

May 11, 2020

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

Re: **Reply Comments**
In the Matter of Rocky Mountain Power's 2019 Annual Report of the Subscriber
Solar Program – Docket No. 20-035-14

On March 27, 2020, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment Period in the above referenced matter, with comments and reply comments to be submitted by April 24, 2020, and May 11, 2020, respectively. The Office of Consumer Services (“OCS”) and Division of Public Utilities (“DPU”) filed comments April 24, 2020. Rocky Mountain Power (“Company”) provides these reply comments in response to comments filed by the OCS and DPU.

The DPU and OCS both recommend the Commission acknowledge the Company's 2019 Subscriber Solar Report (“2019 Report”), with the additional following recommendations:

DPU Recommendations:

1. Update the “Utah Liability Account Balance Reconciliation” section on the Summary tab of Exhibit A to include the beginning balance, annual additions, annual interest, amortization, and ending balance;
2. Include the liability account analysis provided to the DPU in response to Data Request 1.1; and
3. Update the cost model to reflect current tax laws as a result of the latest federal tax reform.

OCS Recommendations:

4. The kWh and corresponding dollar amount charged to the EBA for that year be specifically called out; and
5. Include supporting details regarding the liability account balance.

The Company is agreeable to the above recommendations. Attached hereto as Exhibit A is an updated 2019 Report that addresses items 1 and 4 above. Attached hereto as Confidential Exhibit B is an updated cost model that addresses item 3 above, and lastly, attached hereto as

Public Service Commission of Utah

May 11, 2020

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Exhibit C is a liability account analysis that addresses items 2 and 5 above. The Company will continue to work with stakeholders to ensure future reports include the desired format and support details.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is written in a cursive style with a long, sweeping underline.

Michael S. Snow
Manager, Regulatory Affairs

Enclosures

Exhibit A

2019 Subscriber Solar Summary Report

2019 Program Marketing and Communications Highlights

Program Management Commentary

The company continues to develop plans for a second solar plant to expand the program. Pricing and rates are planning to be reviewed during the 2020 rate case proceedings.

Program Sales Summary

	2017	2018	2019	2019 KWH	2019 % Sold
Total Residential Block Revenues	\$978,013.85	\$1,079,465.85	\$1,069,937.20	16,397,505	34.1%
Total Non-Residential Block Revenues	\$1,769,700.15	\$1,939,784.20	\$1,951,658.08	31,351,937	65.1%
Total Program Revenues	\$2,747,714	\$3,019,250	\$3,021,595	47,749,442	99.2%

Program Expenses Summary

	2015	2016	2017	2018	2019	Total Expenses
Total Program Management/Admin Expenses	\$14,403.35	\$1,015,874.86	\$88,844.28	\$63,660.65	\$65,656.25	\$1,248,439.39
Total Marketing Expenses	\$7,279.47	\$241,552.42	\$201,979.64	\$107,325.83	\$60,979.72	\$619,117.08
Total Interest Expense	\$40.20	\$32,832.73	\$58,533.86	\$66,021.39	\$72,631.26	\$230,059.44
Total Expenses	\$21,723.02	\$1,290,260.01	\$349,357.78	\$237,007.87	\$199,267.23	\$2,097,615.91
Original Budget	\$48,000.00	\$1,531,000.00	\$601,000.00	\$612,000.00	\$198,960.00	\$2,990,960.00
Variance to Budget	-54.74%	-15.72%	-41.87%	-61.27%	0.15%	-29.87%

Generation Status

	Jan 2017-Dec 2019 kWh	Cost
Generation Purchased	146,792,158	\$7,747,285.95
Generation Sold	138,871,808	\$7,329,271.67
Unsold Generation	7,920,350	\$418,014.28

Solar Credits Donated to Low Income Assistance Fund

[Click to see Solar Credits Donated Worksheet](#)

	Jan-Dec 2019 kWh	Donated
Generation Purchased/Unused Credits	1,847,597	\$44,319.96

Utah Liability Account Balance Reconciliation

Jan 2019 Liability Account Balance =	\$1,663,323.29
Annual Additions =	\$126,635.97
Annual Interest =	\$72,631.27
Amortization =	-\$137,690.73
Dec 2019 Liability Account Balance =	\$1,724,899.80

2019 NEWSLETTER - PROGRAM IN REVIEW

2019 Subscriber Solar Newsletter is in development and will be sent during April 2020. A new logo was developed during 2019 and updated collateral will be produced and sent to participants during 2020.

TARIFF UPDATE - FULL COVERAGE OPTION

With the assistance of several stakeholders, a second 'full-coverage' option was approved to enable small commercial (Schedule 23) and residential (Schedule 1 and 3) customers to purchase 100% solar to offset their monthly usage. The option will be offered beginning in June 2020 once the billing system updates are completed.

2019 SUBSCRIPTIONS AND MARKETING

The program sold 99.2% of production during CY2019 with only 159 of 240,000 unbilled blocks for the year, primarily due to cancellations and gaps between billing cycles of new customer subscriptions. Marketing costs were low and mainly focused on expanding awareness through co-marketing partnership opportunities with other programs.

