Public Service Commission of Wisconsin

Lon Roberts, Chairperson
Mike Huebsch, Commissioner
Rich Zipperer, Commissioner

4822 Madison Yards Way
P.O. Box 7854
Madison, WI 53707-7854

December 10, 2018

To the Parties:

Re: Application of Wisconsin Electric Power Company, as an Electric Public Utility, for Approval to Implement a Solar Now Pilot Tariff and a Dedicated Renewable Energy Resource Pilot Tariff — 6630-TE-102

Comments Due:	Address Comments To:
Tuesday, December 18, 2018 – 12:00 noon	**Steffany Powell Coker** Public Service Commission P.O. Box 7854 Madison, WI 53707-7854
This docket uses the Electronic Records Filing system (ERF).	

The Commission memorandum concerning Wisconsin Electric Power Company's proposed renewable energy programs is being provided to the parties for comment. Comments must be received by noon on Tuesday, December 18, 2018.

Party comments must be filed using the Commission's ERF system. The ERF system can be accessed through the Public Service Commission's web site at http://psc.wi.gov. Members of the public may file comments using the ERF system or may file an original in person or by mail at the Public Service Commission, 4822 Madison Yards Way, P.O. Box 7854, Madison, Wisconsin 53707-7854.

Please direct questions about this docket or requests for additional accommodations for the disabled to the Commission's docket coordinator, Sam Shannon at (608) 267-9816 or Sam.Shannon@wisconsin.gov.

Sincerely,

Steffany Powell Coker

Steffany Powell Coker
Secretary to the Commission

SPC:RSS:jar:jlt:DL: 01658282

Attachment

PUBLIC SERVICE COMMISSION OF WISCONSIN
Memorandum

December 10, 2018

FOR COMMISSION AGENDA

TO: The Commission

FROM: Martin R. Day, Administrator
Carrie Templeton, Assistant Administrator
Andrew Kell, Policy and Rate Analyst
Sam Shannon, Policy and Rate Analyst
Division of Energy Regulation

RE: Application of Wisconsin Electric Power Company, as an Electric Public Utility, for Approval to Implement a Solar Now Pilot Tariff and a Dedicated Renewable Energy Resource Pilot Tariff — 6630-TE-102

Suggested Minute: The Commission (approved/approved with conditions/did not approve) Wisconsin Electric Power Company's proposed Solar Now pilot and associated tariff.

The Commission (approved/approved with conditions/did not approve) Wisconsin Electric Power Company's proposed Dedicated Renewable Energy Resource pilot and associated tariff.

Introduction

On October 12, 2018, Wisconsin Electric Power Company (WEPCO) filed an application for two new pilot programs. (PSC REF#: 351616.) The first pilot program is a proposed solar hosting program for commercial and industrial customers, and the second pilot program is a proposed renewable energy rider for large commercial and industrial customers. The Commission issued a Notice of Investigation in this docket on November 1, 2018. (PSC REF#: 352570.) Citizens Utility Board of Wisconsin, RENEW Wisconsin, and Wisconsin Industrial Energy Group all requested and were granted intervention in this docket. (PSC REF#: 352753, PSC REF#: 353053, PSC REF#: 353386, and PSC REF#: 353837.) Additionally, the Environmental Law and Policy Center and Vote Solar requested to intervene out of time on

December 7, 2018.[1] (PSC REF#: 354922.) No party requested a hearing in this docket but the parties and those requesting party status are being afforded an opportunity to be heard through submission of comments on this memorandum. Additionally, as the date of this memorandum, the Commission has received several public comments in this docket. (PSC REF#: 354261, PSC REF#: 354327, PSC REF#: 354334, PSC REF#: 354348, and PSC REF#: 354924.)

The two programs will be discussed separately in this memorandum. All capacity units in this memorandum are expressed as alternating current rather than direct current, as payments and accounting treatment relates to energy production as interconnected to and injected on the alternating current electric grid.

Solar Now – Proposed Solar Hosting Program

Solar Now, the proposed solar hosting program, is an offering to commercial and industrial customers who wish to host solar photovoltaic (PV) arrays on their property. The primary rationale for customer program participation being that some customers may rather host solar energy for the community rather than use and pay for renewable energy. The arrays would be owned and operated by WEPCO, with all energy delivered to WEPCO's distribution system. Effectively, the program would create a 35 megawatt (MW) distributed solar generator in WEPCO's generation fleet. The program is open to all commercial and industrial customers, but 10 MW will be reserved for government and non-profit customers. No individual hosted array will be greater than 2.25 MW. WEPCO anticipates an all-in unit cost of $1,700/kilowatt associated with the program, which would equate to a total capital cost of $59,500,000.

