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Salt Lake City, Utah 84116

May 11, 2021

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 2020 Annual Report of the Blue Sky Program – Docket No. 21-035-21

On March 31, 2021, 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 26, 2021, and May 11, 2021, respectively. The Division of Public Utilities (“Division”) filed comments April 21, 2021. Rocky Mountain Power (“Company”) provides these reply comments in response to the Division’s comments.

The Division concluded in their comments that the 2020 Annual Blue Sky Report (“2020 Report”) substantially complies with Commission Orders and reporting requirements, pending the addition of a description of each community project. The Division also requested that future reports also include whether community projects will serve low-income/underserved communities, as well as the percentage of Blue Sky funds awarded to each project relative to the project total.

The Company is agreeable to the Division’s requests, however it is not always clear to what degree projects may serve low-income or underserved communities. Accordingly, the Company will include this information whenever possible for each project.

Attached hereto as Exhibit A is an updated 2020 Report, with the requested information added under the Project Commitments detail section for all in progress projects and the three projects that completed in 2020. The Company believes the updated 2020 Report substantially complies with the Commission’s Order, reporting requirements, and the Division’s requests.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow".

Michael S. Snow
Manager, Regulatory Affairs

Enclosure

Exhibit A

2020 Blue Sky Block and Bulk Program - Summary Report

Program Management Commentary

Customer counts continue to increase year-to-year. Block sales have decreased as customers are not purchasing as many blocks per customer to cover their usage. With the increase in kWh per block the Blue Sky program in Utah supported 372 million kWh in renewable energy. No critical risks identified at this time.

Program Sales Summary

	2018	2019	2020	2018-19 Growth %	2019-20 Growth %
Total Company Block Sales	3,403,975	3,842,426	3,728,109	12.9%	-3.0%
Total Utah Block Sales	1,644,891	1,932,156	1,860,732	17.5%	-3.7%
Total Company Program Revenues	\$4,721,907	\$4,947,709	\$5,727,504	4.8%	15.8%
Total Utah Program Revenues	\$2,656,517	\$2,742,865	\$2,829,088	3.3%	3.1%
Total Company Year End Customer Counts	74,805	77,642	83,805	↑ 4%	↑ 8%
Total Utah Year End Customer Counts	47,137	48,632	51,709	↑ 3%	↑ 6%
Total Company REC's Supported	340,398	384,243	745,621	12.9%	94.0%
Total Utah REC's Supported	164,489	193,215	372,146	17.5%	92.6%

Program Expenses Summary

	2018	2019	2020	2018-19 Variance	2019-20 Variance
Total Company Program Expenses	\$982,892	\$1,064,513	\$1,126,396	8.3%	5.8%
Total Utah Program Expenses	\$403,134	\$390,177	\$440,296	-3.2%	12.8%

Renewable Energy Certificate (REC) Status

Net RECs Needed for 2020 Block Sales	745,622
Total RECs Purchased for 2020 Block Sales	642,739
Balance	-102,883

2019 Green-E Audit Completed June 2020; Certification in good standing. Program invoice details will be submitted to the Center for Resource Solutions (CRS) for the 2020 audit cycle when all RY2020 RECs have been received.

Utah Project Commitments

	Amount
Open UT Project Commitments	\$2,340,997
New 2021 UT Project Commitments	\$66,861
Total Project Commitments	\$2,407,858

Utah Liability Account Balance Reconciliation

Jan 2020 Liability Account Balance	\$8,663,360	+
2020 Net Revenue	\$2,829,011	+
2020 Interest Revenue	\$336,377	+
-	-\$440,296	2020 Program Expenses
-	-\$1,805,098	2020 REC Invoices Paid (2019 and 2020 Fulfillment)
-	-\$2,457,104	2020 Project Award Distributions
Dec 2020 Liability Account Balance =	\$7,126,250	
-	-\$2,407,858	Project Commitments
-	-\$354,234	RECs Balance Estimate (To Be Paid in 2021)
Available Uncommitted Funds =	\$4,364,158	

2020 Program Marketing and Communications Highlights

BLUE SKY LEGACY - GREEN BUSINESS AWARDS

Four business customers were recognized in October 2020 for their long-standing Blue Sky partnerships. Westminster College, Staker Parson Companies, JANS Mountain Outfitters, and Uintah Brewing were presented the Blue Sky Legacy Award. Link to Article:

<https://www.utahbusiness.com/2020-green-business-awards/>

2020 BLUE SKY EVENT HIGHLIGHTS

Several renewable energy grant projects were completed during 2020 despite the pandemic. Blue Sky celebrated 20 years and was featured in the following press releases.

