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April 25, 2014

**VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY**

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

**Re: Advice No. 14-02
Schedule 32, Service From Renewable Energy Facilities**

Enclosed for filing are an original and five copies of proposed tariff sheets associated with Tariff P.S.C.U No. 49 of PacifiCorp, d.b.a. Rocky Mountain Power, applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405D, Rocky Mountain Power (the "Company") states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Company will also provide an electronic version of this filing and the accompanying workpapers to psc@utah.gov. The Company respectfully requests an effective date of June 1, 2014 for the new tariff. The Company also requests that the Commission schedule a technical conference on this matter in the near future.

First Revision of Sheet No. B		Electric Service Schedules Index
Original Sheet No. 32.1	Schedule 32	Service from Renewable Energy Facilities
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Through this filing the Company is requesting approval of Electric Service Schedule No. 32, Service From Renewable Energy Facilities, which allows a customer to receive electricity directly from a renewable energy facility as provided in Utah Code Title 54, Chapter 17, Part 8, Renewable Energy Contracts. The proposed Schedule 32 governs the conditions of service, pricing, and the contracting and interconnection procedures under which Rocky Mountain Power

(RMP) will enter into a contract to supply electric service to a customer from one or more renewable energy facilities which are owned or contractually tied to that customer.

Background

During the 2012 Utah legislative session Senate Bill 12 (SB12) was passed unanimously by both houses and signed into law. This bill, found in Utah Code Title 54, Chapter 17, Part 8, “Renewable Energy Contracts”, allows a customer to receive electricity directly from a renewable energy facility if the customer pays all the costs associated with renewable energy. The customer’s electric service requirements beyond those provided by the renewable energy facility will be provided at standard utility tariff rates.

Since SB12 became law the company has received inquiries from numerous customers, cities, and renewable energy developers expressing interest in providing and receiving renewable energy service under the law. To provide guidance to potential customers and to avoid the need to negotiate the rates and terms of service individually with each customer, the company has developed the attached Electric Service Schedule No. 32, Service From Renewable Energy Facilities, that would apply to all customers taking service under the provision of SB12.

Overview of SB12 Service

Under the provisions of SB12, a customer that desires to have a larger portion of its electric service provided by renewable energy sources than is currently included in the company’s resource portfolio may contract to receive renewable power and energy directly from a renewable energy facility. The customer is responsible to pay all of the costs and bear all of the risk of renewable energy facility which may be owned and operated by either the customer or a third party. The renewable energy facility is responsible for all interconnection and integration costs.

To avoid concerns about retail wheeling and to meet the requirements of network transmission service, this service is facilitated by two matching contracts. The company will contract with the owner of the renewable energy facility to purchase electricity for resale to the customer (or in some cases more than one customer). The company will then sell that electricity to the customer or customers under renewable energy contracts with the same duration and pricing as the contract between the company and the owner of the renewable energy facility. To protect other retail customers, the company’s contract with renewable energy facility will terminate if the ultimate customer defaults in its obligation to purchase and pay for the electricity under its contract with the company.

The company will deliver the electricity from the renewable energy facility across the company’s transmission and distribution facilities to the customer. Because the company takes ownership of the electricity through its purchase from the renewable energy facility the delivery of electricity to the customer is included as part of the company’s network transmission service.

The company will also provide the customer with backup service during periods when the renewable energy facility is not producing electricity. In addition, the company provides supplementary service at standard general service rates for the electric service regularly used by the customer in addition to the capacity of the renewable energy facility. Supplementary and backup service is provided from the Company's resource portfolio and is not 100% renewable energy.

SB12 service also specifically does not allow net metering. Excess generation in one 15 minute period cannot be used to offset under generation in another 15 minute period. During each 15 minute period the electricity delivered from the renewable energy facility is netted against the electricity delivered to the customer. During each 15 minute period the metered electric service delivered to the customer is segregated into renewable power and energy, backup service, and supplementary service.

While SB12 type service allows a single customer to take service from more than one renewable energy facility and for more than one customer to take service from a single renewable energy facility, it requires that a specified percentage of each renewable energy facility to be assigned to each customer. It does not allow a renewable energy facility to serve the undivided aggregate load of multiple customers or to multiple delivery points of a single customer. In other words, the generation capacity used to serve one customer cannot be reassigned to serve another customer or another delivery point during periods of load fluctuations among the customers or delivery points.

Overview of Tariff

Schedule 32 includes the conditions that a customer must meet to be eligible for SB12 type service. It also includes the procedures for entering into a renewable energy contract and the interconnection obligations of the renewable energy facility. Schedule 32 also provides the prices for the five types of service provided under Schedule 32 and details how the power and energy delivered to the customer is segregated into these services. These are:

1. Renewable Power and Energy –Renewable power and energy will be provided according to the terms of the Renewable Energy Contract. The renewable energy contract will include all of the costs of electricity provided from the renewable energy facility and will match all prices, terms, and conditions of the contract between the company and the renewable energy facility.
2. Metering and Billing Services – The monthly Customer Charge is equal to the Customer Charge in Schedule 31 (Backup Service) and is billed for each Customer Agreement. In addition to the monthly Customer Charge there is a \$450 per month Administrative Fee per Customer Agreement to cover the cost of manual data collection and billing. The Administrative Fee reflects the complexities for billing this type of account which requires matching the generation output of the Renewable Generation Facility with the metered usage of the customers during each 15 minute period and segregating the delivered service into renewable power and energy, backup service, and supplementary service. Using an excel spreadsheet format for a single customer agreement is estimated to be six to eight hours per agreement per month at the current billing rate of \$75.00 per hour.

3. Delivery Service – The Delivery Facilities Charge is a monthly per kW facilities charge for either electricity delivered by the company from the renewable energy facility or backup service electricity delivered from the company’s generation facilities. The delivery facilities charge includes the full retail cost of the company’s transmission system, including wheeling costs, and distribution system when applicable.
4. Backup Service – Backup Service is comprised of two components. First, the Generation Backup Facilities Charge is a monthly per kW charge to have generation facilities standing by to serve the customer during periods when the renewable energy facility is not producing electricity. The monthly generation facilities charge includes the cost of generation planning reserves (13% of generation demand costs). Second, the Backup Power Charge is a daily demand charge per kW to replace electric service ordinarily generated by the renewable energy facility during forced or maintenance outages of the facility. The daily demand charge includes the remaining generation demand related costs included in the applicable general service tariff power charges. Backup Service is provided from the Company’s resource portfolio and is not 100% renewable energy.
5. Supplementary Service - Electric service regularly used by a customer in addition to the capacity of the renewable energy facility. Supplementary power and all energy not supplied by the renewable energy facility are billed under the pricing provisions of the applicable general service schedule. Supplementary Service is provided from the Company’s resource portfolio and is not 100% renewable energy.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
 dave.taylor@pacificorp.com

By regular mail: Data Request Response Center
 PacifiCorp
 825 NE Multnomah, Suite 2000
 Portland, OR 97232

Informal inquiries may be directed to Dave Taylor at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation and Government Affairs

cc: Division of Public Utilities
 Office of Consumer Services

Enclosures