

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

Rocky Mountain Power's Proposed Changes to Schedule 73, Subscriber Solar Program Rider Optional	<u>DOCKET NO. 19-035-T08</u> <u>ORDER APPROVING TARIFF CHANGES</u>
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ISSUED: November 18, 2019

On May 9, 2019, Rocky Mountain Power (RMP) filed Advice No. 19-09, proposing revisions to Electric Service Schedule No. 73, Subscriber Solar Program Rider Optional ("Schedule 73"), Sheet Nos. 73.1, 73.2, 73.3, and 73.4. RMP's proposed modifications to Schedule 73 include adding an option for customers to subscribe 100 percent of their usage ("Full Coverage Option") and removing certain tariff rate schedules from eligibility to participate due to lack of customer interest. RMP proposed an effective date of June 30, 2019 for these changes.

The Office of Consumer Services (OCS) filed comments on May 21, 2019, and the Division of Public Utilities (DPU) filed comments on May 23, 2019. Both recommended the Public Service Commission (PSC) decline to approve RMP's proposed changes to Schedule 73. On May 30, 2019, RMP filed reply comments supporting a suspension order in order to address parties' concerns. On May 31, 2019, the PSC issued an order suspending the proposed tariff changes. On June 5, 2019, the Utah Association of Energy Users (UAE) filed comments requesting the PSC decline to adopt certain of RMP's proposed modifications to Schedule 73, suspend the tariff changes to Schedule 73, and issue a notice of scheduling conference to allow additional time for parties to provide comment.

On September 18, 2019, RMP filed a Supplemental Filing that withdrew its initial proposal to eliminate certain schedules from eligibility for Schedule 73. The Supplemental Filing

included revised Sheet Nos. 73.1, 73.2, 73.3, and 73.4, with a proposed effective date of January 1, 2020. On October 3, 2019, the PSC issued a Scheduling Order pertaining to RMP's Supplemental Filing.

On October 16, 2019, the DPU, the OCS, and Utah Clean Energy (UCE) filed comments. On October 25, 2019, RMP and UCE filed reply comments. RMP's reply comments included updated tariff sheets 73.1, 73.2, and 73.3 with an effective date of January 1, 2020.

PARTIES' COMMENTS ON RMP'S SUPPLEMENTAL FILING

The DPU recommends approval of RMP's proposed changes, concluding they are reasonable and in the public interest. The DPU also asserts the reduction in Energy Balancing Account (EBA) expense resulting from variable blocks, as RMP explained, is beneficial to other ratepayers and is in the public interest.

The OCS believes RMP's proposal has merit and recommends approval with specific recommendations addressing the cancellation fee, customer changes, and over-subscription.

- 1) The cancellation fee for the Full Coverage Option should be based on a calculation of the equivalent number of blocks, or another method more equitable than RMP's proposal of up to \$100 per customer;
- 2) customers requesting to move from the Block Option to the Full Coverage Option should be placed at the bottom of the wait list for any additional kWh requirements and participation in the Block Option would continue until the customer reaches the top of the wait list at which time the customer could be moved to the Full Coverage Option;
- 3) if RMP becomes aware of issues regarding over-subscription, it should promptly notify the PSC and propose modifications to alleviate the problem; and
- 4) the correction of certain proposed Schedule 73 language.

The OCS also requests RMP conduct a quarterly meeting with the OCS and the DPU to provide specific updates.

UCE supports RMP's proposed tariff changes and suggests additional reporting by RMP. UCE also supports the OCS's recommendations. UCE also makes recommendations related to cancelation fees and customer changes.

In its reply comments, RMP agreed to the parties' recommendations presented in their October 16, 2019 comments and filed modified Sheet Nos. 73.1, 73.2, and 73.3¹ consistent with the recommendations. RMP also committed to provide stakeholders a periodic report once the Full Coverage Option has been implemented addressing how the Full Coverage Option is affecting the Subscriber Solar Program. RMP clarifies that while it requests approval for the proposed changes to be effective January 1, 2020, the Full Coverage Option requires a billing system update and therefore will not be made available to customers until after the update has occurred "sometime during 2020 after approval has been granted."² RMP commits to keep stakeholders informed as to the progress of the billing system update.

FINDINGS AND CONCLUSIONS

Based on the comments filed in this docket, including the revisions made by RMP to address stakeholder concerns, we find and conclude RMP's updated tariff sheets and commitments proffered in its reply comments are just and reasonable, and are in the public interest because they better align the Solar Subscriber Program with the ways RMP's customers have chosen to participate in the program. We also find that a reduction to the EBA expense resulting from RMP's proposed changes to Schedule 73 is beneficial to customers. We recognize

¹ RMP's September 18, 2019 filing included revisions to Sheet Nos. 73.1 through 73.4. RMP's October 25, 2019 reply comments included revisions only to Sheet Nos. 73.1 through 73.3.

² RMP's October 25, 2019 Reply Comments at 2.

RMP's assertion that a billing system update will impact the proposed January 1, 2020 effective date.

ORDER

1. We approve RMP's proposed changes to Schedule 73 filed on October 25, 2019.
2. RMP shall file updated Schedule 73 tariff sheets with an effective date consistent with the completion of the billing system upgrade.

DATED at Salt Lake City, Utah, November 18, 2019.

/s/ Michael J. Hammer
Presiding Officer

Approved and Confirmed November 18, 2019, as the Order of the Public Service Commission of Utah.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Jordan A. White, Commissioner

Attest:

/s/ Gary L. Widerburg
PSC Secretary
DW#311147

Notice of Opportunity for Agency Review or Rehearing

Pursuant to §§ 63G-4-301 and 54-7-15 of the Utah Code, an aggrieved party may request agency review or rehearing of this Order by filing a written request with the PSC within 30 days after the issuance of this Order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the PSC does not grant a request for review or rehearing within 20 days after the filing of the request, it is deemed denied. Judicial review of the PSC's final agency action may be obtained by filing a petition for review with the Utah Supreme Court within 30 days after final agency action. Any petition for review must comply with the requirements of §§ 63G-4-401 and 63G-4-403 of the Utah Code and Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on November 18, 2019, a true and correct copy of the foregoing was delivered upon the following as indicated below:

By Email:

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