[PCTV Mountain Connections Show](#) [Utah Business](#)

2020 COMPLETED BLUE SKY GRANT PROJECTS

Blessed Sacrament Catholic School	Spy Hop
Centro Civico	St Thomas Aquinas
Community Rebuilds	The INN Between
Salt Lake City Boys & Girls Club	Utah Department of Transportation
Salt Lake School District - Meadowlark Elementary	Utah State University
SLC Corporation - Sorenson Building	Wasatch Waldorf Charter School
Southern Utah Wilderness Alliance	

Hill Air Force Base

This Blue Sky Build project was completed in March 2021 with Blue Sky funds paying for the installation of the solar array installed at Hill Air Force Base. The project is a 350 kW solar photovoltaic array with 310 kW serving the base and 40 kW serving the museum. Project was budgeted for \$1.4m and is expected to come in under budget. Ribbon cutting planned for May 2021.

EVENTS AND COMMUNICATIONS

Blue Sky was featured at different events during 2020 including sponsorship of the Zoolights! at Hogle Zoo. Blue Sky also sponsored the greening of holiday lights at the Hogle Zoo, the Gallivan Center, the Downtown Alliance, Park City and Moab City. Blue Sky provided a booth at the 2020 Spring Home Show where participants could use virtual reality to see windmills in motion.

[Spring 2020 Forecast Newsletter](#)

[Fall 2020 Forecast Newsletter](#)

[Blue Sky Digital Catalog](#)

Events	Estimated Attendance	Promotional Items	Cost
Award Celebrations (3)	50-300 each	450 Sunglasses @ 0.87 each	\$ 391.50
Outreach Events (2)	10,000	1400 Sunglasses @ 0.87 each	\$ 1,218.00
		500 Reusable Straws @ 2.90 each	\$ 1,450.00
			\$ 3,059.50

2020 Blue Sky Block and Bulk Program Dashboard

[Back to Summary](#)

BLOCKS and REVENUE

State	Blocks Sold	Gross Rev (No Int)	% of Revenue
CA	44,495	\$86,202.01	1.51%
ID	33,909	\$65,175.81	1.14%
OR	1,452,574	\$2,155,432.84	37.63%
UT	1,860,732	\$2,829,088.50	49.39%
WA	218,373	\$363,027.54	6.34%
WY	118,025	\$228,577.51	3.99%
Grand Total	3,728,109	\$5,727,504.21	100.00%

CUSTOMER COUNTS

Month	Cust Counts	% Counts
Dec	83,805	100.00%
CA	2,078	2.48%
ID	1,875	2.24%
OR	16,143	19.26%
UT	51,709	61.70%
WA	6,543	7.81%
WY	5,457	6.51%

2020 PROJECT COMMITMENTS

State	Count of Project Name	Sum of Project \$ Committed
CA	1	\$136,856
ID		\$0
OR	13	\$1,316,720
UT	16	\$2,531,940
WA	4	\$393,503
WY	5	\$342,421
Grand Total	39	\$4,721,440

UTAH PROGRAM EXPENSE DETAIL

Program Nam (Multiple Items)