2017 Subscriber Solar Dashboard

BLOCKS INVOICED						REVENUES			ENERGY GENERATED						
	RESIDENTIAL		COMMERCIAL			TOTAL BLOCKS		TOTAL \$	RESIDENTIAL	COMMERCIAL	TOTAL \$	ON PEAK	OFF PEAK	TOTAL KWH	
	1	3	23	6	6A	RESIDENTIAL	COMMERCIAL								
Jan-17	0	0	0	0	6	0	6	Jan-17		\$74.70	\$74.70	Jan-17	1,111,337	249,210	1,360,547
Feb-17	6,368	70	647	661	9,354	6,438	10,662	Feb-17	\$84,015.90	\$132,741.90	\$216,757.80	Feb-17	1,594,272	364,293	1,958,565
Mar-17	6,663	82	829	987	10,889	6,745	12,705	Mar-17	\$88,022.25	\$158,177.25	\$246,199.50	Mar-17	3,033,670	462,882	3,496,552
Apr-17	6,739	77	857	987	11,424	6,816	13,268	Apr-17	\$88,948.80	\$165,186.60	\$254,135.40	Apr-17	3,749,570	801,746	4,551,316
May-17	6,756	84	948	989	9,870	6,840	11,807	May-17	\$89,260.70	\$146,995.91	\$236,256.60	May-17	4,796,903	1,032,450	5,829,353
Jun-17	6,779	77	1,001	989	11,734	6,855	13,724	Jun-17	\$89,463.75	\$170,862.93	\$260,326.68	Jun-17	5,595,631	911,279	6,506,910
Jul-17	6,787	77	793	989	12,073	6,864	13,855	Jul-17	\$89,575.40	\$172,495.56	\$262,070.96	Jul-17	4,405,509	1,181,571	5,587,080
Aug-17	6,795	71	977	989	11,134	6,866	13,100	Aug-17	\$89,606.06	\$163,095.00	\$252,701.06	Aug-17	4,586,316	656,321	5,242,637
Sep-17	6,849	68	771	989	10,638	6,917	12,398	Sep-17	\$90,267.18	\$154,350.49	\$244,617.67	Sep-17	3,495,525	768,801	4,264,326
Oct-17	6,822	61	966	989	11,797	6,883	13,752	Oct-17	\$89,821.98	\$171,213.21	\$261,035.18	Oct-17	3,671,224	647,574	4,318,798
Nov-17	6,827	61	742	995	11,372	6,888	13,109	Nov-17	\$89,891.01	\$163,207.05	\$253,098.06	Nov-17	2,161,378	420,725	2,582,103
Dec-17	6,769	62	878	989	11,892	6,831	13,759	Dec-17	\$89,140.83	\$171,299.55	\$260,440.38	Dec-17	2,091,143	357,667	2,448,810
TOTAL Blocks	74,154	790	9,409	10,553	122,183	74,944	142,145	TOTAL \$	\$978,013.85	\$1,769,700.15	\$2,747,714.00	TOTAL KWH	40,292,478	7,854,519	48,146,997
TOTAL KWH	14,830,786	157,932	1,881,718	2,110,600	24,436,600	14,988,718	28,428,918								
						Res and Comm KWH	43,417,636								

2015-2017 EXPENSE DETAIL

	PROGRAM ADMIN & BILLING SETUP			TOTAL ADMIN	MARKETING			TOTAL EXP	Original Budget	Variance	
	Program Mgmt	Call Center	I/T Billing		Cust Outreach	Prod/Collateral	Website				TOTAL MKTG
2015	\$14,403.35			\$14,403.35		\$7,279.47	\$7,279.47	\$21,682.82	\$48,000.00	\$26,317.18	
2016	\$140,859.08	\$26,043.62	\$848,972.16	\$1,015,874.86	\$103,152.92	\$0.00	\$138,399.50	\$241,552.42	\$1,257,427.28	\$1,531,000.00	\$273,572.72
Jan-17	\$4,784.00	\$5,809.16	\$1,998.01	\$12,591.17	\$2,186.53			\$2,186.53	\$14,777.70	\$50,000.00	\$35,222.30
Feb-17	\$5,200.00	\$1,511.10	\$521.39	\$7,232.49	\$1,451.00			\$1,451.00	\$8,683.49	\$50,000.00	\$41,316.51
Mar-17	\$6,757.01	\$481.32	\$1,519.05	\$8,757.38	\$8,024.69			\$8,024.69	\$16,782.07	\$50,000.00	\$33,217.93
Apr-17	\$3,386.00		\$444.60	\$3,830.60	\$1,888.93			\$1,888.93	\$5,719.53	\$50,000.00	\$44,280.47
May-17	\$3,731.00		\$37.05	\$3,768.05	\$833.33	\$16.51	\$20,200.00	\$21,049.84	\$24,817.89	\$50,000.00	\$25,182.11
Jun-17	\$6,216.56	\$6,777.99		\$12,994.55				\$0.00	\$12,994.55	\$50,000.00	\$37,005.45
Jul-17	\$6,788.00	-\$1,072.10		\$5,715.90			\$50,383.00	\$50,383.00	\$56,098.90	\$50,000.00	-\$6,098.90
Aug-17	\$5,819.50			\$5,819.50	\$1,051.73		\$12,952.00	\$14,003.73	\$19,823.23	\$50,000.00	\$30,176.77
Sep-17	\$5,946.56			\$5,946.56	\$5,862.80	\$1,115.23	\$12,989.00	\$19,967.03	\$25,913.59	\$50,000.00	\$24,086.41
Oct-17	\$9,051.77			\$9,051.77			\$10,040.00	\$10,040.00	\$19,091.77	\$50,000.00	\$30,908.23
Nov-17	\$8,882.70			\$8,882.70	\$464.19		\$12,140.25	\$12,604.44	\$21,487.14	\$50,000.00	\$29,512.86
Dec-17	\$4,180.00	\$73.61		\$4,253.61	\$26,060.06	\$26,520.39	\$7,800.00	\$60,380.45	\$64,634.06	\$51,000.00	\$536,365.94
2017	\$70,743.10	\$13,581.08	\$4,520.10	\$88,844.28	\$47,823.26	\$27,652.13	\$126,504.25	\$201,979.64	\$290,823.92	\$601,000.00	\$310,176.08
TOTAL EXPENSE	\$226,005.53	\$39,624.70	\$853,492.26	\$1,119,122.49	\$150,976.18	\$34,931.60	\$264,903.75	\$450,811.53	\$1,569,934.02	\$2,180,000.00	\$610,065.98

