

SPENCER J. COX  
Governor  
DEIDRE M. HENDERSON  
Lieutenant Governor



MARGARET W. BUSSE  
Executive Director

CHRIS PARKER  
Division Director

**Redacted**

## 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  
Savannah Torman, Utility Analyst

**Date:** April 16, 2026

**Re:** **Docket No. 26-035-16**, Rocky Mountain Power's 2025 Annual Report of the Subscriber Solar Program.

## Recommendation (Acknowledge)

The Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) acknowledge Rocky Mountain Power's (RMP or Company) Subscriber Solar Program (Program) Annual Report for the 2025 annual reporting period. The Program's subscription rate was 73.5 percent by the end of 2025. The Program's 2025 liability account ending balance of \$1,672,730.87 is \$104,308 less than the 2024 ending balance of \$1,777,038.88.

## Issue

On March 25, 2026, the Company filed its 2025 Annual Report with the Commission. On the same date, the Commission asked the Division to review the Company's filing for compliance and make recommendations by April 24, 2026. Subsequently, on March 27, 2026, the Commission issued its Notice of Filing and Comment Period asking any interested person to submit comments by April 27, 2026, with reply comments due by May 12, 2026.



Redacted

## Background

On September 15, 2015, the Company filed the parties' Settlement Agreement in Docket No. 15-035-61. The Settlement Agreement set forth parameters and operational guidelines for the Subscriber Solar Program. The Commission approved the settlement on October 21, 2015. Pursuant to the Commission's Order,<sup>1</sup> the Company is required to file an annual report of the Subscriber Solar Program, including various filing requirements, by March 31<sup>st</sup> of each year.

Subsequent correspondence<sup>2</sup> directed the Company to include the following items in its annual report: (1) the total number of kWh donated broken out by the various classes of participants; (2) the avoided cost rate; and (3) the total dollar value of the donated kWh.

RMP designed the Subscriber Solar Program (Program) around a [REDACTED] solar facility located in Holden, Utah. The final PPA contract price with the solar provider was [REDACTED]. The contract with the solar provider is based upon an average purchase of [REDACTED]. However, the solar facility can generate more than [REDACTED], in which case RMP purchases all the generation the facility produces and books the difference to the Company's Energy Balancing Account (EBA) as net power costs (NPC).

The Program offers Utah customers the opportunity to purchase 200 kilowatt-hour (kWh) blocks of electricity. The Program is offered through Schedule No. 73 for the Company's Electric Service Schedules 1, 2, 3, 6, 6A, 8, 9, 9A, and 23.<sup>3</sup>

## Discussion

RMP reports 1,864 block customers and 755 full coverage customers subscribed as of December 31, 2025. The Company purchased 44,265,128 kWh of generation and sold 32,390,200 kWh. The unsold 11,774,928 kWh of purchased generation was booked to the EBA for a value of \$621,716.20.

---

<sup>1</sup> *Application of Rocky Mountain Power for Approval of its Subscriber Solar Program (Schedule 73)*, Docket No. 15-035-61, Order at 7 (Oct. 21, 2015).

<sup>2</sup> Docket No. 15-035-61, Correspondence at 2 (Aug. 16, 2017)

<sup>3</sup> Rocky Mountain Power Electric Service Schedule No. 73, effective April 25, 2025

**Redacted**

The Company also reports donating 677,577 kWh of electricity, with a reported value of \$20,613.50. Separated by customer class, commercial customers received 570,307 kWh in donations; industrial customers received 2,160 kWh in donations; and residential customers received 105,090 kWh in donations. The reported avoided cost is \$0.0304 per kWh.

### **Reporting Concerns**

The Division notes a discrepancy in subscription reporting. Exhibit A reports the aforementioned 1,864 block customers and 755 full coverage customers (totaling 2,619 customers). Exhibit B reports [REDACTED] residential customers and [REDACTED] commercial customers (totaling [REDACTED] customers). The Division contacted the Company to gain insight into this discrepancy. The Company explained:

“The customer counts found in Exhibit A and Exhibit B come from differing sources. The Exhibit A customer count is determined by summing the enrolled account numbers at the end of the reporting year and differentiating which customers are enrolled for full coverage versus block coverage. The Exhibit B customer count is calculated based on the total kWh generated at the solar facility multiplied by assumptions tied to the size of a customer’s subscription and the distribution by customer classes. For this reason, the more accurate source is Exhibit A.”<sup>4</sup>

The Division is satisfied with this response and therefore concludes the official subscription number to be 2,619 customers.