Expense	Exp Category							
By State	Prod Mgmt	Administration	Communication	Business Partnerships	Fulfillment	Cust Ed/Outreach	Sales Collateral	Grand Total
UT	\$177,697.67	\$41,058.70	\$87,382.33	\$31,791.29	\$55,185.41	\$41,590.71	\$5,589.50	\$440,295.61
Jan	\$18,972.12	\$17,834.59	\$2,815.83	\$6,344.51	\$3,769.98	\$6,769.00	\$353.50	\$56,859.53
Feb	\$17,874.18	\$2,499.44	\$2,815.83	\$1,444.51	\$3,769.98	\$4,827.95	\$368.50	\$33,600.39
Mar	\$16,051.93	-\$2,218.94	\$4,558.18	\$1,645.97	\$5,023.44	\$16,786.42	\$346.50	\$42,193.50
Apr	\$15,783.62	\$2,599.06	\$23,840.71	\$1,645.97	\$4,308.84	\$1,431.53	\$422.00	\$50,031.73
May	\$15,725.92	\$2,517.06	\$2,927.00	\$1,645.97	\$4,213.84	\$246.27	\$481.00	\$27,757.06
Jun	\$12,911.81	\$2,558.06	\$2,927.00	\$1,645.97	\$4,213.84	\$384.03	\$397.50	\$25,038.21
Jul	\$13,380.47	\$2,517.06	\$2,927.00	\$2,132.91	\$5,750.91	\$532.43	\$409.50	\$27,650.28
Aug	\$13,135.99	\$2,517.06	\$5,532.95	\$1,645.97	\$4,213.84	\$3,681.72	\$492.00	\$31,219.53
Sep	\$13,394.61	\$2,684.13	\$2,927.00	\$1,645.97	\$4,213.84	\$355.80	\$666.00	\$25,887.35
Oct	\$16,358.45	\$2,517.06	\$9,823.61	\$1,765.60	\$4,213.84	\$769.60	\$570.50	\$36,018.66
Nov	\$12,702.29	\$2,517.06	\$14,732.90	\$8,581.97	\$4,213.84	\$5,805.96	\$519.00	\$49,073.02
Dec	\$11,406.28	\$2,517.06	\$11,554.32	\$1,645.97	\$7,279.22		\$563.50	\$34,966.35
Grand Total	\$177,697.67	\$41,058.70	\$87,382.33	\$31,791.29	\$55,185.41	\$41,590.71	\$5,589.50	\$440,295.61

TOTAL PROGRAM EXPENSE DETAIL

Program Nam (Multiple Items)

Expense	Exp Category							
By State	Prod Mgmt	Administration	Communication	Business Partnerships	Fulfillment	Cust Ed/Outreach	Sales Collateral	Grand Total
Jan	\$31,725.58	\$28,107.16	\$4,910.25	\$9,872.50	\$6,574.10	\$28,415.65	\$578.00	\$110,183.24
Feb	\$27,807.86	\$35,599.74	\$4,910.25	\$4,972.50	\$6,574.10	\$4,859.00	\$554.00	\$85,277.45
Mar	\$37,200.91	\$83.98	\$7,053.56	\$5,021.25	\$9,338.46	\$18,000.05	\$567.50	\$77,265.71
Apr	\$25,961.82	\$5,411.98	\$28,625.04	\$5,021.25	\$7,736.23	\$1,598.56	\$622.50	\$74,977.38
May	\$26,618.67	\$10,663.98	\$5,271.25	\$5,021.25	\$7,588.74	\$80,328.40	\$708.50	\$136,200.79
Jun	\$13,988.97	\$4,573.98	\$5,271.25	\$5,021.25	\$7,588.74	\$23,428.89	\$635.00	\$60,508.08
Jul	\$36,144.54	\$4,532.98	\$5,271.25	\$8,605.00	\$10,320.22	\$21,856.25	\$648.00	\$87,378.24
Aug	\$25,694.03	\$5,083.98	\$8,181.25	\$5,021.25	\$7,588.74	\$33,156.83	\$809.50	\$85,535.58
Sep	\$28,008.80	\$4,709.98	\$5,271.25	\$5,021.25	\$7,588.74	\$32,304.76	\$1,016.00	\$83,920.78
Oct	\$26,516.03	\$4,532.98	\$12,967.16	\$5,140.88	\$7,588.74	\$52,999.86	\$926.00	\$110,671.65
Nov	\$27,840.73	\$10,412.98	\$18,221.25	\$11,957.25	\$7,588.74	\$30,816.06	\$856.50	\$107,693.51
Dec	\$21,748.97	\$27,140.98	\$14,905.15	\$5,021.25	\$14,362.04	\$22,694.15	\$911.00	\$106,783.54
Grand Total	\$329,256.91	\$140,854.70	\$120,858.91	\$75,696.88	\$100,437.59	\$350,458.46	\$8,832.50	\$1,126,395.95