INTEREST EXPENSE	
2015	\$40.20
2016	\$32,832.73
2017	\$58,533.86
Cancellation Fees	
2017	\$16,050.00

COST OF GENERATION	
	2017
Jan-17	\$71,641.88
Feb-17	\$103,217.23
Mar-17	\$184,422.95
Apr-17	\$240,114.48
May-17	\$307,594.84
Jun-17	\$343,369.85
Jul-17	\$294,802.82
Aug-17	\$276,616.23
Sep-17	\$224,961.41
Oct-17	\$227,837.53
Nov-17	\$136,140.04
Dec-17	\$129,102.17
TOTAL	\$2,539,821.44

2018 Subscriber Solar Dashboard

BLOCKS INVOICED						REVENUES			ENERGY GENERATED						
	RESIDENTIAL		COMMERCIAL			TOTAL BLOCKS			RESIDENTIAL	COMMERCIAL	TOTAL \$		ON PEAK	OFF PEAK	TOTAL KWH
	1	3	23	6	6A	RESIDENTIAL	COMMERCIAL								
Jan-18	6,771	69	852	982	10,009	6,840	11,843	Jan-18	\$89,263.63	\$147,445.35	\$236,708.98	Jan-18	2,099,062	435,843	2,534,905
Feb-18	6,761	70	722	968	11,181	6,831	12,871	Feb-18	\$89,146.05	\$160,243.08	\$249,389.13	Feb-18	2,583,035	457,613	3,040,648
Mar-18	7,005	70	708	249	10,853	7,075	11,810	Mar-18	\$92,334.95	\$147,034.50	\$239,369.45	Mar-18	3,751,634	394,482	4,146,116
Apr-18	6,810	70	1,099	1,806	12,043	6,880	14,948	Apr-18	\$89,785.24	\$186,107.58	\$275,892.82	Apr-18	3,790,460	854,798	4,645,258
May-18	6,617	70	676	981	10,619	6,687	12,276	May-18	\$87,260.52	\$152,841.99	\$240,102.51	May-18	4,664,218	815,070	5,479,288
Jun-18	6,851	66	932	1,151	10,999	6,918	13,082	Jun-18	\$90,274.48	\$162,872.89	\$253,147.38	Jun-18	5,853,106	926,663	6,779,769
Jul-18	6,835	64	839	1,151	12,245	6,899	14,235	Jul-18	\$90,034.49	\$177,223.94	\$267,258.44	Jul-18	4,379,884	1,235,167	5,615,051
Aug-18	6,800	63	898	1,151	10,100	6,863	12,149	Aug-18	\$89,567.50	\$151,255.05	\$240,822.55	Aug-18	4,470,187	735,177	5,205,364
Sep-18	6,997	66	916	1,233	10,496	7,063	12,646	Sep-18	\$92,171.30	\$157,436.85	\$249,608.15	Sep-18	4,243,722	1,026,513	5,270,235
Oct-18	6,821	68	893	981	11,591	6,889	13,465	Oct-18	\$89,896.95	\$167,639.25	\$257,536.20	Oct-18	3,035,636	369,026	3,404,662
Nov-18	6,856	56	829	981	11,412	6,912	13,222	Nov-18	\$90,198.27	\$164,620.00	\$254,818.27	Nov-18	2,405,862	365,483	2,771,345
Dec-18	6,812	49	841	1,097	11,320	6,861	13,258	Dec-18	\$89,532.46	\$165,063.72	\$254,596.18	Dec-18	1,347,405	271,813	1,619,218
TOTAL Blocks	81,937	781	10,207	12,731	132,868	82,718	155,806	TOTAL \$	\$1,079,465.85	\$1,939,784.20	\$3,019,250.06	TOTAL KWH	42,624,211	7,887,648	50,511,859
TOTAL KWH	16,387,379	156,159	2,041,313	2,546,240	26,573,639	16,543,538	31,161,192								
						Res and Comm KWH	47,704,730								

