



State of Utah  
Department of Commerce  
Division of Public Utilities

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## MEMORANDUM

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Energy Section Manager

Date: May 15, 2013

Re: **Recommended Changes to Tariff Rule**

R746-405 Filing of Tariffs for Gas, Electric, Telephone, and Water Utilities

The Commission invited parties to comment on several proposed changes to its rule for filing tariffs: R746-405. The Division supports the proposed changes presented by the Commission to rule R746-405. The Division also believes that other changes to the rule should be considered to allow utilities to take advantage of newer technologies, thus, improving efficiencies for both the utilities and its customers, and regulators. The Division recommendations are as follows.

**R746-405.A.3:** Preliminary statement: a brief description . . . The preliminary statement shall clearly define the symbols used in the tariffs.

**Comments:** This method of filing tariffs with margin symbols indicating changes (C), deletions (D), significant increases (I), etc. seems particularly archaic—a throwback to pre-computer/word processing technology. The method is cumbersome, inefficient, and very difficult to work with.

**Recommendation:** Utilities should file redline and clean versions of tariffs any time a change is proposed.

**R746-405.4.B.1** Utilities shall constantly maintain their presently effective tariff at each business office open to the public.

**Comments:** Some utilities have closed some business offices. Some utilities already maintain current tariffs electronically, which are accessible by the public.

**Recommendation:** Allow utilities the option to maintain tariff books electronically and provide directions on how to find the current tariffs. For example, links on main web site, periodic directions included in bills, or other directions.

**R746-405.C.1** The loose-leaf sheets used in tariffs shall be of paper stock not less than 16 lb. bond or of equal durability and 8-1/2 x 11 inches in size. Tariffs may be printed, typewritten or mimeographed or other similar process. Tariffs may not be hand-written. One side of a sheet only may be used and a binding margin of at least 1-1/8 inches at the left of the sheet.

**Comments:** Update the requirements to allow for more current technology.

**Recommendation:** The loose-leaf sheets used in tariffs shall be of paper stock not less than 16 lb. bond or of equal durability and 8-1/2 x 11 inches in size. ~~Tariffs may be and electronically printed or copied, typewritten or mimeographed or other similar process.~~ Tariffs may not be hand-written. One side of a sheet only may be used and a binding margin of at least 1-1/8 inches at the left of the sheet.

**R746-405.D.6** If a change is proposed on a tariff sheet, attention shall be directed to the change by an appropriate character along the right-hand margin of the tariff sheet using the symbols set forth in the preliminary statement.

**Comments:** Modify this paragraph and adopt redline method previously indicated.

**Recommendation:** If a change is proposed on a tariff sheet, attention shall be directed to the change by ~~an appropriate character along the right-hand margin of the tariff sheet using the symbols set forth in the preliminary statement~~ a common electronic redlining or proofing method.

CC Dave Taylor, Rocky Mountain Power  
Barry Mckay, Questar Gas