UTAH INTEREST REVENUE & LIABILITY ACCT BAL

Month	Average Balance	Interest Revenue
Jan	\$8,733,083.44	\$31,803
Feb	\$8,834,561.04	\$28,565
Mar	\$8,781,460.83	\$28,393
Apr	\$8,709,080.65	\$28,159
May	\$8,716,082.76	\$28,182
Jun	\$8,846,291.85	\$28,603
Jul	\$9,055,468.76	\$29,279
Aug	\$8,947,188.94	\$28,929
Sep	\$8,769,346.06	\$28,354
Oct	\$8,566,283.61	\$27,698
Nov	\$8,361,567.03	\$27,036
Dec	\$7,748,066.32	\$21,375

REC PURCHASES IN 2020

State	UT
Month Paid	Green Tag Purchases
Jan	\$37,419.12
Mar	\$150,824.16
Apr	\$136,534.34
May	\$214,144.41
Jul	\$55,312.10
Aug	\$59,302.61
Sep	\$196,938.72
Oct	\$90,871.99
Nov	\$100,023.36
Dec	\$446,895.92
Grand Total	\$1,488,266.73

2020 Blue Sky Block and Bulk Program - Project Commitments

Utah Project Commitments

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[Return to Dashboard](#)
[Available Funds Criteria](#)

Existing Project Name	City	Technology	Size (kW)	Committed Funds	Award month/year	Status
Centro Civico	Salt Lake City	Solar	64.6	\$54,540	March-18	Completed
SLC Corporation - Sorenson Building	Salt Lake City	Solar	115	\$140,000	March-18	Completed
SpYHop	Salt Lake City	Solar	40.9	\$77,472	March-18	Completed
Utah Department of Transportation	Taylorville	Solar	176.2	\$246,630	March-18	Completed
Utah State University	Logan	Solar	100	\$200,495	March-18	Completed
Salt Lake City Boys & Girls Club	Salt Lake City	Solar	96.6	\$209,116	January-19	Completed
The INN Between	Salt Lake City	Solar	136.3	\$230,661	January-19	Completed
Salt Lake School District - Meadowlark Elementary	Salt Lake City	Solar	42	\$82,300	June-19	Completed
Wasatch Waldorf Charter School	Holladay	Solar	155	\$204,336	June-19	Completed
Community Rebuilds	Moab	Solar	16.32	\$36,954	May-20	Completed
Southern Utah Wilderness Alliance	Salt Lake City	Solar	9.6	\$24,858	May-20	Completed
St. Thomas Aquinas	Hyde Park	Solar	80	\$143,339	May-20	Completed
Blessed Sacrament Catholic School	Salt Lake City	Solar	50	\$112,152	December-19	Completed
Utah Community Action - South Salt Lake Building	South Salt Lake	Solar	46.25	\$108,608	December-19	In Progress
Egyptian Theatre	Park City	Solar	23.7	\$53,543	January-20	In Progress
Lewiston Elementary School	Lewiston	Solar	326.9	\$409,995	May-20	In Progress
Summit Elementary School	Smithfield	Solar	168.6	\$227,260	May-20	In Progress
UCA Head Start Kearns Building	Kearns	Solar	46.25	\$98,391	May-20	In Progress
USU Moab	Moab	Solar	178	\$282,628	May-20	In Progress
Episcopal Church of the Good Shepherd	Ogden	Solar	25	\$56,409	September-20	In Progress
Loveland Living Planet Aquarium	Draper	Solar	65	\$128,257	September-20	In Progress
Mt. Olympus Presbyterian Church	Holladay	Solar	71.5	\$140,669	September-20	In Progress
Pamela's Place	Salt Lake City	Solar	35.8	\$65,920	September-20	In Progress
St Mark's Cathedral	Salt Lake City	Solar	90.1	\$175,000	September-20	In Progress
Catholic Community Services of Utah	Ogden	Solar	50	\$106,419	November-20	In Progress
Blue Sky Build (HAFB)	Ogden	Solar	300	\$1,400,000.00	June-17	In Progress
				remaining for HAFB		
				\$487,898.00		
				Projects without Blue Sky Build		
				\$3,615,952.00		
				Total with Blue Sky Build		
				\$5,015,952.00		
				Open Blue Sky projects		
				\$1,853,099.00		
				Open Blue Sky projects/Build		
				\$2,340,997.00		

