

July 16, 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 Administrator

RE: Docket No. 20-035-26
Solar Photovoltaic Incentive Program (Schedule 107) 2020 Annual Report
Reply Comments

On June 1, 2020, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment Period (“Notice”) requesting comments on Rocky Mountain Power’s (“Company”) June 1, 2020 annual report of the updated results from the Solar Photovoltaic Incentive Program offered through Electric Service Schedule No. 107 (“Report”). On July 3, 2020 the Division of Public Utilities (“Division”) and the Office of Consumer Services (“Office”) each filed comments. Both the Division and the Office recommend that the Commission acknowledge the Report as meeting the reporting requirements.

The Division noted approximately \$36k of expired deposits in CY 2015 were missing from the report and recommended the Company revise its Table 4 in this report and Table 1 in its Third Annual STEP Status Report in Docket No. 20-035-21 to include the expired deposits mistakenly omitted. Consistent with the Division’s recommendation, the Company hereby submits a revised report with the corrected Table 4 to reflect the expired deposits in 2015. The Company notes that it also plans to file a corrected Table 1, page 19.0 in the STEP Report Docket as suggested by the Division. The Company appreciates the efforts of the Division and Office in their review of the Company’s annual Solar Photovoltaic Incentive Program (Schedule 107) reports.

Sincerely,



Joelle Steward
Vice President, Regulation

CC: Service List - Docket No. 20-035-26



Utah Solar Incentive Program

2020 Annual Report

June 1, 2020

Revised July 16, 2020

Executive Summary

In Docket No. 11-035-104, Rocky Mountain Power (“Company”) received approval to offer an expanded Solar Photovoltaic Incentive program. On August 10, 2012, Rocky Mountain Power filed an Application for Approval with the Public Service Commission of Utah (“Commission”) requesting authority to implement a Solar Incentive Pilot program (“Program”), which was approved by the Commission on October 1, 2012. In the initial order approving the Program, the Commission directed the Company to provide annual reports on the Program containing information on the number of applications, the number and size of completed projects, generation data for large systems, and the number, if any, of surrendered deposits. This is the seventh report provided pursuant to the Commission’s direction and presents information on the program results and account balances through April 30, 2020. This report provides summarized information from the 2013, 2014, 2015 and 2016 Program Years. Pursuant to Section 54-7-12.8(4) of Senate Bill 115 passed in the 2016 Utah state legislature the Program has ended and the Company stopped taking new applications for solar incentive program incentives on December 31, 2016.

Goals of the Program

The intent of this Program initially was to encourage the development of 60 Megawatts (MW) of distributed solar generation capacity over the 5+ years of the program. In order to accomplish this, Rocky Mountain Power provided a rebate style incentive to customers who installed distributed solar generation facilities after being accepted into the program. With the cancelation of the program prior to the final year, the total program capacity target was reduced to 44.5 MWs. In total the program incentivized the installation of 30.28 MWs.

Summary of Program Results

The following tables summarize the results from the Utah Solar Incentive Program. Table 1 below shows the total number of completed projects, while Table 2 shows the total incentivized kW of the completed projects.

Table 1. Completed Projects

Program Year	Residential	Small Non-Res	Large Non-Res	Total
2013	130	98	7	235
2014	140	90	11	241
2015	140	215	14	369
2016	141	202	19	362
Program Total	551	605	51	1,207

Table 2. Installed Capacity kW_{CSI-AC}

Program Year	Residential	Small Non-Res	Large Non-Res	Total
2013	358 kW	1,752 kW	2,383 kW	4,493 kW
2014	447 kW	1,565 kW	3,729 kW	5,741 kW
2015	516 kW	3,954 kW	4,212 kW	8,682 kW
2016	528 kW	4,135 kW	6,629 kW	11,292 kW
Program Total	1,849 kW	11,406 kW	16,953 kW	30,208 kW

All project totals reflected in the tables above are final.

Surrendered Deposits

Table 3. Surrendered Deposits

Program Year		Residential	Small Non-Res	Large Non-Res	Total
2013	Quantity	43	72	5	120
	Amount	\$4,300.00	\$25,738.18	\$18,506.80	\$48,544.98
2014	Quantity	46	93	9	148
	Amount	\$4,600.00	\$33,435.78	\$40,915.84	\$78,951.62
2015	Quantity	39	100	7	146
	Amount	\$3,900.00	\$41,701.24	\$37,687.82	\$83,289.06
2016	Quantity	43	118	14	175
	Amount	\$4,300.00	\$50,846.31	\$132,058.38	\$187,204.69
Total	Quantity	171	383	35	589
	Amount	\$17,100.00	\$151,721.51	\$229,168.84	\$397,990.35

All surrendered deposits amounts reflected in the table above are final.

System Specific Information

Attachment A of this document includes more specific information for completed projects that received funding through the Utah Solar Incentive Program. Specifically included in the attachment is the size of the system in both kW_{DC} and kW_{CSI-AC} quantities, the amount of incentive the project received, the general location of each system, and the amount of Renewable Energy Credits the company has been deemed to receive from each project.

