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## Action Request Response

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Brenda Salter, Assistant Director  
Doug Wheelwright, Utility Technical Consultant Supervisor  
Bob Davis, Utility Technical Consultant

**Date:** September 15, 2025

**Re:** **Docket No. 25-035-42**, Rocky Mountain Power's 2025 Net Metering and Interconnection Report for the Period April 1, 2024, through March 31, 2025

## Recommendation (Acknowledge)

The Division of Public Utilities (Division) reviewed Rocky Mountain Power's (RMP) 2025 Net Metering, Customer Generation, and Interconnection Report (Report) for the annualized billing period ending March 31, 2025, and concludes that it complies with the Public Service Commission's (Commission) reporting requirements. The Division finds no outstanding issues and recommends the Commission acknowledge RMP's Report.

## Issue

On July 1, 2025, RMP filed its Motion for Emergency Waiver with the Commission asking for an extension until August 13, 2025, which was approved on July 17, 2025. On August 13, 2025, RMP filed its Report with the Commission along with Attachments A, B, C, D, and Workpapers 1. On July 13, 2025, the Commission asked the Division to review RMP's Report for compliance and make recommendations by September 12, 2025. On August 14, 2025, the Commission issued its Notice of Filing and Comment Period asking any interested person to submit comments on or before September 15, 2025.



## Background

In Docket No. 10-035-58, the Commission ordered that:<sup>1</sup>

The reporting requirements contained in R746-312-16 (Rule) replace the Company's net metering reporting requirements in Docket Nos. 08-035-T04 and 08-035-78 with the following exceptions and clarifications:

- a) All net metering interconnections must be noted in the annual report filed pursuant to the Rule;
- b) the information required by R746-312-16(2)(a) is the same cumulative information as provided in Attachment A of the Company's 2010 Report with the addition of the zip code, year of installation, and notation if the interconnection is a net metered resource;
- c) the Company's annual report filed pursuant to the Rule should provide all of the data required by the Rule through the end of the annualized billing period of the year the report is being submitted unless otherwise approved; and
- d) the Company is required to report information on the amount of net metering installed capacity relative to its net metering cap and any [unforeseen] problems or barriers in the tariff in its annual report filed pursuant to the Rule.

The reporting requirements contained in R746-312-16, Public Utility Maps, Records and Reports, state:

- (1) Each public utility shall maintain current records of interconnection customer generating facilities showing size, location, generator type, and date of interconnection authorization.
- (2) By July 1 of each year, the public utility shall submit to the commission an annual report with the following summary information for the previous calendar year:
  - (a) the total number of generating facilities approved and their associated attributes including resource type, generating capacity, and zip code of generating facility location;
  - (b) the total rated generating capacity of generating facilities by resource type;
  - (c) for net metering interconnections, the total net excess generation kilowatt-hours received from interconnection customers by month; and
  - (d) for net metering interconnections, the total amount of excess generation credits in kilowatt-hours, and their associated

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<sup>1</sup> *Commission Report and Order*, Docket No. 10-035-58, November 30, 2010, <https://pscdocs.utah.gov/electric/10docs/1003558/698561003558ROmrr.pdf>.

dollar value that have expired at the end of each annualized billing period.

The Commission's September 24, 2015, Order in Docket No. 15-035-64, required future customer-owned generation and net metering reports to provide:

- (1) An explanation of the calculation of the price attributed to expired net excess generation credits.
- (2) A column indicating the rate schedule under which each customer is taking service, or alternatively, the revenue class of each customer.<sup>2</sup>

In Docket No. 17-035-31, RMP agreed to several recommendations made by the parties. RMP has incorporated the changes to its report as well as those proposed by the Division and Office of Consumer Services (OCS) to encompass the transitional distributed generation relating to Docket No. 14-035-114 and include:

- (1) A table indicating which customer classes (or schedules) are represented by the "Customer Rate Schedule" codes in Attachment A.
- (2) An explanation as to why, as a general matter, some customers may have a kilowatt-hour credit in a year prior to the customer's interconnection date.
- (3) A statement that the required net metering excess energy valuation is found on Attachment B or elsewhere if the Company changes the reporting configuration.<sup>3</sup>