Blue Sky Grant Applications received in 2020	
# Applications Received in 2020	20
# Applications Awarded	13
# Applications Declined	7

2021 - New Projects Awarded

New Project Name	City	Technology	Size (kW)	Committed Funds	Award month/year	Status
Wasatch Mountain Institute - Rock Cliff Nature Center	Francis	Solar	32.7	\$66,861	February-21	In Progress
				\$66,861		

2021 New Applications Received/In Process:	3
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[Wasatch Mountain Institute - Rock Cliff Nature Center](#)
[State of Utah TSOB Canopy Solar Project](#)
[Itineris Early College High School](#)

New Project Name	City	Technology	Size (kW)	Committed Funds	Percentage Funded
Community Rebuilds - Community Rebuilds launched in Moab and built their pilot home in 2010. A 51 solar panel array was installed on the roof of the bunkhouse that will generate 12,126 kWh annually. Community Rebuilds builds homes that are low carbon efficient modern natural buildings. They include adobe floors, earthen plasters, tadelakt shower walls and passive solar design. This project was completed in September 2020.	Moab, UT	Solar	16.32	\$36,954.00	79.3%
Southern Utah Wilderness Alliance - SUWA is an independent organization working to defend America's Redrock wilderness from oil and gas development, unnecessary road construction, rampant off-road vehicle use, and other threats to Utah's wilderness-quality lands. They are committed to working towards becoming a more environmentally conscious organization. They have been a Blue Sky Champion since 2007. The system is located at their main office in Salt Lake City. This project was completed in November 2020.	Salt Lake City, UT	Solar	9.6	\$24,858.00	80.0%
St. Thomas Aquinas - This is the only Catholic church in Cache and Rich County and is the first Blue Sky project in Hyde Park. The population of the church is approximately 70% Latino and 30% Anglo. The church provides a free hot meal to people on the first and third Saturday of the month, serving 250 or more at each meal. They have an after school backpack program where they provide food for needy children to take home over the weekend. This project was completed in September 2020.	Hyde Park, UT	Solar	80	\$143,339.00	74.1%
Utah Community Action - South Salt Lake Building - UCA helps remove barriers to poverty through their core programs: Adult education, HEAT, Nutrition, Weatherization, Housing, and Head Start. This building is where the central kitchen is located to produce meals for all Head Start children. As a way to "pay it forward", UCA has identified through our Adult Education Program a solar curriculum focused on building a workforce within this industry. This would include network opportunities for employment. Through our Head Start Program, we reach a young developing population that will become critical in executing and living within our current long term renewable energy visions.	South Salt Lake, UT	Solar	46.25	\$108,608	100.0%
Egyptian Theatre - this is a staple in the Park City community and they want to do their part to reduce their environmental impact. The theatre holds youth group programs and also recently became involved with Recycle Utah. The system was installed March 2021, but have not finished the final report.	Park City, UT	Solar	24.32	\$53,543.00	80.0%
Lewiston Elementary School - The Cache County school system is comprised of over 18,000 students. The district leads the state in language arts and math proficiency and earned the highest proficiency scores out of any school district in the state of Utah on the 2018 SAGE tests. The district is implementing a \$14,000,000 Energy Savings Performance Contract with Johnson Controls. The project is estimated to save 321 metric tons of greenhouse gases per year.	Lewiston, UT	Solar	326.9	\$409,995.00	50.0%
Summit Elementary School - This elementary school is part of Cache County School District. This project is part of their Energy Savings Performance Contract. The array will supply 70% of the school's usage.	Smithfield, UT	Solar	168.6	\$227,260.00	50.0%
UCA Head Start Kearns Building - This building was selected to install the solar array because in 2016 Salt Lake County place-based initiative study found that Kearns had the highest unemployment rates in the county, lower median incomes, several significant health issues to address, and an insufficiency in public and private investments. Through the six programs operated by UCA and through the 35 specific Head Start locations, they have the opportunity to conduct large outreach to educate and illustrate how renewable energy benefits the neighborhood, whether that's through economic savings, positive environmental impact, or the increase of property values. By demonstrating how utilizing renewable forms of energy can save families significant amounts of money in addition to a range of other positive outcomes we can shift the outlook of our communities.	Kearns, UT	Solar	46.25	\$98,391.00	100.0%