Production Meter Data

Attachment B of this document includes the available production meter data for completed large non-residential projects

Program Account Summary

Table 4. USIP Account Summary

Utah Solar Incentive Program Account - Through April 2020										
	Program Total	2012	2013	2014	2015	2016	2017	2018	2019	2020
Program Revenue	(25,269,989)	(961,324)	(6,293,704)	(6,320,828)	(6,317,639)	(6,323,285)	(308,633)	-	227,376	1,028,048
Program Expenditures:										
Incentive		-	981,796	2,328,676	3,292,006	4,884,763	4,766,963	3,459,713	2,317,571	613,859
Program Administration		-	253,665	322,664	173,248	412,866	94,788	27,098	13,807	679
Marketing		55,005	35,744	25,005	14,515	336	-	-	-	-
Program Development		30,748	99,140	577	-	-	-	-	-	-
Expired Deposits		-	-	-	-	(103,963)	(99,568)	-	(157,638)	-
Cool Keeper program		-	-	-	-	(200,000)	-	-	-	-
Total Expenditures	23,645,952	86,653	1,370,345	2,677,912	3,479,769	4,994,002	4,762,183	3,486,811	2,173,740	614,538
Interest	(3,533,932)	(5,995)	(219,165)	(473,909)	(721,712)	(685,628)	(627,425)	(569,938)	(147,937)	(82,224)
USIP Account Balance (Sch. 107 only)	(5,157,970)									

	Order	Program Total	2012	2013	2014	2015	2016	2017	2018	2019	2020
Program Revenue		(25,269,989)	(961,324)	(6,293,704)	(6,320,828)	(6,317,639)	(6,323,285)	(308,633)		227,376	1,028,048
Program Expenditures:											
Incentive	331190; 338901	22,645,346	-	981,796	2,328,676	3,292,006	4,884,763	4,766,963	3,459,713	2,317,571	613,859
Program Administration	331191; 338902	1,298,815	-	253,665	322,664	173,248	412,866	94,788	27,098	13,807	679
Marketing	331192; 338903	132,495	55,905	35,744	25,995	14,515	336	-	-	-	-
Program Development	331193; 338904	130,465	30,748	99,140	577	-	-	-	-	-	-
Expired Deposits	331194; 338905	(397,990)	-	-	-	(36,821)	(103,963)	(99,568)	-	(157,638)	-
Cool Keeper program	408641	-	-	-	-	-	-	-	-	-	-
Cool Keeper program		(200,000)	-	-	-	-	(200,000)	-	-	-	-
Total Expenditures		23,609,131	86,653	1,370,345	2,677,912	3,442,948	4,994,002	4,762,182	3,486,811	2,173,740	614,538
Interest		(3,533,932)	(5,995)	(219,165)	(473,909)	(721,712)	(685,628)	(627,425)	(569,938)	(147,937)	(82,224)
USIP Account Balance		(5,194,790)									

Expired Deposits: The expired deposits in Table 4 reflect the timing of when they were surrendered and transferred to the USIP account. The amounts shown in Table 3 above are reported in the year the customer applied to the program.

Reconciliation to the Annual STEP Report: The information in Table 4 was also provided as Table 1 on page 19.0 of the Company's most recent annual STEP report for calendar year 2019 in Docket No. 20-035-21 ("STEP Report"). Table 4 above and Table 1 on page 19.0 of the STEP Report are consistent except that this report also provides information for January through April of 2020.

Projected Expenditures

Table 5. USIP Projected Expenditures

	May- Dec 2020				
	Total	2021 Total	2022 Total	2023 Total	Program Totals
Administration	\$ 5,100.00	\$ 15,900.00	\$ 15,900.00	\$ 14,300.00	\$ 51,200.00
Incentive Payouts	\$ 1,362,687.48	\$ 1,184,331.85	\$ 668,101.91	\$ -	\$ 3,215,121.23
Total Program Costs	\$ 1,367,787.48	\$ 1,200,231.85	\$ 684,001.91	\$ 14,300.00	\$ 3,266,321.23

Renewable Energy Certificates

Consistent with the Order in Docket No. 11-035-104, the Company is tracking the proportional share of renewable energy attributes or Renewable Energy Certificates (RECs) generated by systems that receive an incentive that are designated to be used for the benefit of all Rocky Mountain Power ratepayers. Due to the administrative complexity and expense of registering the small distributed generation facilities through the Western Renewable Energy Generation

Information System (WREGIS), this program is not currently creating RECs that can be transferred or retired.

Participating customers who are interested in creating RECs through registration with WREGIS are permitted to do so under the tariff. If the customer chooses to do so, they are obligated to transfer a portion of the RECs to the Company. At this point, no customers have selected this option.

Table 6. REC Quantity - Program Inception through May 2020

	PY 2013	PY 2014	PY 2015	PY 2016	Total
Quantity	7,317	7,447	9,676	8,634	33,074

Detail for Table 6 is available in Attachment A.

USIP Program Revenue Surplus Refund

In the Docket No. 19-035-T12, the Company requested and received approval for a refund of surplus revenues that were previously collected to fund the USIP program through December 2016. On August 20, 2019 the Commission approved a refund of \$3.06 million in surplus revenue collected through Schedule 107 through a reduction in Electric Service Schedule No. 196 Sustainable Transportation and Energy Plan (“STEP”) Cost Adjustment Pilot Program rates over one year beginning November 1, 2019. Table 7 below provides the monthly refund amounts that have been credited to customers through April 20, 2020.

Table 7. USIP Program Revenue Surplus Refund:			
USIP Refund through April 2020			
		2019	2020
Program Revenue Refund per Month			
	January	-	360,899
	February	-	233,928
	March	-	218,759
	April	-	214,462
	May	-	-
	June	-	-
	July	-	-
	August	-	-
	September	-	-
	October	-	-
	November	-	-
	December	227,376	-
Total Refund		227,376	1,028,048
USIP Program Total Refund to Date		1,255,424	



Utah Solar Incentive Program

2020 Annual Report

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Total Refund		227,376	1,028,048
USIP Program Total Refund to Date		1,255,424	

CERTIFICATE OF SERVICE

Docket No. 20-035-26

I hereby certify that on July 16, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Cheryl Murray cmurray@utah.gov

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Rocky Mountain Power

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Katie Savarin
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