[1] The Commission's Notice of Investigation permits existing parties 5 days in which to respond to these requests.

Lease Payments

Customers who wish to host one of the arrays would be paid a monthly lease payment by WEPCO for the duration of the service agreement. WEPCO proposes to set the lease payment to the cost of new entry (CONE) for the Midcontinent Independent System Operator, Inc. (MISO) load zone two for the planning year that the lease takes effect. For reference, the CONE price for the 2019-2020 Local Resource Zone 2 (LRZ 2)[2] is $87,170/MW-year[3], or $7,264.17/MW-month. The actual amount paid to customers would be the CONE price, times the size of the hosted array, times the MISO accredited capacity value for solar PV resources. This CONE value would be set upon signing the contract, and the host would receive the same equal monthly payments for hosting throughout the term of the contract.

The accredited capacity value for a solar PV system is defined in the MISO Resource Adequacy Business Practice Manual.[4] A solar PV system receives capacity accreditation for 50 percent of its nameplate capacity in the first year. After that, the capacity is set based on the performance of the array on a rolling 3-year average; specifically, the array's production in the hours between 2:00 p.m. and 4:00 p.m. CST every day during June, July, and August. WEPCO stated its intention is to perform this calculation on each individual system in the program, not on the performance of the entire 35 MW. This means that each participating customer will get an individualized lease payment based on the performance of the system that the customer hosts.

There is potential for the accredited capacity value for a solar PV system to change within the MISO market. The MISO Transmission Expansion Plan 2019 (MTEP19) Futures

---

[2] LRZ 2 represents American Transmission Company LLC's footprint in MISO.
[3] MISO results for 2019/2020 CONE values are posted here: https://cdn.misoenergy.org/20180912%20RASC%20Item%2004d%20CONE%20Filing%20Update273529.pdf.
[4] The current Resource Adequacy BPM is available at https://cdn.misoenergy.org//BPM%20011%20-%20Resource%20Adequacy110405.zip.

Development Workshop, dated March 20, 2018, indicated that while PV Solar received a 50 percent capacity credit in MTEP18, this may decrease in MTEP19.[5] As such, participating customers will need to take this into consideration when determining if the lease payment will be sufficient compensation in future years.

Economic Evaluation

Since the various arrays would be owned and operated by WEPCO, the assets would be recorded as regular generation assets. The lease payments to hosting customers would be recorded in account 550, Rents for Other Power Generation as an ongoing expense. Annual lease payments for the entire 35 MW in the first year of the program will be $1,525,475 assuming the entire system is installed in the current MISO planning year.

WEPCO provided a revenue requirement model for the total 35MW system as a response to CUB-1-1. (PSC REF#: 354803, PSC REF#: 354804.) The model assumed a combined capacity factor of 20.2 percent for the entire system, a 30-year depreciation life, and 2.0 percent inflation on operation and maintenance (O&M) costs and production Locational Marginal Pricing (LMP). The analysis of the embedded costs of the system are dependent on these assumptions. Also, the investment tax credit would help reduce the cost of the system to WEPCO's customers.

The individual arrays will be interconnected to WEPCO's distribution system. Due to the individual size limit, WEPCO can expect to see savings in the form of avoided transmission costs. Effectively, these arrays will reduce WEPCO's system load from the perspective of the transmission and wholesale energy system. This also means that the Solar Now system will reduce the amount of generation that WEPCO will need for its own needs. Commission staff

[5] MTEP19 Futures Development Workshop, March 20, 2018, Slide 15: https://cdn.misoenergy.org/20180320%20MTEP19%20Futures%20Workshop%20Presentation150635.pdf.

estimates the avoided cost of both these components to be $49.96/megawatt-hour (MWh) in the first year. Again, the long-term avoided cost would increase, depending on the inflation rates used for fuel and transmission costs, to the benefit of WEPCO's customers. Using WEPCO's assumptions and including transmission benefits, the projected lifetime energy cost of the system is $50.70/MWh.

Commission Review

One option for the Commission is to decline to take any action on this program. Essentially, Solar Now is a standard lease arrangement between WEPCO and property owners in its service territory. The proposed tariff is unusual in that it does not provide for any service to customers or contain rules governing the provision of service. This is in contrast to a standard community solar tariff where a utility provides a special form of electric service to customers.

