

September 23, 2021

***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. 21-035-46**  
Rocky Mountain Power's Rocky Mountain Power's 2021 Net Metering and  
Interconnection Report  
*Reply Comments*

On August 6, 2021, Rocky Mountain Power ("Company" or "RMP") filed its 2021 Net Metering and Interconnection Report for the Period of April 1, 2020 through March 31, 2021 ("Report"). On August 11, 2021, the Public Service Commission of Utah ("Commission") issued a Notice of Filing and Comment Period ("Notice") establishing a comment period for the Report. On September 8, 2021, the Division of Public Utilities ("Division") and Utah Clean Energy ("UCE") filed comments. Consistent with the Notice, the Company submits reply comments below.

***Response to the Division***

In its comments, the Division recommends the Commission acknowledge the Report as meeting the reporting requirements. The Division also requested that the Company provide supporting documentation for Section 6 of Attachment C in future reports. The Company agrees to provide the requested information, which will be included in future reports.

***Response to UCE***

In its comments, UCE makes five recommendations regarding the Report and one policy change regarding the use of expired credits from Electric Service Schedule No. 137 ("Schedule 137") customers. Company addresses each of these recommendations.

**UCE proposal #1** - Amend the Rate Glossary tab to clearly specify whether each rate schedule code applies to Schedule 135, 136, or 137 customers and whether it is a commercial, irrigation, or residential schedule.

The Company agrees to amend the rate glossary in future reports to provide the requested clarification.

**UCE proposal #2** Three rate schedules are included in individual customer records in Appendix A, but not included in the “Rate Glossary.” Those rate schedules are 08RNM6A135, 08CGM6A136, and 08CGR02137. Please include these in the Rate Glossary in future reports.

The Company agrees to amend the rate glossary in future reports to include the missing rate schedules.

**UCE proposal #3** The tab labeled “135-Appendix A” includes the Resource Type “239 Inactive Accounts with Expired Credits in 2020.” Please explain this designation.

Inactive accounts are accounts that interconnected in the last month of the reporting period but will not have expired credits to report until the following years’ report. However due to the timing of the billing cycle and the way the Company’s system tracks these accounts, they are pulled into the report which the Company removes so the expired credits are not double counted.

**UCE proposal #4** For facilities that have a mixed resource type (e.g. “solar & battery” or “solar & wind,”) please clarify whether the kilowatt capacity indicated in Appendix A represents the capacity of the solar, the secondary resource, or the combined capacity of both.

The Company clarifies that the kilowatt capacity indicated in Appendix A for the mixed resource type represents the combined capacity of both resources.

**UCE proposal #5** Appendix A includes a tab titled “Non-RMP Customers.” Please explain which customers are included in this tab and why they are represented in RMP’s Annual Report.

The non-RMP customers are facilities that are interconnected to the Company’s distribution system, but are not customers of Rocky Mountain Power. The Company includes these in the annual interconnection reports in accordance with Rule R746-312-16(1) that states each public utility shall maintain current records of interconnection, customer generation facilities showing size, location, generator type and the date of interconnection authorization. This includes all facilities that are interconnected to the distribution system, not just the customers of RMP, which was also clarified and noted by the Commission in their Report and Order Modifying Reporting Requirements on November 30, 2010.<sup>1</sup> The Company notes that the requirement for maintaining these records began December 31, 2009, so the report records prior to that date may not be complete.

### **UCE Proposal Regarding Use of Expired Credits from Schedule 137.**

UCE opposes the Company’s recommendation to credit the value of Schedule 137 expired credits to the Energy Balancing Account (“EBA”) consistent with the treatment of Electric Service Schedule No. 136. Instead, UCE proposes that the Schedule 137 credits should be returned to customers as a bill credit or deposited into the Home Electric Lifeline Account (“HELP”) for low-income customers consistent with the treatment of expired credits from Electric Service Schedule 135.

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<sup>1</sup> Docket Nos. 10-035-58, 08-035-T04, and 08-035-78, p 5.

As part of Docket No. 17-035-61, the proceeding that established Schedule 137, certain parties advocated for the elimination of annual expiration of credits from excess generation for Schedule 137 customers and proposed similar treatment that UCE advocates for here. In the October 30, 2020 Order, the Commission determined that:

If we were to eliminate annual expiration of accrued credits at this time, we would do so without any experience with how the ECR will influence the size of future CG systems. Given how challenging it would be to walk back from such a change, we consider it more reasonable to defer a decision on discontinuing annual expiration of credits until the effects of the ECR on system size can be evaluated empirically.<sup>2</sup>

The Commission went on to say that they expect the empirical evaluation to occur with the first annual export credit rate (“ECR”) update, which is scheduled to occur in the first part of 2022. The data presented in the Report provides information on Schedule 137 through April 30, 2021, which is only about six months of data for a new rate schedule that is still ramping up. UCE’s proposal is premature and should not be considered by the Commission until adequate data from Schedule 137 can be examined in a full evidentiary proceeding regarding the issue.

Sincerely,



Joelle Steward  
Vice President, Regulation

CC: Service List - Docket No. 21-035-46

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<sup>2</sup> Order at p. 20

**CERTIFICATE OF SERVICE**

Docket No. 21-035-46

I hereby certify that on September 23, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

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