2015-2018 EXPENSE DETAIL											
	PROGRAM ADMIN & BILLING SETUP				MARKETING				TOTAL EXP	Original Budget	Variance
	Program Mgmt	Call Center	I/T Billing	TOTAL ADMIN	Cust Outreach	Prod/Collateral	Website	TOTAL MKTG			
2015	\$14,403.35			\$14,403.35				\$7,279.47	\$21,682.82	\$48,000.00	\$26,317.18
2016	\$140,859.08	\$26,043.62	\$848,972.16	\$1,015,874.86	\$103,152.92	\$0.00	\$138,399.50	\$241,552.42	\$1,257,427.28	\$1,531,000.00	\$273,572.72
2017	\$70,743.10	\$13,581.08	\$4,520.10	\$88,844.28	\$47,823.26	\$27,652.13	\$126,504.25	\$201,979.64	\$290,823.92	\$601,000.00	\$310,176.08
Jan-18	\$5,606.50			\$5,606.50			\$10,276.75	\$10,276.75	\$15,883.25	\$51,000.00	\$35,116.75
Feb-18	\$5,211.00			\$5,211.00	\$75.00			\$75.00	\$5,286.00	\$51,000.00	\$45,714.00
Mar-18	\$4,399.50			\$4,399.50		\$63.30	\$12,492.25	\$12,555.55	\$16,955.05	\$51,000.00	\$34,044.95
Apr-18	\$5,935.00	\$0.00		\$5,935.00	\$1,195.62	\$9,204.25	\$5,114.00	\$15,513.87	\$21,448.87	\$51,000.00	\$29,551.13
May-18	\$2,860.00			\$2,860.00	\$1,325.09	\$15.83	\$7,092.25	\$8,433.17	\$11,293.17	\$51,000.00	\$39,706.83
Jun-18	\$6,240.74	\$0.00		\$6,240.74	\$200.00	\$1,190.45	\$2,928.00	\$4,318.45	\$10,559.19	\$51,000.00	\$40,440.81
Jul-18	\$5,600.00	\$0.00		\$5,600.00	\$1,701.65	\$170.00	\$10,164.25	\$12,035.90	\$17,635.90	\$51,000.00	\$33,364.10
Aug-18	\$7,889.13	\$8,604.20		\$16,493.33	\$272.80	\$0.00	\$1,040.00	\$1,312.80	\$17,806.13	\$51,000.00	\$33,193.87
Sep-18	\$2,418.00	\$204.06		\$2,622.06	\$0.00	\$0.00	\$8,649.75	\$8,649.75	\$11,271.81	\$51,000.00	\$39,728.19
Oct-18	\$2,687.74	\$0.00		\$2,687.74	\$799.70	\$0.00	\$17,086.50	\$17,886.20	\$20,573.94	\$51,000.00	\$30,426.06
Nov-18	\$5,867.28	\$0.00		\$5,867.28	\$0.00	\$0.00	\$0.00	\$0.00	\$5,867.28	\$51,000.00	\$45,132.72
Dec-18	\$137.50	\$0.00		\$137.50	\$7,708.57	\$0.00	\$8,559.82	\$16,268.39	\$16,405.89	\$51,000.00	\$34,594.11
2018	\$54,852.39	\$8,808.26	\$0.00	\$63,660.65	\$13,278.43	\$10,643.83	\$83,403.57	\$107,325.83	\$170,986.48	\$612,000.00	\$441,013.52
TOTAL EXPENSE	\$280,857.92	\$48,432.96	\$853,492.26	\$1,182,783.14	\$164,254.61	\$45,575.43	\$348,307.32	\$558,137.36	\$1,740,920.50	\$2,792,000.00	\$1,051,079.50
									Less Interest, plus cancellation fees		\$927,251.32

INTEREST EXPENSE	
2015	\$40.20
2016	\$32,832.73
2017	\$58,533.86
2018	\$66,021.39
Cancellation Fees	
2017	\$16,050.00
2018	\$17,550.00

COST OF GENERATION			
	2017	2018	TOTAL
Jan	\$71,641.88	\$133,647.98	\$205,289.87
Feb	\$103,217.23	\$160,511.21	\$263,728.44
Mar	\$184,422.95	\$218,879.92	\$403,302.87
Apr	\$240,114.48	\$245,234.62	\$485,349.11
May	\$307,594.84	\$289,271.41	\$596,866.24
Jun	\$343,369.85	\$357,936.80	\$701,306.65
Jul	\$294,802.82	\$296,439.69	\$591,242.52
Aug	\$276,616.23	\$274,808.22	\$551,424.45
Sep	\$224,961.41	\$278,233.41	\$503,194.82
Oct	\$227,837.53	\$179,731.15	\$407,568.69
Nov	\$136,140.04	\$146,292.02	\$282,432.05
Dec	\$129,102.17	\$85,459.71	\$214,561.88
TOTAL	\$2,539,821.44	\$2,666,446.15	\$5,206,267.59