On September 29, 2017, the Commission issued its Order for the Net Metering Compliance proceeding in Docket No. 14-035-114. The Commission approved the parties' stipulation, effectively ending the Net Metering program to new entrants as of November 15, 2017.<sup>4</sup> The Stipulation allows Schedule No. 135, Net Metering Service, customers to remain on Schedule No. 135 until December 31, 2035. Schedule No. 136, Transition Program for Customer Generators, is for customers who filed an application on or after November 15, 2017. Schedule No. 136 customers may remain on Schedule No. 136 until December 31, 2032.<sup>5</sup> The stipulation created a need to amend certain parts of the Net Metering Report to

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<sup>2</sup> *Commission Order*, Docket No. 15-035-64, September 24, 2015, at 5, <https://pscdocs.utah.gov/electric/15docs/1503564/2694861503564o.pdf>.

<sup>3</sup> *Correspondence from Gary L. Widerburg*, Docket No. 17-035-31, November 28, 2017, <https://pscdocs.utah.gov/electric/17docs/1703531/298130CorresWiderburg11-28-2017.pdf>.

<sup>4</sup> *Order Approving Settlement Stipulation*, Docket No. 14-035-114, September 29, 2017, <https://pscdocs.utah.gov/electric/14docs/14035114/29703614035114oass9-29-2017.pdf>.

<sup>5</sup> The Transition Program for Customer Generators ended at the conclusion of Docket No. 17-035-61.

include both traditional net metering customers under Schedule No. 135 and transitional customers under Schedule No. 136. RMP met with interested parties to discuss changes to the report that would fulfill the reporting requirements established by the Commission.<sup>6</sup>

In Docket No. 18-035-28, RMP agreed to the DPU's recommendation to add Section 9 to its report illustrating the *Measurement to Cap* for large non-residential customers under Schedule No. 136. Additionally, RMP agreed to identify the applicable tariff schedule when referring to net metering and customer generation in tables as recommended by the OCS.<sup>7</sup>

Paragraph 21 of the Settlement Stipulation in Docket No. 14-035-114, specified the treatment of surrendered excess export credits from Schedule No. 136 customers at the end of the annualized billing period be treated similar to Schedule No. 135 credits, or for *another use as determined by the Commission*.<sup>8</sup> The Commission opened Docket No. 18-035-39 to consider alternative uses for Schedule No. 135 surrendered excess export credits. The Commission issued its order on January 11, 2019, concluding that the current use of expired credits under Schedule No. 135 is reasonable. However, the Commission found that it was in the public interest to ensure that incremental value was being provided to low-income customers. The Commission directed RMP to grant a one-time credit to all Schedule 3 customers by dividing the \$159,840 value of the excess credits by the final count of Schedule No. 3 customers at the end of the April 2018 billing cycle.<sup>9</sup>

In its letter dated August 30, 2018, the Commission approved the parties' recommendation to apply Schedule No. 136 surrendered excess export credits towards the Energy Balancing Account (EBA).<sup>10</sup> In its Order for Docket No. 17-035-61, the Commission did not rule on the treatment of expired excess credits citing lack of evidence to do so and determined that Schedule No. 137 should include the same language for expired excess credits as Schedule Nos. 135 and 136 until such time that the parties conclude another use for the

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<sup>6</sup> Docket No. 17-035-31, *Supra* at note 3.

<sup>7</sup> *Rocky Mountain Power's Reply Comments*, Docket No. 18-035-28, August 16, 2018, <https://pscdocs.utah.gov/electric/18docs/1803528/303989RepCommRMP8-16-2018.pdf>.

<sup>8</sup> *Commission Order Approving Settlement Stipulation*, *Supra* note 3 at ¶¶ 21 and ¶ 39.

