

-BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH-

)	
)	
IN THE MATTER OF THE APPLICATION OF)	DOCKET No. 20-035-04
ROCKY MOUNTAIN POWER FOR AUTHORITY TO)	Exhibit No. DPU 4.0 SR
INCREASE ITS RETAIL ELECTRIC UTILITY)	
SERVICE RATES IN UTAH AND FOR APPROVAL)	
OF ITS PROPOSED ELECTRIC SERVICE)	
SCHEDULES AND ELECTRIC SERVICE)	
REGULATIONS.)	
)	
)	

FOR THE DIVISION OF PUBLIC UTILITIES
DEPARTMENT OF COMMERCE
STATE OF UTAH

Surrebuttal Testimony of

ROBERT A. DAVIS

October 29, 2020

TABLE OF CONTENTS

I. INTRODUCTION	1
II. PURPOSE OF TESTIMONY	1
III. ANALYSIS AND RECOMMENDATION	1
IV. SUMMARY AND CONCLUSIONS	3

1 **I. INTRODUCTION**

2 **Q: Please state your name and occupation.**

3 A: My name is Robert A. Davis. I am employed as a Utility Technical Consultant at the
4 Utah Department of Commerce-Division of Public Utilities (“Division”).

5 **Q: Are you the same Robert A. Davis who filed direct and rebuttal testimony in this**
6 **matter.**

7 A: Yes.

8 **II. PURPOSE OF SURREBUTAL TESTIMONY**

9 **Q: What is the purpose of your surrebuttal testimony in the Phase I Revenue**
10 **Requirement portion of this proceeding?**

11 A: My surrebuttal testimony offers the Division’s final conclusions and recommendations to
12 the Public Service Commission of Utah (“Commission”) concerning Rocky Mountain
13 Power’s (“RMP”) proposal to expand the Solar Subscriber Program in Utah (“Program”).

14 **III. ANALYSIS AND RECOMMENDATION**

15 **Q: What has the Division reviewed and analyzed to reach its conclusions?**

16 A: The Division has reviewed the direct testimony of the Office of Consumer Services
17 (“OCS”) witness Alyson Anderson, the direct testimony of Utah Clean Energy’s (“UCE”)
18 witness Sarah Wright, and the direct and rebuttal testimony put forth by RMP’s witnesses
19 Joelle Steward, William Comeau, David Webb, and Kyle Moore. The request for
20 approval in this general rate case is not necessary and should be addressed in an

21 appropriate proceeding.

22 **Q: Did anything the Division reviewed in preparing this surrebuttal testimony change**
23 **its prior conclusions and recommendations?**

24 A: Yes. Ms. Steward claims in her rebuttal testimony that RMP believes that consideration
25 of the revised program structure now in the general rate case would facilitate a more
26 timely process after the rate case to obtain approval of the specific program rates once a
27 new resource has been acquired.¹ Ms. Steward goes on to claim that RMP is seeking
28 approval for the new program structure and the opportunity to expand it with new
29 resources. RMP is not seeking pre-approval of a resource in this proceeding and the tariff
30 changes in this proceeding do not include rates for the expanded program.²

31 The Division does not support RMP's request during this proceeding because evaluation
32 of the resource cost, accounting, billing, and tariff design will need to be evaluated in
33 depth after the resource has been chosen so that the costs and the cost structure of the
34 resource are known. There may be more to the resource acquisition than simply issuing
35 an RFP and acquiring a new resource to plug in to an existing tariff structure. For this
36 reason, the Division supports doing a comprehensive evaluation of the expansion and the
37 tariff in a separate docket.

38 **Q: Please offer the Division's recommendations concerning RMP's proposed**

¹ See RMP witness Joelle Steward, Rebuttal Testimony, 20-035-04, 10-5-20, lines 410-413.

² Id., lines 417-420.

39 **Subscriber Solar program.**

40 A: The Division finds RMP’s solar subscriber proposal reasonable in structure and generally
41 supports its proposal overall. However, there simply is not enough evidence to support
42 approval in this proceeding without knowing more about the resource specific attributes
43 and costs. The Division is also concerned how the current subscriber solar program and
44 the proposed new program will interact to mitigate ratepayer impacts and prevent
45 potential cost shifting. The Division, therefore, recommends that the Commission not
46 approve RMP’s Subscriber Solar proposal, but rather open a stand-alone docket when the
47 resource costs and accounting for the program become available.

48 **IV. SUMMARY AND CONCLUSIONS**

49 **Q: Will you summarize your analysis and findings for RMP’s proposed subscriber**
50 **solar program and offer your recommendations?**

51 A: Yes. RMP’s proposed Subscriber Solar Program mirrors the current subscriber solar
52 program with the exception of customer billing, including large customers over 100
53 MWh, and treatment of net power costs in the EBA. The Division’s identified concerns
54 regarding how RMP intends to keep the two programs separate or blend the programs,
55 mitigate customer migration from the original program to the new program, EBA
56 impacts, and subscription ramp rate remain after RMP’s response to data requests and
57 filed testimony.

58 The Division generally supports RMP's proposed Subscriber Solar Program based upon
59 the limited information it has received to this point. The uncertain scope of the proposal,
60 lack of evidence of program resource costs, accounting, billing, and actual tariff structure
61 determinants do not support approval in this docket. The Commission should direct RMP
62 to open a stand-alone docket when the information becomes available so that
63 stakeholders have a chance to weigh in based on the program's actual merits.

64 The Division concludes that RMP's proposed Subscriber Solar Program expansion, as
65 filed, is not in the public interest at this time and recommends the Commission not
66 approve the proposal.

67 **Q: Does this conclude your surrebuttal testimony?**

68 **A:** Yes, it does.