2019 Subscriber Solar Dashboard

BLOCKS INVOICED						REVENUES			ENERGY GENERATED						
	RESIDENTIAL		COMMERCIAL			TOTAL BLOCKS			RESIDENTIAL	COMMERCIAL	TOTAL \$		ON PEAK	OFF PEAK	TOTAL KWH
	1	3	23	6	6A	RESIDENTIAL	COMMERCIAL								
Jan-19	6,829	51	831	1,070	11,386	6,880	13,287	Jan-19	\$89,785.96	\$165,423.15	\$255,209.11	Jan-19	1,922,541	298,342	2,220,883
Feb-19	6,849	54	975	904	11,075	6,903	12,954	Feb-19	\$90,080.10	\$161,279.35	\$251,359.46	Feb-19	2,215,260	482,449	2,697,709
Mar-19	6,853	54	744	898	11,229	6,907	12,871	Mar-19	\$90,131.06	\$160,246.38	\$250,377.44	Mar-19	2,900,294	638,481	3,538,775
Apr-19	6,846	54	1,002	900	12,621	6,900	14,523	Apr-19	\$90,051.13	\$180,817.14	\$270,868.27	Apr-19	3,559,883	637,724	4,197,607
May-19	6,826	54	769	898	11,237	6,880	12,904	May-19	\$89,789.81	\$160,654.80	\$250,444.61	May-19	4,175,765	710,524	4,886,289
Jun-19	6,810	50	872	898	11,489	6,878	13,241	Jun-19	\$89,757.90	\$164,850.45	\$254,608.35	Jun-19	4,864,161	806,043	5,670,204
Jul-19	6,808	53	841	899	9,880	6,861	11,620	Jul-19	\$89,541.01	\$144,666.51	\$234,207.52	Jul-19	4,602,261	1,024,753	5,627,014
Aug-19	6,807	50	830	779	11,659	6,857	13,268	Aug-19	\$89,484.18	\$165,184.92	\$254,669.10	Aug-19	5,123,317	792,074	5,915,391
Sep-19	6,784	49	834	779	10,672	6,833	12,285	Sep-19	\$89,166.67	\$152,944.08	\$242,110.75	Sep-19	3,904,735	991,117	4,895,852
Oct-19	6,744	49	989	779	11,893	6,793	13,661	Oct-19	\$88,654.59	\$170,081.94	\$258,736.53	Oct-19	3,809,982	531,872	4,341,854
Nov-19	6,739	49	766	105	11,891	6,788	12,762	Nov-19	\$88,584.18	\$158,886.90	\$247,471.08	Nov-19	2,171,476	384,841	2,556,317
Dec-19	6,459	48	982	1,453	10,948	6,507	13,383	Dec-19	\$84,910.61	\$166,622.46	\$251,533.07	Dec-19	1,360,637	224,770	1,585,407
TOTAL Blocks	81,354	615	10,436	10,362	135,979	81,988	156,760	TOTAL \$	\$1,069,937.20	\$1,951,658.08	\$3,021,595.28	TOTAL KWH	40,610,312	7,522,990	48,133,302
TOTAL KWH	16,270,824	123,079	2,087,218	2,072,493	27,195,826	16,397,505	31,351,937								
						Res and Comm KWH	47,749,442								

2015-2018 EXPENSE DETAIL

	PROGRAM ADMIN & BILLING SETUP				MARKETING				TOTAL EXP	Original Budget	Variance
	Program Mgmt	Call Center	I/T Billing	TOTAL ADMIN	Cust Outreach	Prod/Collateral	Website	TOTAL MKTG			
2015	\$14,403.35			\$14,403.35		\$7,279.47		\$7,279.47	\$21,682.82	\$48,000.00	\$26,317.18
2016	\$140,859.08	\$26,043.62	\$848,972.16	\$1,015,874.86	\$103,152.92	\$0.00	\$138,399.50	\$241,552.42	\$1,257,427.28	\$1,531,000.00	\$273,572.72
2017	\$70,743.10	\$13,581.08	\$4,520.10	\$88,844.28	\$47,823.26	\$27,652.13	\$126,504.25	\$201,979.64	\$290,823.92	\$601,000.00	\$310,176.08
2018	\$54,852.39	\$8,808.26	\$0.00	\$63,660.65	\$13,278.43	\$10,643.83	\$83,403.57	\$107,325.83	\$170,986.48	\$612,000.00	\$441,013.52
Jan-19	\$1,930.00	\$0.00	\$0.00	\$1,930.00	\$0.00	\$0.00	\$2,040.00	\$2,040.00	\$3,970.00	\$16,580.00	\$12,610.00
Feb-19	\$3,985.12	\$0.00	\$0.00	\$3,985.12	\$0.00	\$0.00	\$0.00	\$0.00	\$3,985.12	\$16,580.00	\$12,594.88
Mar-19	\$3,799.53	\$0.00	\$0.00	\$3,799.53	\$9,477.06	\$0.00	\$0.00	\$9,477.06	\$13,276.59	\$16,580.00	\$3,303.41
Apr-19	\$2,076.00	\$3,126.63	\$0.00	\$5,202.63	\$523.04	\$0.00	\$0.00	\$523.04	\$5,725.67	\$16,580.00	\$10,854.33
May-19	\$6,061.98	\$867.86	\$0.00	\$6,929.84	\$0.00	\$0.00	\$5,120.00	\$5,120.00	\$12,049.84	\$16,580.00	\$4,530.16
Jun-19	\$3,191.00	\$24.03	\$0.00	\$3,215.03	\$10,056.94	\$0.00	\$27,522.68	\$37,579.62	\$40,794.65	\$16,580.00	-\$24,214.65
Jul-19	\$5,423.72	\$0.00	\$0.00	\$5,423.72	\$0.00	\$0.00	\$1,040.00	\$1,040.00	\$6,463.72	\$16,580.00	\$10,116.28
Aug-19	\$3,498.19	\$0.00	\$0.00	\$3,498.19	\$0.00	\$0.00	\$0.00	\$0.00	\$3,498.19	\$16,580.00	\$13,081.81
Sep-19	\$4,018.21	\$0.00	\$0.00	\$4,018.21	\$0.00	\$0.00	\$2,080.00	\$2,080.00	\$6,098.21	\$16,580.00	\$10,481.79
Oct-19	\$1,464.00	\$0.00	\$0.00	\$1,464.00	\$0.00	\$0.00	\$1,040.00	\$1,040.00	\$2,504.00	\$16,580.00	\$14,076.00
Nov-19	\$10,036.00	\$0.00	\$0.00	\$10,036.00	\$0.00	\$0.00	\$1,040.00	\$1,040.00	\$11,076.00	\$16,580.00	\$5,504.00
Dec-19	\$4,542.46	\$3,731.52	\$7,880.00	\$16,153.98	\$0.00	\$0.00	\$1,040.00	\$1,040.00	\$17,193.98	\$16,580.00	-\$613.98
2019	\$50,026.21	\$7,750.04	\$7,880.00	\$65,656.25	\$20,057.04	\$0.00	\$40,922.68	\$60,979.72	\$126,635.97	\$198,960.00	\$72,324.03
TOTAL EXPENSE	\$330,884.13	\$56,183.00	\$861,372.26	\$1,248,439.39	\$184,311.65	\$45,575.43	\$389,230.00	\$619,117.08	\$1,867,556.47	\$2,990,960.00	\$1,123,403.53
									Less Interest, plus cancellation fees		\$939,244.09