As part of Commission staff's review, it looked at whether the facilities used for Solar Now would require Commission authorization for construction. Because each individual project is capped at 2.25 MW, the projected cost of each project is below the dollar threshold at which WEPCO would need prior authorization.[6] In other words, WEPCO could build these systems without prior Commission approval for construction. Additionally, WEPCO is requesting deferral accounting treatment and potential recovery of costs incurred in the interim between rate cases. This deferral request is further discussed in the next section. If WEPCO were to build these systems on its own and in the absence of an authorized deferral, any costs incurred between rate cases would not be recovered in rates.

Also, WEPCO does not need Commission approval to enter into lease agreements for siting of facilities under current Wisconsin statute or administrative code requirements. Utilities

[6] Wisconsin Stat. § 196.49(5g)(ar).

enter into similar arrangements without Commission review or approval; likewise, wind developers and utilities enter into lease agreements with property owners for hosting wind turbines without having a leasing tariff.

Commission Alternatives

Alternative One: Approve the proposed Solar Now program as filed.

Alternative Two: Decline to take action on the Solar Now program.

Alternative Three: Do not approve the Solar Now program.

Solar Now Deferral Request

WEPCO requests to defer the cost of the installed solar systems and the lease payments made to participating customers as part of this pilot program between the date that the pilot program is approved and the implementation of WEPCO's base rate changes, as approved by the Commission in WEPCOs next rate case proceeding.

Under staff Accounting Policy Statement of Position 94-01 (SOP 94-01), there are several criteria that Commission staff use to evaluate a request for deferral accounting treatment for a utility expenditure: (1) whether the cost is outside of the utility's control; (2) whether the cost is unusual and infrequently occurring; (3) whether the amount, if recognized in the year of expenditure, would cause the utility serious financial harm or significantly distort the current year's income; and (4) whether the immediate recognition of the expenditure would have a significant impact on ratepayers. These criteria can be considered individually or together with other criteria.

WEPCO provided Commission staff with justification for the deferral under SOP 94-01 in its response to a data request. (PSC REF#: 352461.)

1. The amount of the cost is outside the control of WEPCO. According to WEPCO's data request response, "Wisconsin Electric developed the Solar Now Pilot proposal in response to our customers' demand for Wisconsin-based renewable energy. The Solar Now pilot projects are customer directed and, as such, program costs will be outside of Wisconsin Electric's control both with respect to the timing of the installations and the amount of capacity installed." Commission staff notes that this is a voluntary tariff offering by WEPCO, giving WEPCO control over the timing and cost of the project.

2. The cost is unusual and infrequently occurring. According to WEPCO, "As a pilot, the proposed Solar Now program has not been done before and by its very nature is unusual and infrequently recurring."

3. There is potential for serious financial harm to the utility. WEPCO estimates the first year revenue requirement associated with the program to be $9,300,000 and states that "Not allowing these costs to be deferred would result in a dollar-for dollar reduction of the company's earnings, which, all things being equal, could have the negative impact reducing the amount of earnings available to be shared with Wisconsin Electric's customers through the earnings cap and sharing mechanism approved by the Commission to be in place during 2018 and 2019." While Commission staff does not dispute that denial of the deferral request would have a temporary negative impact on WEPCO's earnings and cash flows, the Commission may consider whether the potential financial harm is material, considering that WEPCO's estimate of the first year financial impact equates to less than five percent of WEPCO's authorized net income or annual dividends paid to its parent company.

4. Significant impact on ratepayers. WEPCO states, "The immediate recognition of the expenditures above would not cause significant ratepayer impact. The requested deferral of

incremental costs, if approved, would also not cause significant ratepayer impact. Rather, the deferral of these costs would balance the interests of the company and its non-participating customers because the company would obtain recovery of the costs of distributed solar generating facilities, while leveraging this pilot to learn how distributed generation could be used as a cost effective way to maintain or enhance reliable and cost effective delivery of electricity to its customers." For this deferral request, WEPCO did not request carrying costs. Commission staff agrees it is reasonable to exclude carrying costs should the Commission chose to approve the deferral request.