USU Moab - This solar array will be installed on canopy covered parking. USU has a goal of making its entire campus system carbon neutral by 2050. All new buildings are designed to either meet LEED certification or Living Building Challenge Petal certification. The new Moab campus building is designed to have state-of-the-art sustainability features in order to both reduce its utilization of traditional power sources and to serve as an example of sustainable building design in rural Utah.	Moab, UT	Solar	209	\$282,628	58.8%
Episcopal Church of the Good Shepherd The install will be a 25kW Solar array on 2 buildings. The church hosts a food pantry and help feed the homeless and low income each Wednesday. This will be the first historic building in downtown Ogden to add visible solar panels. This was the 4th time they applied for a grant, they were able to raise some funds to help with the installation.	Ogden, UT	Solar	50	\$56,409.00	80.1%
Loveland Living Planet Aquarium - This solar array will be an addition to the array they completed in 2013. The array will fill up all of the roof space to complete the renewable energy for the building. This is a great education opportunity for the residents of Utah as well as visitors from other states.	Draper, UT	Solar	65	\$128,257.00	89.5%
Mt. Olympus Presbyterian Church - this church has a daycare and kindergarten as well as holds an after school program. The church supports Burma/Myanmar refugees as well as the Grace Deal Christian Church.	Holladay, UT	Solar	71.5	\$140,669.00	82.4%
Pamela's Place - Is a new five story facility that will function as permanent supportive housing complex for those in need, with a specific focus on helping people with disabilities. It provides transitional housing and supportive amenities to people navigating out of homelessness in the Salt Lake Valley. It was named after Pamela Adkinson a long time homeless advocate.	Salt Lake City, UT	Solar	29.2	\$65,920.00	86.8%
St Mark's Cathedral - This is the third oldest Episcopal cathedral in the United States and Utah's second oldest continuously used house of worship. Its mission is to feed the hungry, nurse the sick, and spiritual comfort those in need. Their food pantry feeds 30,000 people annually and is continuously growing.	Salt Lake City, UT	Solar	90.06	\$175,000.00	76.2%
Catholic Community Services of Utah - CCS in Ogden supports low-income individuals and families struggling with food insecurity. The Joyce Hansen Hall Food Bank is the largest assistance pantry in the region which typically helps over 19,000 people per year.	Ogden, UT	Solar	50	\$106,419.00	87.6%
HAFB: This Blue Sky Build project is scheduled to be completed in early 2021 with Blue Sky funds paying for the installation of the solar array and interconnection. This is located on a 1.6-acre site near Roy, Utah. The site is abutting HAF, the Hill Aerospace Museum (kiosk located in museum lobby), and new lease development area (w/ Northrup Grumman). The project is 310 kW to the base and 40 kW to museum. Groundbreaking planned for May 2021 (could change with COVID-19)	Roy, UT	Solar	350	\$1,400,000.00	100.0%

Project Standards and Evaluation Criteria

Rocky Mountain Power favors projects and activities that:

Result in the production of renewable electricity
Support communities through a strong education and public engagement component
Support a Blue Sky customer project/community
Provide strong environmental and economic benefit to local communities and Rocky Mountain Power/Pacific Power customers
Build regional capability
Take advantage of other funding sources available to support the project
Are owned by a non-profit organization, school, tribal government, religious institution or other community-oriented organization

Each application is reviewed with the following consideration given to the individual project. Does the project:

Assist in the creation of new renewable electricity sources within PacifiCorp's Rocky Mountain Power/Pacific Power service areas
Stimulate renewable energy development by increasing the capacity of individuals, community groups or other organizations to undertake and support renewable energy development in their respective communities
Encourage research and development of renewable energy sources
Promote education in the community on new renewable energy generation and increase knowledge of Blue Sky program