<sup>9</sup> *Order*, Docket No. 18-035-39, January 11, 2019, <https://pscdocs.utah.gov/electric/18docs/1803539/3061961803539o1-11-2019.pdf>.

<sup>10</sup> *Correspondence from Gary L. Widerburg*, Docket No. 18-035-28, August 30, 2018, <https://pscdocs.utah.gov/electric/18docs/1803528/304191CorresWiderburg8-30-2018.pdf>.

expired excess credits.<sup>11</sup> In Docket No. 21-035-46, the Commission concluded that the best use of expired excess credits remains to offset the EBA.<sup>12</sup>

## Discussion

Sections 1 and 3 of Attachment C report the number of facilities and generation for Schedules 135, 136, and 137. For the reporting period of April 1, 2024, through March 31, 2025, RMP reports 3,842 new facilities composed of 1 Schedule No. 135, 2 Schedule No. 136, and 3,839 Schedule No. 137 customers.<sup>13</sup> These additions compare to 5,524 new facilities reported during the same period last year for an overall decrease in additions of 30.4 percent. The new facility under Schedule No. 135 was due to a customer connecting to the grid during the reporting period that had originally been off grid when solar was installed in 1997.<sup>14</sup> The 2 new facilities reported under Schedule No. 136 were originally accounted for as part of the Solar metric. In this year's report, they were added to the Solar and Battery metric. Schedule No. 135 remained nearly the same at 30,811 facilities slightly down from last year's report of 30,877 due to adjustments from customers moving to Schedule No. 137, or for other reasons. The total facility count for Schedule Nos. 135, 136, and 137 is 75,271.<sup>15</sup> This represents a 5.2 percent increase over last year's report of 71,580.

As of March 31, 2025, RMP reports 658,743 kW of combined total generation. This is composed of 252,807 kW for Schedule No. 135, 154,058 kW for Schedule No. 136, and 251,878 kW for Schedule No. 137. The combined generation represents an increase of 7.3 percent from last year's reported 613,810 kW combined generation capacity.<sup>16</sup> The combined generation year-over-year increase from 2023 to 2024 was 11.3 percent. The 2025 Report illustrates a combined total *solar only* generation capacity as of March 31,

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<sup>11</sup> *Order*, Docket No. 17-035-61, October 30, 2020, at page 20,

<https://pscdocs.utah.gov/electric/17docs/1703561/3161911703561o10-30-2020.pdf>.

<sup>12</sup> *Correspondence from Gary L. Widerburg*, Docket No. 21-035-46, October 5, 2021,

<https://pscdocs.utah.gov/electric/21docs/2103546/320598AckLtrfromPSC10-5-2021.pdf>.

<sup>13</sup> *RMP 2025 Customer Generation and Interconnection Report*, Docket No. 25-035-42, August 13, 2025, Section 1, RMP Attachment C, <https://pscdocs.utah.gov/electric/25docs/2503542/341010RMP2025NetMtrngIntrcnctnRprt8-13-2025.pdf>.

<sup>14</sup> *Id.*, RMP Attachment D.

<sup>15</sup> Docket No. 25-035-42, *Supra* note 13, Section 1.

<sup>16</sup> *Id.*, Section 3.

2025, of 553,287 kW composed of Schedule Nos. 135, 136, and 137 compared to 508,840 kW in 2023. This represents a steady increase over the seven-year period or a constant average growth rate (CAGR) of 10.8 percent.<sup>17</sup> Illustration 1 shows the year-over-year, *solar only*, change.