INTEREST EXPENSE	
2015	\$40.20
2016	\$32,832.73
2017	\$58,533.86
2018	\$66,021.39
2019	\$72,631.26
Cancellation Fees	
2017	\$16,050.00
2018	\$17,550.00
2019	\$12,300.00

COST OF GENERATION				
	2017	2018	2019	TOTAL
Jan	\$71,641.88	\$133,647.98	\$117,227.62	\$322,517.49
Feb	\$103,217.23	\$160,511.21	\$142,404.04	\$406,132.48
Mar	\$184,422.95	\$218,879.92	\$186,812.32	\$590,115.19
Apr	\$240,114.48	\$245,234.62	\$221,598.65	\$706,947.76
May	\$307,594.84	\$289,271.41	\$257,961.06	\$854,827.30
Jun	\$343,369.85	\$357,936.80	\$299,351.77	\$1,000,658.42
Jul	\$294,802.82	\$296,439.69	\$297,071.34	\$888,313.86
Aug	\$276,616.23	\$274,808.22	\$312,297.64	\$863,722.10
Sep	\$224,961.41	\$278,233.41	\$258,465.99	\$761,660.81
Oct	\$227,837.53	\$179,731.15	\$229,214.89	\$636,783.58
Nov	\$136,140.04	\$146,292.02	\$134,938.55	\$417,370.60
Dec	\$129,102.17	\$85,459.71	\$83,674.49	\$298,236.37
TOTAL	\$2,539,821.44	\$2,666,446.15	\$2,541,018.35	\$7,747,285.95

ENERGY BALANCING ACCOUNT	
Total kWhs charged to EBA	383,860
Total unsold generation charged to EBA	\$ 20,267.82

Subscriber Solar Credit - Excess Energy Valuation

[Return to Summary](#)

Onpeak	Hrs
Hrs Per Day (6am to 10pm)	16
Days Per Week	6
Total	96
Offpeak (10pm to 6am)	8
Days	6
Total	48
Sunday	24
Total	72
Total Hours	168
Reconcile 7 * 24	168

Uses volumetric winter and summer energy prices for on-peak and off-peak hours for non-levelized tracking solar facilities

2019 Winter (Oct-May) - Prices effective Jan 2020 (time of valuation/single donation)	Percent	Sch. 37	Calc	Allocation (8 mo)	cents per kWh
Onpeak Rate	0.57	2.097	1.20	0.66666667	0.80
Offpeak Rate	0.43	1.876	0.81	0.66666667	0.54

2019 Summer (Jun-Sep) - Prices effective Jan 2020 (time of valuation/single donation)	Percent	Sch. 37	Calc	Allocation (4 mo)	cents per kWh
Onpeak Rate	0.57	4.098	2.34	0.33333333	0.78
Offpeak Rate	0.43	1.985	0.85	0.33333333	0.28

Total Donated kWh value, 2019	1,847,597
Total Avoided Cost (per kWh)	\$0.0240
Annualized Billing Period (12 months)	\$ 44,319.96

Customer Class	Donation
Commercial	948,269
Industrial	605,204
Residential	294,124
Grand Total	1,847,597

