

August 20, 2020

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Administrator

**RE: Docket No. 20-035-32**  
Rocky Mountain Power's Customer Owned Generation and Net Metering Report  
and Attachment A for the Period April 1, 2019 through March 31, 2020  
*Reply Comments*

On July 6, 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") July 1, 2020 Customer Owned Generation Net Metering Report and Attachment A for the period April 1, 2019 through March 31, 2020 ("Report"). On August 5, 2020, the Division of Public Utilities ("Division") filed comments. Consistent with the Notice, the Company submits reply comments below.

In its comments, the Division recommends the Commission acknowledge the Report as meeting the reporting requirements, contingent on the Company making the corrections the Division noted in its discovery request DPU DR 1. Accordingly, the Company submits with its reply comments revised versions of the 2019 Interconnection Report (Attachment C), 2019 Customer Generation Detail Report (Attachment A) and Net Metering Excess Energy Evaluation (Attachment B) containing the corrections. The Company appreciates the Division's continued review of the Company's annual Customer Owned Generation and Net Metering Reports.

In its cover letter accompanying the Report, the Company reported \$286,569.42 as the value of excess generation credits from customers taking service on Electric Service Schedule No. 135 ("Schedule 135"). Due to rounding in the calculation noted by the Division in discovery, the value of Schedule 135 excess credits is \$286,237.26. As also noted by the Company in its cover letter of the Report, the Company is evaluating whether or not the Home Electric Lifeline Program ("HELP") monthly bill credit level is adequate to provide incremental value as directed by the Commission in Docket No. 18-035-39. Due to the COVID-19 public health emergency, the Company believes the number of customers who qualify for the HELP monthly credit could increase in the near term. Since the full effect on the HELP program of the public health emergency is not yet known, the Company does not recommend an adjustment to the credit at this time, but continues to monitor the account balance for a possible recommendation at a later date.

Utah Public Service Commission

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Sincerely,

A handwritten signature in blue ink that reads "Joelle Steward". The signature is written in a cursive style with a large initial "J" and "S".

Joelle Steward

Vice President, Regulation

CC: Service List - Docket No. 20-035-32

Attachment A  
Revised 2019 Customer Generation Detail Report

**THIS ATTACHMENT IS VOLUMINOUS  
AND IS PROVIDED IN EXCEL FORMAT  
ONLY**

## Attachment B

### Revised Net Metering Excess Energy Evaluation

Attachment B- 2020 Customer Generation Report

Net Metering Excess Energy Valuation

Revised August 20, 2020	
Onpeak	Hrs
Hrs Per Day (6am to 10pm)	16
Days Per Week	6
<b>Total</b>	<b>96</b>
Offpeak (10pm to 6am)	8
Days	6
<b>Total</b>	<b>48</b>
Sunday	24
<b>Total</b>	<b>72</b>
Total Hours	168
Reconcile 7 * 24	168

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

2019 Winter (Apr, May) Docket No 18-035-T02	Percent	Sch. 37	Calc	Allocation (2 mo)	cents per kWh
Onpeak Rate	0.57	1.896	1.08	0.166666667	0.18
Offpeak Rate	0.43	1.660	0.71	0.166666667	0.12
2019 Summer (Jun, Jul, Aug, Sep) Docket No 19-035-T07	Percent	Sch. 37	Calc	Allocation (4 mo)	cents per kWh
Onpeak Rate	0.57	4.679	2.67	0.333333333	0.89
Offpeak Rate	0.43	2.261	0.97	0.333333333	0.32
2019 Winter (Oct, Nov, Dec) Docket No 19-035-T07	Percent	Sch. 37	Calc	Allocation (3 mo)	cents per kWh
Onpeak Rate	0.57	2.578	1.47	0.25	0.37
Offpeak Rate	0.43	2.402	1.03	0.25	0.26
2020 Winter ( Jan, Feb, Mar) Docket No 19-035-T07	Percent	Sch. 37	Calc	Allocation (3 mo)	cents per kWh
Onpeak Rate	0.57	1.920	1.09	0.25	0.27
Offpeak Rate	0.43	1.715	0.74	0.25	0.18

Total Avoided Cost (per kWh)	\$0.0260
Annualized Billing Period (12 months)	\$ 286,237.26
Customer	31,039
	11,021,901