**Illustration 1**

<b>Solar Only Generation Total Schedules 135 - 136 - 137</b>		
<b>Reporting Year</b>	<b>kW</b>	<b>Year/Year Change</b>
2019	275,412	
2020	337,647	22.6%
2021	392,767	16.3%
2022	442,133	12.6%
2023	508,840	15.1%
2024	339,410	-33.3%
2025	565,725	66.7%
<b>Total Chang</b>	<b>105.4%</b>	
<b>CAGR</b>		<b>10.8%</b>
<b>Average Year/Year Change</b>		<b>16.7%</b>
<b>Median Year/Year Change</b>		<b>15.7%</b>

RMP reported no changes to the Non-Net Metering customers from last year's count of 55. These numbers represent customer generators larger than 2 MW or connecting to the grid by other switchgear or inverter configurations. The total Non-Net Metering MW reported in 2022 remains at 134.35 MW for this filing.<sup>18</sup>

Section 5 of Attachment C reports the expired credits at the end of the annualization period for Schedule Nos. 135, 136, and 137. The historical Excess Energy Value per kWh used to calculate the value of expired credits from 2015 to the present Report for Schedule No. 135 customers is \$0.026, \$0.0183, \$0.0207, \$0.0221, \$0.026, \$0.019, \$0.0237, \$0.0407, \$0.0641, and \$0.0520, respectively, or an average of \$0.0292 per kWh. Expired credits for Schedule No. 135 customers is reported differently than Schedule Nos. 136 and 137 due to

<sup>17</sup> Docket No. 25-035-42, *Supra* note 13, Section 3, 2019 to present.

<sup>18</sup> *Id.*

the kWh per kWh credit to customer bills. RMP reports 30,811 Schedule No. 135 customers with 10,328,388 kWh of expired credits equating to \$537,201 in this year's report. This compares to last year's report of 30,877 customers with 14,350,500 kWh of expired credits equating to \$920,096.<sup>19</sup>

RMP reports and calculates the excess expired credits for Schedule Nos. 136 and 137 differently than those for Schedule No. 135. RMP does not calculate a value per kWh for Schedule No. 136 customers because the expired credit rates paid for excess generation vary by customer class from \$0.092 (residential) to \$0.034 (non-residential). Deriving a precise value for Schedule No. 136 expired generation from this is challenging because the expiring credits are an aggregation of numerous customer classes and generation amounts. In addition to the Schedule No. 135 customers, RMP reports 18,240 Schedule No. 136 customers with 6,763,447 kWh, and 26,218 Schedule No. 137 customers with 7,625,347 kWh with values of \$620,890 and \$529,123, respectively.<sup>20</sup> For comparison to rates paid to customers for excess generation, the Division calculates the average value per kWh for Schedule No. 136 expired credits by dividing the total value of \$620,890 by the 6,763,447 kWh, resulting in \$0.0918 per kWh. The Division notes that this average value is not indicative of the rate classes as customers within higher usage classes or higher rates, may have the majority of excess credits. The Division tracks this metric as part of its analysis of excess credits as a comparison to actual value per kWh to the average rate for Schedule No. 136 customers. The expired credit values for Schedule No. 137 customers do not vary and are based on a Value Added Avoided Cost calculated annually.<sup>21</sup> The average value for Schedule No. 137 expired credits for this reporting period is \$0.0694 per kWh.<sup>22</sup>

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<sup>19</sup> Id., Section 5.

<sup>20</sup> Docket No. 25-035-42, *Supra* note 13, Section 5. The Division continues to analyze excess and expired credits to monitor system sizing.

