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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: The Public Service Commission of Utah

From: The Office of Consumer Services

Michele Beck, Director

Béla Vastag, Utility Analyst

Date: September 22, 2014

Subject: Office of Consumer Services Request for Scheduling Conference. Docket No. 14-035-40, Rocky Mountain Power's Quarterly Compliance Filing – 2014.Q2 Avoided Cost Input Changes

Introduction

On August 22, 2014, Rocky Mountain Power (Company) made its quarterly avoided cost compliance filing with the Utah Public Service Commission (Commission). This filing reports changes to the avoided cost calculation since the Company's last quarterly compliance filing. On September 9, 2014, the Commission issued an Action Request to the Division of Public Utilities (Division) with a due date for making recommendations of September 22, 2014.

Request for Scheduling Conference

The Office of Consumer Services (Office) notes that the Company's compliance filing in this docket involves some of the same issues which have been litigated in the Schedule 37 proceeding in Docket No. 14-035-T04. The Commission has not yet issued an Order resolving those issues in that proceeding. In addition, the Company's filing in this docket also addresses a transmission constraint issue. The Office has opined in several proceedings¹ that the resolution of this transmission issue should be vetted with stakeholders before it is implemented by the Company in QF avoided cost methods. Therefore, it is also the Office's view in this proceeding that the Commission should not rule on the Company's method for addressing the transmission constraint until other parties have had adequate time to evaluate and comment on the method.

Due to these issues and possibly other issues to be identified by interested parties, the Office asserts that this quarterly avoided cost compliance filing requires a greater level of analysis and evaluation than the typical quarterly filing receives. Thus, the Office requests that the Commission hold a scheduling conference to determine dates by which parties can

¹ Docket Nos. 14-035-T04, 14-035-85, 14-035-86, 14-035-87 and 14-035-88.

file comments and/or testimony in this proceeding so that a complete record can be developed prior to any Commission order.

CC: Chris Parker, Division of Public Utilities
Jeffrey K. Larsen, Rocky Mountain Power