Confidential
Exhibit B

**THIS EXHIBIT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER
SEPARATE COVER**

Exhibit C

Subscriber Solar Liability Account
Cumulative Balance

	Beginning Balance	Additions	(Spend)	Amortization	Interest	Ending Balance
Dec-15	-		21,682.82	-	40.20	21,723.02
	FY2015		21,682.82	-	40.20	
Jan-16	21,723.02		21,153.30	-	119.78	42,996.10
Feb-16	42,996.10		166,577.15	-	468.31	210,041.56
Mar-16	210,041.56		142,643.62	-	1,043.39	353,728.57
Apr-16	353,728.57		121,126.83	-	1,536.33	476,391.73
May-16	476,391.73		163,251.74	-	2,069.32	641,712.78
Jun-16	641,712.78		132,269.74	-	2,624.94	776,607.46
Jul-16	776,607.46		124,252.26	-	3,110.30	903,970.02
Aug-16	903,970.02		206,529.25	-	3,735.16	1,114,234.43
Sep-16	1,114,234.43		51,474.59	-	4,227.40	1,169,936.42
Oct-16	1,169,936.42		54,031.44	-	4,438.70	1,228,406.56
Nov-16	1,228,406.56		52,248.05	-	4,652.22	1,285,306.83
Dec-16	1,285,306.83		21,869.31	-	4,806.90	1,311,983.03
	FY2016		1,257,427.28	-	32,832.73	
Jan-17	1,311,983.03		14,777.70	(8,328.00)	4,581.02	1,323,013.75
Feb-17	1,323,013.75		8,683.49	(8,328.00)	4,619.52	1,327,988.76
Mar-17	1,327,988.76		16,782.07	(8,328.00)	4,636.89	1,341,079.72
Apr-17	1,341,079.72		5,719.53	(8,349.36)	4,678.01	1,343,127.90
May-17	1,343,127.90		24,817.89	(8,503.50)	4,718.24	1,364,160.53
Jun-17	1,364,160.53		6,216.56	(8,542.00)	4,759.13	1,366,594.22
Jul-17	1,366,594.22		63,948.99	(8,941.10)	4,867.73	1,426,469.84
Aug-17	1,426,469.84		18,751.13	(9,058.40)	4,997.68	1,441,160.25
Sep-17	1,441,160.25		25,913.59	(9,221.00)	5,061.19	1,462,914.03
Oct-17	1,462,914.03		19,091.77	(9,341.15)	5,125.03	1,477,789.68
Nov-17	1,477,789.68		21,487.14	(9,476.72)	5,180.92	1,494,981.02
Dec-17	1,494,981.02		64,634.06	(13,924.81)	5,308.51	1,550,998.78
	FY2017		290,823.92	(110,342.04)	58,533.87	
Jan-18	1,550,998.78		15,883.25	(9,975.10)	5,425.89	1,562,332.81
Feb-18	1,562,332.81		5,286.00	(9,994.35)	5,446.93	1,563,071.39
Mar-18	1,563,071.39		16,955.05	(10,102.57)	5,469.69	1,575,393.56
Apr-18	1,575,393.56		21,448.87	(10,156.79)	5,388.71	1,592,074.35
May-18	1,592,074.35		11,293.17	(10,228.71)	5,428.13	1,598,566.94
Jun-18	1,598,566.94		10,559.19	(10,311.61)	5,448.87	1,604,263.39
Jul-18	1,604,263.39		17,635.90	(10,424.77)	5,480.15	1,616,954.68
Aug-18	1,616,954.68		17,806.13	(10,523.38)	5,523.53	1,629,760.96
Sep-18	1,629,760.96		11,271.81	(10,596.04)	5,555.92	1,635,992.64
Oct-18	1,635,992.64		20,573.94	(10,729.07)	5,592.79	1,651,430.30
Nov-18	1,651,430.30		5,867.28	(10,767.12)	5,620.27	1,652,150.73
Dec-18	1,652,150.73		16,405.89	(10,873.86)	5,640.51	1,663,323.26
	FY2018		170,986.48	(124,683.38)	66,021.39	
Jan-19	1,663,323.26		3,970.00	(10,899.77)	5,657.35	1,662,050.84
Feb-19	1,662,050.84		4,835.12	(10,931.43)	5,654.43	1,661,608.97
Mar-19	1,661,608.97		13,576.59	(11,020.59)	5,667.67	1,669,832.64
Apr-19	1,669,832.64		4,575.67	(11,050.74)	6,069.18	1,669,426.76
May-19	1,669,426.76		12,049.84	(11,376.15)	6,080.72	1,676,181.17
Jun-19	1,676,181.17		40,794.65	(11,652.52)	6,157.16	1,711,480.45
Jul-19	1,711,480.45		6,463.72	(11,696.45)	6,223.11	1,712,470.83
Aug-19	1,712,470.83		3,498.19	(11,720.30)	6,221.28	1,710,470.00
Sep-19	1,710,470.00		6,098.21	(11,762.01)	6,218.65	1,711,024.85
Oct-19	1,711,024.85		2,504.00	(11,779.19)	6,214.09	1,707,963.75
Nov-19	1,707,963.75		11,076.00	(11,855.44)	6,218.42	1,713,402.73
Dec-19	1,713,402.73		17,193.98	(11,946.14)	6,249.20	1,724,899.77
	FY2019		126,635.97	(137,690.73)	72,631.27	

