- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

In the Matter of the Application of Rocky Mountain Power to Implement Programs Authorized by the Sustainable Transportation and Energy Plan Act	DOCKET NO. 16-035-36 PHASE ONE REPORT AND ORDER

ISSUED: December 29, 2016

SYNOPSIS

The PSC approves those components of PacifiCorp's Application, as amended by Supplemental Direct Testimony and Rebuttal Testimony, that the PSC designated for adjudication in Phase One of this docket. The PSC directs PacifiCorp to include all related operations, maintenance, administrative, and general costs in the respective STEP Program budgets.

I. BACKGROUND AND PROCEDURAL HISTORY

This docket arises out of the Application to Implement Programs Authorized by the Sustainable Transportation and Energy Plan Act ("Application") that PacifiCorp dba Rocky Mountain Power ("PacifiCorp") filed with the Public Service Commission ("PSC") on September 12, 2016.

a. The Sustainable Transportation and Energy Plan Act

In March 2016, the Legislature enacted and the Governor signed into law the Sustainable Transportation and Energy Plan Act (the "Act"), now codified, among other places, at Utah Code Ann. §§ 54-7-12.8, 54-20-101, *et seq.* The Act made significant revisions to Title 54 of the Utah Code. Here, we discuss only the changes pertinent to this Report and Order.

As the title suggests, the Act allows PacifiCorp to implement a "sustainable transportation and energy plan," which the Act defines as "the programs approved by the [PSC under the Act] and undertaken by [PacifiCorp]" during a statutory five year "pilot program period." Utah Code Ann. § 54-20-102. This Report and Order collectively refers to these programs, *i.e.*, those programs identified at Utah Code Ann. § 54-20-102(3), as "STEP." The Act requires the PSC to authorize, before July 1, 2017, (a) the electric vehicle incentive program described in § 54-20-103; and (b) the clean coal technology program described in § 54-20-104. Additionally, the Act contemplates the PSC may authorize the following "innovative technology programs" as enumerated in § 54-20-105:

- an economic development incentive rate;
- a solar generation incentive;
- a battery storage or electric grid related project;
- a commercial line extension pilot program;
- a program to curtail emissions from a thermal generation plant in the Salt Lake non-attainment area during an air quality non-attainment event;
- an additional electric vehicle incentive program;
- an additional clean coal program; and
- any other technology program.

Expenditures under STEP are subject to PSC review to ensure they are prudent and accord with the purposes of the program. *Id.* at §§ 54-20-103(2), 54-20-104(2), § 54-20-105(2).[1] The Act also terminates the Utah Solar Incentive Program ("USIP"), effective December 31, 2016. *Id.* at § 54-7-12.8(4).

[1] The Act establishes a ceiling for expenditures on particular programs. *See, e.g.*, Utah Code Ann. § 54-7-12.8(6)(b) (establishing a $2,000,000 annual ceiling for expenditures on an electric vehicle incentive program).

To fund STEP, the Act authorizes PacifiCorp to allocate $10,000,000 annually ("STEP Funds"), during the pilot period. *Id.* at § 54-7-12.8(6). Specifically, the Act requires the PSC to authorize PacifiCorp to implement a combined line item charge to recover the costs of STEP, demand side management ("DSM"), and certain other identified expenses. *Id.* at § 54-7-12.8. STEP Funds not allocated to STEP may be allocated to DSM. *Id.* Under the Act, PacifiCorp must establish a balancing account ("STEP Balancing Account") to hold and track the STEP Funds, STEP expenditures, unrecovered USIP costs, and a carrying charge (in an amount the PSC determines). *Id.* at § 54-7-12.8(7).

Finally, the Act allows PacifiCorp to capitalize the annual costs incurred for DSM, to amortize such costs over a period of 10 years and to apply a carrying charge to the unamortized balance as specified in the statute. *Id.* at § 54-7-12.8(2)(b). PacifiCorp may recognize "the difference between the annual revenues [PacifiCorp] collects for [DSM] and the annual amount of [PacifiCorp's DSM] cost amortization expense as an additional expense." *Id.* at § 54-7-12.8(5)(a). The Act further allows PacifiCorp to "establish and fund, via [this] additional expense … a regulatory liability" and use this regulatory liability "to depreciate thermal generation plant." *Id.* "The [PSC] may authorize [PacifiCorp] to use the regulatory liability … to depreciate thermal generation plant for which the [PSC] determines depreciation is in the public interest for compliance with an environmental regulation or another purpose." *Id.* at § 54-7-12.8(5)(b).

b. The Application

In general, PacifiCorp's Application seeks authorization to implement numerous provisions of the Act and to revise its tariff accordingly. In brief, the Application seeks authorization to implement the following programs and tariff changes:

(1) Beginning January 1, 2017, Schedule 196 rates, which will be designed to collect $10 million per year, will be combined on customer bills with Schedule 193 rates that recover the cost of DSM, including the cost of amortizing a deferred DSM balance, in a combined line item charge;[2]

(2) establish and fund a regulatory liability, via a component of the line item charge described in item (1) above, and use the regulatory liability to depreciate thermal generation plant with an associated carrying charge equal to the utility's pretax weighted average cost of capital;

(3) implement an Electric Vehicle Incentive Pilot Program pursuant to the Act;

(4) establish a Clean Coal Technology Program ("CCT Program") under the Act;

(5) implement two "innovative utility program" projects under Utah Code Ann. § 54-20-105 for (i) an advanced substation metering project; and (ii) a solar and energy storage technology project;

(6) establish a program to curtail emissions from the Gadsby thermal generation plant ("Gadsby Curtailment") during a non-attainment event as defined by the Division of Air Quality, pursuant to Utah Code Ann. § 54-20-105(1)(e);

(7) implement a new commercial line extension pilot program under Utah Code Ann. § 54-20-105(1)(d) through new tariff Electric Service Regulation No. 13; and

[2] PacifiCorp initially proposed to collect STEP Funds through Schedule 195 and to rename the Schedule from "Solar Incentive Program Cost Adjustment" to "Sustainable Transportation and Energy Plan (STEP) Cost Adjustment." With its rebuttal testimony, PacifiCorp submitted new tariff sheets proposing to cancel Schedule 195 and introduce Schedule 196, which is titled "Sustainable Transportation and Energy Plan (STEP) Cost Adjustment Pilot Program."