The following criteria are considered equally - however if any one measure carries more weight it is community benefit:

<p>Timeframe - How quickly will the project move forward? Is the proposed installation timeframe reasonable? Projects are expected to be on line within 12 months, unless agreed to otherwise. Extensions are granted on a project-by-project basis (e.g. installations associated with new construction are expected to be online with 24 months.) What is the probability of completion within the proposed timeframe? Have potential delay risks been identified and properly mitigated? Has an adequate amount of pre-development work been completed? Has the applicant had preliminary conversations with the utility regarding net metering/interconnection? Are there significant challenges associated with interconnection? Have all required permits and approvals been accurately identified? Are any critical approvals pending or unlikely to be secured?</p>
<p>Site - Is the project sponsor ready to proceed with the project (i.e. efforts undertaken related to feasibility, financial agreements, permitting). Can the site effectively host a renewable energy project? Is permitting required? Have rights, options or leases been granted to secure site control? What is the probability of the project being built?</p>
<p>Financing - Is there an adequate financial structure that will ensure it's completion within the timeframe specified? Is the customer or vendor a reliable business partner? Is there adequate financial structure that will ensure the project's completion within the allotted timeframe? Does the applicant have longevity at the site? Does the applicant appear to be financially stable/reliable? Are there undue financial risks which would put the project in jeopardy? Have potential risks been identified and mitigated? Does the applicant have a financial stake in the project that ensures it's completion.</p>
<p>Project Champion/Project Team - What is the experience of the developer? Is there a dedicated project proponent with a long-term stake in the project's success and who will work to overcome obstacles in making this project happen? What is the relevant experience of the project team? Have all required team members been identified? Is the organization and project team effective and responsive?</p>
<p>Additionality - Can these funds be used to make the difference in bringing additional renewable resources on line? Are Blue Sky funds required for the project to be successful? Is the proportion of cost requested reasonable? Are there other secured or pending sources of funding besides Blue Sky?</p>
<p>Fuel Source - Is the renewable resource eligible under the tariff - wind, solar, geothermal, certified low-impact hydro, pipeline or irrigation canal hydroelectric system, wave energy, low-emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol or copper chrome arsenic to help facilitate the commercial application of renewable energy technologies.</p>
<p>Technology - Is the planned energy source eligible? Is the proposed technology appropriate for the site? Is the technology proven and established and is the equipment covered under warranty? If not, is there research and development value to the project? Are there undue technical risks putting the project completion in jeopardy? Have technical risks been mitigated? Is the energy generation estimate accurate and supported by well-documented calculations? Is the capacity factor reasonable? Has maintenance of the system been properly addressed to ensure long-term operations? Does the project encourage new or emerging technologies?</p>
<p>Availability - Is the project owner willing to allocate RECs generated by the project to the Blue Sky program?</p>
<p>Cost - Are the total project costs and cost-share requested reasonable based on industry standards/for the proposed technology/size/location? Were multiple bids received from competitive contractors? Does the budget represent the maximum value for the price?</p>
<p>Geography - Proportional contribution to Pacific Power/Rocky Mountain Power service areas: CA, ID, OR, UT, WA, WY based on Blue Sky option customer subscription levels</p>
<p>Community Benefit - Can benefits be leveraged for the community and Blue Sky customers? What are the secondary environmental, social and economic benefits? Does the project help build regional renewable energy expertise? Does it stimulate the regional renewable energy marketplace? Is the community aware of and supportive of the project? Is it likely that there will be negative impacts from this project? How will the facility help educate the community about the benefits of renewable energy and the Blue Sky program? How does the project tie into the mission of the host organization? Are the project goals consistent with those of the Blue Sky program? What is the level of community participation in the Blue Sky program where the project will be located? Is there a plan to recognize the Blue Sky program and participating customers for their contribution to the project? Does the project offer unique/new exposure to Blue Sky? Is the project highly visible?</p>

CERTIFICATE OF SERVICE

Docket No. 21-035-21

I hereby certify that on May 11, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

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