The rate of subscribed customers and their associated electric consumption is also tied to the surplus of unused generation reported for 2025. The Company provided this explanation in the same email response as above:

“The Unsold Generation (Summary E24) and associated EBA Charge (Summary E25) values are tied to the how much solar energy the facility generated compared to how much we sold to customers. This value comes from the difference between the energy generated at the solar facility (2025 Dashboard P19) and the kWh that we invoiced to program participants (2025 Dashboard H20). Because the program was subscribed at [REDACTED] in 2025 compared to [REDACTED] in 2024, we saw an increase in Unsold Generation. The drop in subscriptions was mainly attributed to the attrition of multiple program

---

<sup>4</sup> Email response received by Michael Snow, Manager of Regulatory Affairs, on April 1, 2026.

**Redacted**

managers and the associated lack of attention and marketing the program would normally have had with the stability of a dedicated, knowledgeable program manager.”<sup>5</sup>

Exhibit A in the Company’s filing provides Program Expenses, which include the Program’s management/admin expenses and marketing expenses. Management/Admin expenses for 2025 were \$3,531, and marketing expenses were \$0, with all the expenses occurring from October-December 2025. In 2024, these values were \$32,124 and \$4,147 respectively. The Company’s explanation is therefore corroborated by the data provided in the report. While the reported subscription rates for 2025 were much lower than previous years, this is also the first time in the Program’s history that the subscription rate has fallen below [REDACTED], with the average rate from 2017-2024 hovering around [REDACTED].

Of greater concern is the significant increase in unsold generation of 11,774,928 kWh at a value of \$621,716.20 added to the EBA balance. Table 1 provides a comparison of previous years’ generation, sales, and EBA charges.

**Table 1. Program Performance (2020-2025)<sup>6</sup>**

	kWh Generated	kWh Sold	% Sold	Unsold Generation (kWh)	EBA Charge
<b>2020</b>	49,992,944	48,407,287	96.8	1,585,657	\$ 83,723
<b>2021</b>	48,263,412	47,361,700	98.1	901,712	\$ 47,610
<b>2022</b>	46,040,088	49,016,395	106.5	-2,976,307	\$ (157,149)
<b>2023</b>	40,758,963	47,224,325	115.9	-6,465,362	\$ (341,371)
<b>2024</b>	43,630,661	42,457,780	97.3	1,172,881	\$ 61,928
<b>5-Yr Avg</b>	45,737,214	46,893,497	102.9	-1,156,284	\$ (61,052)
<b>5-Yr Med</b>	46,040,088	47,361,700	98.1	901,712	\$ 47,610
<b>2025*</b>	44,265,128	32,490,200	73.4	11,774,928	\$ 621,716
*2025 numbers are not included in the 5-Yr Avg or 5-Yr Med Calculations					

Given the information provided herein, the Division concludes that the 2025 subscription rates, unsold generation and EBA charge to be anomalies. While these numbers are

<sup>5</sup> Email response received by Michael Snow, Manager of Regulatory Affairs, on April 1, 2026.

<sup>6</sup> Data sourced from Subscriber Solar Annual Reports, 2021-2026.

**Redacted**

concerning, Exhibit A of the Company's filing states: "The focus for 2026 will be to have the program fully subscribed with a robust waitlist by end of year."<sup>7</sup> The Division will continue to monitor the Program's performance in 2026 and onward to ensure the Program returns to normal functionality.

## **Conclusion**

The Division has reviewed the Company's Subscriber Solar Report for the 2025 annual reporting period. While Program subscriptions and generation sold have lagged compared to previous years, the Division is satisfied with the Company's explanation and evidence. The annual report has fulfilled the reporting requirements according to Commission requirements. The Division will continue to monitor the Program's outcomes in future reports to ensure satisfactory performance.

The Division recommends the Commission acknowledge Rocky Mountain Power's 2025 Subscriber Solar Status Report.<sup>8</sup>

cc: Michele Beck, Office of Consumer Services  
Michael Snow, Rocky Mountain Power

---

<sup>7</sup> Report at 6.

<sup>8</sup> The Division's recommendation in this docket does not preclude it from raising these issues in other dockets.