If the Commission authorizes WEPCO's deferral request, it may wish to do so with the express condition that the authorization is for accounting purposes only and does not bind the Commission to any specific treatment (i.e. recovery) for this item in any future proceeding involving rates or other matters before the Commission. In addition, should the deferral be granted, the Commission may wish to include a requirement that WEPCO provide further information and documentation regarding the costs and benefits to ratepayers of its Solar Now program to aid the Commission in its decision making regarding the recoverability of the deferral in a future rate case[7]

Commission Alternatives

Alternative One: Grant WEPCO's request for deferral accounting treatment for the first year of Solar Now expenses without conditions.

Alternative Two: Grant WEPCO's request for deferral accounting treatment for the first year of Solar Now expenses with conditions.

[7] In connection with the Commission's approval of Madison Gas and Electric's (MGE) request to implement a community solar pilot project, the Commission required MGE to submit information as to customer benefits to the extent it sought recovery of certain project costs in rates. (PSC REF#: 284022.)

Alternative Three: Do not grant WEPCO's request for deferral accounting treatment for Solar Now expense.

Dedicated Renewable Energy Resource Pilot Program – Proposed Renewable Energy Rider

The Dedicated Renewable Energy Resource (DRER) program would allow WEPCO to contract with large commercial and industrial customers and build specific renewable resources to serve its individual customer loads. An interested customer would discuss its organizational renewable energy goals with WEPCO, which would then guide the procurement of renewable resources to fit with the customer's goals, load profile, and willingness to pay. While this DRER proposal is different from WEPCO's current renewable program offerings, it is similar to other utility programs, and in line with the industry trend of designing renewable programs to meet a growing demand for dedicated renewable resources that meet specific corporate sustainability goals.

WEPCO's Current Renewable Energy Programs

Both residential and non-residential customers of WEPCO may currently buy renewable energy through WEPCO's *Energy for Tomorrow* program. Participating customers pay an adder on top of their energy charge for the renewable energy, which varies by customer class and amount they wish to purchase. For example, participating residential customers pay an additional $0.00502 per kilowatt-hour (kWh) for 25 percent of their energy use, $0.01004 for 50 percent of their energy use, or $0.02007 for 100 percent of their energy use. The renewable energy is composed of WEPCO's current renewable energy portfolio, and includes wind, biomass, and a small amount of solar PV generation. This type of offering is generically referred to as a green pricing program, and almost all utilities in Wisconsin offer these programs to their customers.

Customers may also install their own generation systems, such as solar PV on top of their rooftops, interconnect with WEPCO's distribution system, and receive payment for their excess generation per WEPCO's Customer Generation Systems tariff. This tariff is similar to other Wisconsin utility tariffs, which may be called Parallel Generation buyback rates. However, these utility green pricing programs and customer-owned generation buyback rates do not always fit with the specific renewable energy goals of larger customers. WEPCO's DRER program is designed to be flexible and fit specific customer goals based on a negotiated contract within the structure outlined in this program.

DRER Program Design and Contract Structure

WEPCO's DRER program can be described as a "Virtual Purchase Power Agreement" (PPA), in which WEPCO, as a generator, contracts with its customer to negotiate a financial arrangement to pay for a specific resource without physically delivering the power to the customer. Any final DRER contract must be filed and approved by the Commission pursuant to Wis. Stat. § 196.192.

WEPCO would work with the customer to understand what type of renewable resource or resources fit within the customer's goals. Most likely the resource will be a solar PV system and/or wind resource, but could also include biomass or another type of renewable resource if the customer so desires. WEPCO proposes to limit the location of these dedicated resources to American Transmission Company LLC's transmission system within Wisconsin, or WEPCO's own distribution system, if the resource is small enough to be distribution interconnected. Within this initial pilot offering, WEPCO proposes to limit the total amount of resources it will dedicate to this program to be no more than 150 MW, per the cumulative nameplate capacity rating of the resources. If a customer's load is "new" to WEPCO's territory after the start of the program, the resources dedicated to the new load would not count towards this 150 MW program pilot limit.

The contract structure is designed to require the customer to pay for the entire capital, financial, and operations and maintenance costs of the resource as a separate bill item. The payments would be levelized over the course of the contract duration; i.e. 20 years. For tax purposes, non-profit and government customers will receive a per-kWh charge, and other customers will pay via a fixed monthly charge. Contract terms and conditions are outlined in the tariff proposal, and are designed to hold all other customers and shareholders indifferent to the transaction, and harmless in the case of customer default.