Attachment C  
Revised 2019 Interconnection Report

**Rocky Mountain Power  
Customer Generation Report  
For the period April 1, 2019 to March 31, 2020**

highlighted cells contain corrected data (8/20/20)

**1. Number of Customer Generation Systems (Data for report compiled on 6/23/2020)**

<b>Net Metering Facilities by Resource Type (Schedule 135)</b>				
Resource	Facilities as of March 31, 2019	New Facilities April 1, 2019 to March 31, 2020	Total Facilities	New Facilities January 1, 2019 to December 31, 2019
Solar	30961	0	30961	73
Wind	50	0	50	
Solar and Wind	20	0	20	
Other	0	0	0	
Hydro	7	0	7	
Fuel Cell	1	0	1	
<b>Total</b>	<b>31039</b>	<b>0</b>	<b>31039</b>	<b>73</b>

<b>Customer Generation Facilities by Resource Type (Schedule 136)</b>			
Resource	Facilities as of March 31, 2019	New Facilities April 1, 2019 to March 31, 2020	Total Facilities
Solar	3825	7772	11597
Wind	0		0
Solar and Wind	0		0
Other	0		0
Hydro	0		0
Fuel Cell	0		0
<b>Total</b>	<b>3825</b>	<b>7772</b>	<b>11597</b>

<b>Non-Net Metering Facilities by Resource Type</b>			
Resource	Facilities as of March 31, 2019	New Facilities April 1, 2019 to March 31, 2020	Total Facilities
Solar	17	1	18
Wind	1	0	1
Solar and Wind	0	0	0
Hydro	22	0	22
Thermal	4	0	4
Gas	8	0	8
Fuel Cell	0	0	0
Battery Storage	1	1	2
<b>Total</b>	<b>53</b>	<b>2</b>	<b>55</b>

**Historic to December 31, 2009**

The information provided for non-net metering facilities represents the Company's best efforts to identify generation facilities that have been approved and are interconnected to PacifiCorp's distribution system. PacifiCorp has reviewed the generation facilities within the Balancing Authority and eliminated those that are interconnected to third parties or to the Company's transmission system. This list may not be complete because previously there were no requirements to maintain records based upon the point of interconnection with the distribution system.

**2. Individual Capacity of Each Installation**

See Attachment A



**Rocky Mountain Power  
Customer Generation Report  
For the period April 1, 2019 to March 31, 2020**

**3. Total kW Combined Capacity**

<b>Net Metering Generation Capacity by Resource Type (kW) (Schedule 135)</b>				
Resource	Facilities as of March 31, 2019	New Facilities April 1, 2019 to March 31, 2020	Total Facilities	New Facilities January 1, 2019 to December 31, 2019
Solar	249,883.00	0.00	249,883.00	2,774.65
Wind	213.12	0.00	213.12	
Solar and Wind	264.24	0.00	264.24	
Other	0.00	0.00	0.00	
Hydro	126.12	0.00	126.12	
Fuel Cell	15.00	0.00	15.00	
<b>Total</b>	<b>250,501.48</b>	<b>0.00</b>	<b>250,501.48</b>	<b>2,774.65</b>

<b>Customer Generation Capacity by Resource Type (kW) (Schedule 136)</b>			
Resource	Facilities as of March 31, 2019	New Facilities April 1, 2019 to March 31, 2020	Total Facilities
Solar	27,771.53	62,235.48	90,007.00
Wind	0.00		0.00
Solar and Wind	0.00		0.00
Other	0.00		0.00
Hydro	0.00		0.00
Fuel Cell	0.00		0.00
<b>Total</b>	<b>27,771.53</b>	<b>62,235.48</b>	<b>90,007.00</b>

<b>Non-Net Metering Generation Capacity by Resource Type (MW)</b>			
Resource	Facilities as of March 31, 2019	New Facilities April 1, 2019 to March 31, 2020	Total Facilities
Solar	44.695	0.65	45.345
Wind	0.04	0	0.04
Solar and Wind	0	0	0
Hydro	36.96	0	36.96
Thermal	42.5	0	42.5
Gas	8.255	0	8.255
Fuel Cell	0	0	0
Battery Storage	0.25	1	1.25
<b>Total</b>	<b>132.7</b>	<b>1.65</b>	<b>134.35</b>