**UT - Subscriber Solar Program
Amortization Calculation**

			<u>Periods</u>			<u>Current Interest</u>	<u>Principal</u>		
			240			4.37%	1,311,983.05		
<u>Year</u>	<u>Month</u>	<u>Pd</u>	<u>Amortization</u>	<u>Additions</u>	<u>Interest</u>	<u>Principal Balance</u>	<u>Months Remaining</u>		
							1,311,983.05		
2017	Jan	1	(8,328.00)	14,777.70	4,581.01	1,323,013.76	239		
	Feb	2	(8,328.00)	8,683.49	4,619.52	1,327,988.77	238		
	Mar	3	(8,328.00)	16,782.07	4,636.89	1,341,079.74	237		
	Apr	4	(8,349.36)	5,719.53	4,678.01	1,343,127.92	236		
	May	5	(8,503.50)	24,817.89	4,718.24	1,364,160.55	235		
	Jun	6	(8,542.00)	6,216.56	4,759.13	1,366,594.24	234		
	Jul	7	(8,941.10)	63,948.99	4,867.73	1,426,469.87	233		
	Aug	8	(9,058.40)	18,751.13	4,997.68	1,441,160.27	232		
	Sep	9	(9,221.00)	25,913.59	5,061.19	1,462,914.05	231		
	Oct	10	(9,341.15)	19,091.77	5,125.03	1,477,789.70	230		
	Nov	11	(9,476.72)	21,487.14	5,180.92	1,494,981.03	229		
	Dec	12	(13,924.81)	64,634.06	5,308.51	1,550,998.79	228		
2018	Jan	13	(9,975.10)	15,883.25	5,425.89	1,562,332.82	227		
	Feb	14	(9,994.35)	5,286.00	5,446.93	1,563,071.40	226		
	Mar	15	(10,102.57)	16,955.05	5,469.69	1,575,393.56	225		
	Apr	16	(10,156.79)	21,448.87	5,388.71	1,592,074.36	224		
	May	17	(10,228.71)	11,293.17	5,428.13	1,598,566.95	223		
	Jun	18	(10,311.61)	10,559.19	5,448.87	1,604,263.40	222		
	Jul	19	(10,424.77)	17,635.90	5,480.15	1,616,954.69	221		
	Aug	20	(10,523.38)	17,806.13	5,523.53	1,629,760.96	220		
	Sep	21	(10,596.04)	11,271.81	5,555.92	1,635,992.65	219		
	Oct	22	(10,729.07)	20,573.94	5,592.79	1,651,430.30	218		
	Nov	23	(10,767.12)	5,867.28	5,620.27	1,652,150.73	217		
	Dec	24	(10,873.86)	16,405.89	5,640.51	1,663,323.27	216		
2019	Jan	25	(10,899.77)	3,970.00	5,657.35	1,662,050.85	215		
	Feb	26	(10,931.43)	4,835.12	5,654.43	1,661,608.98	214		
	Mar	27	(11,020.59)	13,576.59	5,667.67	1,669,832.65	213		
	Apr	28	(11,050.74)	4,575.67	6,069.18	1,669,426.77	212		
	May	29	(11,376.15)	12,049.84	6,080.72	1,676,181.17	211		
	Jun	30	(11,652.52)	40,794.65	6,157.16	1,711,480.46	210		
	Jul	31	(11,696.45)	6,463.72	6,223.11	1,712,470.84	209		
	Aug	32	(11,720.30)	3,498.19	6,221.28	1,710,470.01	208		
	Sep	33	(11,762.01)	6,098.21	6,218.65	1,711,024.86	207		
	Oct	34	(11,779.19)	2,504.00	6,214.09	1,707,963.76	206		
	Nov	35	(11,855.44)	11,076.00	6,218.42	1,713,402.73	205		
	Dec	36	(11,946.14)	17,193.98	6,249.20	1,724,899.77	204		
2020	Jan	37	(11,974.19)	36,795.92	6,326.71	1,756,048.21	203		
	Feb	38	(12,464.28)	33,532.48	6,433.30	1,783,549.71	202		
	Mar	39	(12,927.10)	66,346.12	6,592.36	1,843,561.09	201		
	Apr	40	(12,927.10)		6,690.10	1,837,324.09	200		
	May	41	(12,927.10)		6,667.38	1,831,064.38	199		
	Jun	42	(12,927.10)		6,644.59	1,824,781.86	198		
	Jul	43	(12,927.10)		6,621.71	1,818,476.48	197		
	Aug	44	(12,927.10)		6,598.75	1,812,148.13	196		
	Sep	45	(12,927.10)		6,575.70	1,805,796.73	195		
	Oct	46	(12,927.10)		6,552.57	1,799,422.20	194		
	Nov	47	(12,927.10)		6,529.36	1,793,024.46	193		
	Dec	48	(12,927.10)		6,506.06	1,786,603.42	192		
2036	Jan	229	(12,927.10)		529.23	139,392.81	11		
	Feb	230	(12,927.10)		484.08	126,949.80	10		
	Mar	231	(12,927.10)		438.77	114,461.47	9		
	Apr	232	(12,927.10)		393.29	101,927.67	8		
	May	233	(12,927.10)		347.65	89,348.22	7		
	Jun	234	(12,927.10)		301.84	76,722.96	6		
	Jul	235	(12,927.10)		255.86	64,051.72	5		
	Aug	236	(12,927.10)		209.72	51,334.34	4		
	Sep	237	(12,927.10)		163.40	38,570.65	3		
	Oct	238	(12,927.10)		116.92	25,760.47	2		
	Nov	239	(12,927.10)		70.27	12,903.65	1		
	Dec	240	(12,927.10)		23.45	(0.00)	0		
			(3,008,428.44)			971,324.51			

CERTIFICATE OF SERVICE

Docket No. 20-035-14

I hereby certify that on May 11, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

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