Besides the monthly contract payments, the participating customer will also receive credits on their bills that represent the market value of the designated resources. The transmission-interconnected resource will receive a MISO wholesale market generator pricing node. WEPCO will pass along the energy payments to the customer that were received in the MISO wholesale market, in terms of LMP, minus associated MISO administration costs.

WEPCO would also provide bill credits that represent capacity payments to the participating customer. MISO will accredit a MW capacity value for the resource, associated with expected summer on-peak production, and WEPCO will make capacity payments based on the $/MW monetary value described in the contract. Before the contract is signed, WEPCO will determine if the resource(s) will be defined as either a “long term planning resource” or a “short term planning resource.” If WEPCO has a capacity need[8] during the upcoming MISO planning period, the resource will be designated as a “long term planning resource” and receive capacity

[8] This capacity need analysis will be updated by WEPCO on an annual basis, and submitted to the Commission per WEPCO’s data request response (Data Request AK 1.3 PSC REF#: 354023).

payments based on the MISO-determined CONE.[9] If WEPCO does not have a capacity need, the resource will be initially designated as a "short term planning resource" and receive capacity payments based on the most recent results from MISO's annual capacity market known as the Planning Resource Auction (PRA). Additionally, any resource initially designated as "short term" would be put on a "long term capacity resource wait list" and its status could change if WEPCO has a capacity need in the future.

Besides the energy and capacity payments described above, the customer would also be entitled to the Renewable Energy Certificates (REC) produced by the facilities. Based on the customer's preference, the RECs would either be transferred to the customer's account or retired by WEPCO on the customer's behalf. This enables the customer to make the official claim that they are using the renewable energy from the designated resource(s).

In order to prevent the customer from oversizing the designated resource above the customer's energy needs, WEPCO's tariff proposal also caps the energy, capacity, and REC transfers based on the customer's load profile. For each hour of the billing period, the customer will only receive the portion of MISO LMP energy payments and associated RECs from the designated resource production that is equal to or lesser than the customer's electricity use over that hour. Likewise, the customer will only receive the monthly capacity portion from the designated resource's MW capacity value that is equal to or lesser than the customer's billed maximum demand for that month.

Analysis

[9] CONE represents the annualized costs including capital, O&M, taxes, and insurance for building a new 20-year capacity resource within the MISO territory.

MGE received approval[10] from the Commission for a renewable rider program that has many similarities to WEPCO's proposal. However, one of the primary differences is that the MGE program requires the participating customer to sign a contract and pay a negotiated premium for the dedicated renewable resources over the course of the contract. WEPCO's proposal requires that the participating customer pay the full cost of the designated resource over the course of the contract, while the customer also receives market payments partially offsetting the full cost of the resource. In other words, under the WEPCO proposal, the designated resource premium would be uncertain, and vary based upon the wholesale market performance of the dedicated resource in comparison to the levelized cost of the resource.

The LMP energy payments that the participating customer will receive from WEPCO over the course of the first year, as a pass-through revenue stream from the MISO wholesale market, will be a relatively predictable amount based on expected resource production and LMP prices observed near the proposed interconnection. However, over the course of a 20-year contract, LMP energy prices will fluctuate, and the participating customer must accept this uncertainty as a risk to the revenue the customer will receive for the dedicated resource's market performance. It is therefore incumbent upon a potential participant to perform a business-case analysis to understand the cost of the resource in comparison to revenue streams, and consider the likelihood of scenarios in which the customer would ultimately improve, lose, or break-even on the customer's investment at the end of the contract period. The assumption used for the highly uncertain rate of inflation for energy prices will be a key variable in this type of analysis.

Capacity revenue projections are also integral to a business-case analysis that a potential program participant must understand. The value of capacity is more subjective within the

[10] The Commission approved the MGE Renewable Energy Rider program by Order (PSC REF#: 327993) in docket 3270-TE-102 in July 2017.

electric industry, and WEPCO proposes capacity payments be based upon either CONE or PRA, which are bookend values. As mentioned in the Solar Now section of this memorandum, the most recent MISO-determined CONE result for LRZ 2 in planning year 2019-2020 was $87,170/MW-year. Across twelve equal monthly payments this would equate to $7,264.17/MW-month. The most recent MISO-operated capacity market result for LRZ 2 for planning year 2018-2019 was $10/MW-day.[11] In a normal 30-day billing period this would equate to $300/MW-month. Under these conditions, in a single month there would be almost $7,000 in billing credit difference between a participant with one MW of CONE-based capacity billing credit, and a participant with one MW of PRA-based capacity billing credit. Over the course of a year, this difference would be over $83,000, and over the course of a 20-year contract this difference would be over $1.6 million.