**4. Number of Expired Credits per Customer**  
See Attachment A

**4a. Net Metering Excess Energy Valuation**  
See Attachment B

**5. Total Value of Expired Credits (as reported on June 23, 2020)**

**Expired Credits at End of Annualized Period (Schedule 135)**

Customers	kWh	Value	Total Value
31,039	11,021,901	\$0.0260	\$ 286,237.25

**Expired Credits at End of Annualized Period (Schedule 136)**

Customers	kWh	Total Value
11,597	2,631,397	\$ 240,551.87

**Rocky Mountain Power  
Customer Generation Report  
For the period April 1, 2019 to March 31, 2020**

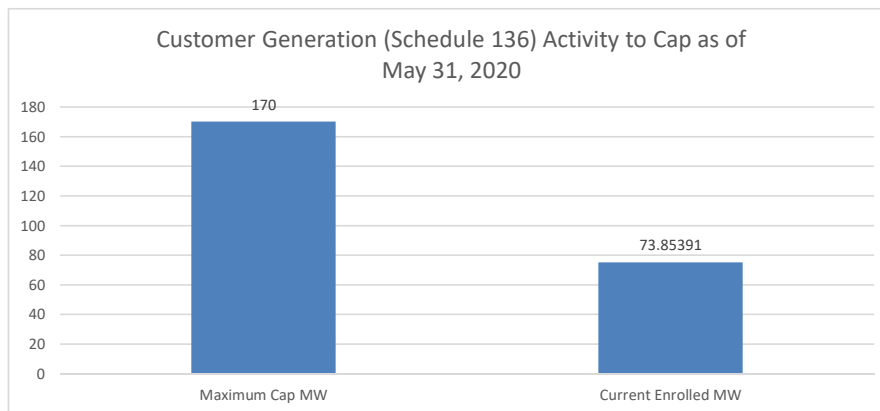
**6. Excess Net Metering Generation per Month**

Month	Schedule 135	Schedule 136
Apr-19	5,259,039	1,894,192
May-19	11,396,843	2,660,913
Jun-19	10,830,826	3,158,235
Jul-19	8,383,561	3,195,295
Aug-19	5,099,464	2,559,631
Sep-19	4,469,424	2,989,934
Oct-19	6,121,820	3,489,716
Nov-19	2,783,100	3,108,631
Dec-19	601,663	1,549,774
Jan-20	447,989	1,220,382
Feb-20	784,130	2,142,037
Mar-20	3,718,982	4,324,094
<b>Total</b>	<b>59,896,841</b>	<b>32,292,834</b>

**7. Unforeseen Problems or Barriers in the Tariff.**

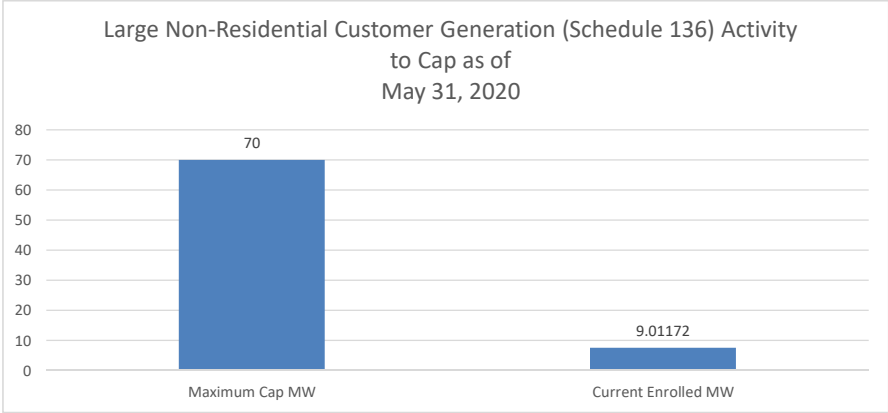
There are no unforeseen problems or barriers.

**8. Measurement to Cap**



**Rocky Mountain Power  
Customer Generation Report  
For the period April 1, 2019 to March 31, 2020**

**9. Measurement to Cap**



**CERTIFICATE OF SERVICE**

Docket No. 20-035-32

I hereby certify that on August 20, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

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**Rocky Mountain Power**

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Katie Savarin  
Coordinator, Regulatory Operations