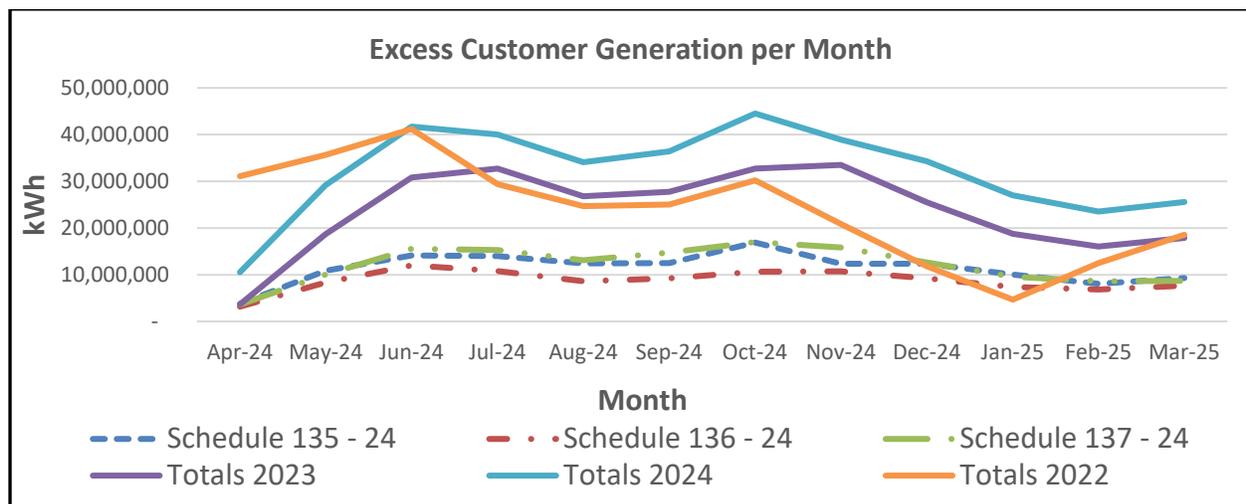
<sup>21</sup> Value Added Avoided Cost refers to one avoided value added to another for a final rate. In this case avoided energy is added to avoided generation capacity, avoided transmission capacity, and avoided distribution capacity which results in the final export credit rate.

<sup>22</sup> For example, RMP's response to DPU Data Request 2.2, Docket No. 22-035-38, the 660,134 kWh reported in Attachment C (Customer Generation Summary Report), Section 5 (Total Value of Expired Credits (as reported on June 22, 2022)) is the kWh equivalent figure for Schedule 137 based on the current average rate of 4.724 cents per kWh (Docket No. 22-035-T02). The calculation in Attachment A (Detail for each Interconnected Customer-Owned Generation, Including Expired Credit), tab "137 – Appendix A2" was based from the original export credit rate of 5.611 cents per kWh. If column I is updated to 4.724, the kWh

This year’s report has 47 relevant rate schedules composed of Schedule Nos. 135, 136, and 137 customer classes. Schedule No. 135 is kWh for kWh for all classes. Schedule No. 136 has 7 export rates across the various customer classes. Schedule No. 137 uses the same export credit rate for all classes.<sup>23</sup>

Section 6, Excess Net Metering Generation, illustrates the total excess export in kWh for each month for Schedule Nos. 135, 136, and 137 customers. The data in Section 6 provides some sense of how well customer systems are sized to meet their loads. The Division notes that many variables contribute to excess generation and concludes that this is a useful metric for distributed generation on RMP’s system. The data illustrates a combined excess generation of 385,639,671 kWh which is a 35.4 percent increase from last year’s reported 284,781,834 kWh across all three schedules year-over-year. The total excess generation is composed of Schedule No. 135 increase of 7.3 percent, Schedule No. 136 increase of 8.2 percent, and Schedule No. 137 decrease of 137.6 percent. Based on the current data and year-over-year trends, excess energy going to the grid is increasing for unidentifiable reasons. Illustration 2 demonstrates the excess generation profile for the 2025 reporting cycle.<sup>24</sup>

**Illustration 2**



equivalent will tie to the 660,134 kWh. Updating the rate used does not change the expired credit amount since that amount reflects what was calculated by the Company’s billing system.

<sup>23</sup> Docket No. 25-035-42, *Supra* note 13, Attachment A, Tab Rate Glossary.

<sup>24</sup> Docket No. 25-035-42, *Supra* note 13, Attachment C, Section 6.

The Division concludes that the introduction of Schedule No. 137 has not eliminated distributed generation uptake as customer numbers and generation continue to grow at a manageable rate year-over-year.

## **Conclusion**

The Division reviewed RMP's Report and concludes that RMP's filing complies with the Commission's reporting requirements and recommends the Commission acknowledge RMP's 2025 Customer Generation Net Metering Report for the annualized billing period ending March 31, 2025.

cc: Jana Saba, RMP  
Max Backlund, RMP  
Michele Beck, OCS  
Service List