In short, there are significantly different drivers behind the monetary values of CONE and the PRA capacity auction results. CONE represents the capital costs of a generator that is primarily built to serve a summer capacity need, but which can also serve energy and reliability requirements throughout the year that a utility must plan for. PRA results are different because they are based on the supply and demand of a tradeable commodity in a voluntary market. The majority of market participants opt-out of the demand-side of the capacity market because they own their own generators and/or have bilateral contracts with generators or wholesale providers. Additionally, some market participants offer excess capacity on the supply-side of the MISO capacity market. Because the majority of MISO capacity market participants are vertically-integrated utilities that "self-serve" their own capacity needs, the MISO PRA capacity market

[11] MISO results for the 2018/2019 PRA are posted here: https://cdn.misoenergy.org/2018-19%20PRA%20Results173180.pdf.

results are much lower than CONE, as described above. It should also be noted that MISO uses CONE as a reference point for the maximum allowable cleared price for the PRA.

The Commission could find that a reasonable monetary value for capacity for these dedicated resources is somewhere between the bookend values of CONE and the PRA, and that the value need not be tied to the timing of WEPCO's capacity need position, which may change over time. Having a consistent capacity value would provide participating customers with more certainty, resulting in a more predictable net premium between the levelized resource payments and the wholesale market bill credits. A monetary capacity value between CONE and PRA that reflects the true cost that WEPCO would pay for incremental procurement of capacity may be most fair to non-participating customers, as the capacity payment that WEPCO will pay to the participating customer will come from the revenue requirement of all WEPCO customers.

The Commission agreed to a similar approach in its Final Decision in docket 5-AE-208 (PSC REF#: 303653) when it considered the opportunity sale of capacity credits from WEPCO to the affiliated-interest utility of Wisconsin Public Service Corporation. The Commission agreed that the WEPCO-proposed transaction price was reasonable, which was between a recent MISO PRA price and WEPCO's fully-allocated capacity cost. As was noted in the Commission Final Decision, this was the same approach used for a negotiated arm's length transaction between WEPCO and Wisconsin Power and Light Company. One way to achieve a similar result would be to take the average of the most recent MISO CONE and MISO PRA results as the capacity price paid to all DRER participating customers, regardless of WEPCO's need position. This would eliminate the need for WEPCO to annually analyze and update its position of capacity need, which would be market-sensitive information, and ensure equitable treatment among customers participating in the program. An alternative methodology could also be created to determine the appropriate monetary value of capacity between CONE and PRA prices for the purposes of the proposed DRER program. If the Commission allows WEPCO's proposal for capacity payments, the Commission may want to require annual reports for tracking CONE and PRA capacity payments made for this program.

DRER Program Commission Alternatives

Alternative One: Approve the proposed DRER program as filed.

Alternative Two: Approve the proposed DRER program with modifications or conditions.

Alternative Three: Deny the proposed DRER program.

AMK:jar:jlt:DL: 01654752

Key Background Documents
Final Decision signed and served 5-24-17 - PSC REF#: 303653Combined Pilot Program Application 101218 - PSC REF#: 351616
1-NAS-2 - PSC REF#: 352461
Notice of Investigation signed and served 11-1-18 - PSC REF#: 352570
CUB's Request to Intervene and Notice of Appearance - PSC REF#: 352753
RENEW Request - Full Party Status - PSC REF#: 353053
WIEG's Request to Intervene and Notice of Appearance - PSC REF#: 353386
Order on Requests to Intervene Served 11-27-18 - PSC REF#: 353837
David Weber Comment Letter - PSC REF#: 354261
Public comment opposing Solar Now tariff - PSC REF#: 354327
Public Comments regarding the Solar Now Tariff Proposal - PSC REF#: 354334
Public Comment by Mike Joyce - PSC REF#: 354348
1-CUB-RFP-1 CONFIDENTIAL - PSC REF#: 354803
1-CUB-RFP-1 CONFIDENTIAL (REDACTED COPY) - PSC REF#: 354804
Request to Intervene Out of Time and Notice of Appearance of the Environmental Law & Policy Center and Vote Solar - PSC REF#: 354922
Public Comment by Chuck Gates – PSC REF#: 354924
Final Decision signed and served 5-24-17 - PSC REF#: 303653