(8) modify the USIP through revisions to tariff Schedule No. 107 as of December 31, 2016, pursuant to the Act, to stop accepting new applications for incentives with forecast unrecovered USIP costs included in the proposed Schedule 196 rates.

(Application at 2-3.)

PacifiCorp's Application proposes a five-year, $50 million STEP budget with annual spending amounts between $8.2 and $11.8 million for implementation of STEP programs.[3] PacifiCorp also proposes a carrying charge for the STEP Balancing Account that matches the carrying charge the PSC established in Docket No. 15-035-69.[4]

PacifiCorp modified its initial Application through supplemental written direct testimony and written rebuttal testimony, largely in response to input it received from other parties through direct written testimony. These revisions included revised proposed tariff sheets. (*See, e.g.,* S. McDougal Rebuttal Test. and attachments, filed Nov. 23, 2016.) Hereafter, the "Application" refers to PacifiCorp's final Application as amended through all supplemental and rebuttal testimony, including the revised tariff sheets.

In its rebuttal testimony, PacifiCorp also committed to providing annual reports for the total STEP and individual STEP programs, addressing project costs (annual collection, annual spending, committed funds, uncommitted funds, and external OMAG expenses) and individual project/program status updates (program objectives, accounting issues, milestones, key findings, program benefits, and results/assessment for future applications). (S. McDougal Rebuttal Test. at

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[3] *See* Application, at 4, Table 1. According to PacifiCorp, $12.9 million of the $50 million budget amount has not yet been assigned to a specific project request. PacifiCorp states that it will file additional information when beneficial projects are identified, including a residential time of use pilot project. *See* Application at 34.

[4] *In the Matter of a Request for Agency Action to Review the Carrying Charges Applied to Various Rocky Mountain Power Account Balances,* Docket No. 15-035-69, Order dated January 20, 2016.

13:263-15:304.) PacifiCorp further committed to filing, concurrent with the filing of its annual results of operations report, an annual report on the STEP balances for the prior year. In addition, PacifiCorp committed to file annual status updates on its nitrogen oxide ("NOx") reduction clean coal projects to include project performance information such as changes to NOx emissions and heat rates and proposals and reports PacifiCorp received or produced relating to NOx projects since the previous report. (*Id.*) PacifiCorp represented it would provide a final comprehensive program evaluation report on the status and results of all STEP projects at the conclusion of the pilot period. (*Id.*)

c. Procedural History and Bifurcation of the Docket

PacifiCorp filed its Application on September 12, 2016, and the PSC held a scheduling conference on September 21, 2016 to establish an adjudication schedule. Because the Application involves numerous issues for which the Legislature has imposed different statutory deadlines for the PSC to act, the parties agreed to bifurcate the Application's adjudication into at least two phases. [5] This Report and Order addresses those issues the parties agreed would be adjudicated in Phase One.[6] The PSC enumerated those issues in the Phase One Scheduling Order it issued on September 26, 2016, as follows:

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[5] As detailed in the PSC's October 21, 2016 Phase Two Scheduling Order, Notice of Phase Two Technical Conferences and Notice of Phase Two Hearing, the PSC will consider all remaining relief PacifiCorp seeks in its Application during Phase Two.

[6] For example, the combined line item charge and changes to USIP under Utah Code Ann. § 54-7-12.8 must be authorized before January 1, 2017 whereas the STEP programs contemplated in Utah Code Ann. § 54-20-101, *et seq.* are either subject to no statutory deadline (*i.e.*, innovative technology programs) or a June 30, 2017 deadline (*i.e.*, the CCT and Electric Vehicle Incentive Pilot Program).

(1) The proposed line-item charge authorized by U.C.A. § 54-7-12.8(3) and attendant tariff and accounting issues.[7] This category includes consideration of the STEP budget, the combined line item charge for DSM and STEP, DSM cost capitalization, changes to the USIP, PacifiCorp's requested carrying charge associated with the unamortized balance in the DSM account, and PacifiCorp's request to establish and fund a regulatory liability for thermal plant depreciation.

(2) The proposed Gadsby Curtailment program.[8]

(3) The proposed solar and energy storage technology program ("Solar and Energy Storage Program").[9]

(4) A portion of the proposed CCT Program; specifically, the two NOx emissions control projects, *i.e.*, a neural network controls demonstration project and a utility scale demonstration project.[10]

The PSC granted the following parties' intervention requests during Phase One: Sierra Club; Utah Clean Energy ("UCE"), and Western Resource Advocates ("WRA"). On November 30, 2016, the PSC conducted a hearing on Phase One. Witnesses for PacifiCorp, the Division of Public Utilities ("DPU"), the Office of Consumer Services ("OCS"), UCE, and WRA provided sworn testimony during the hearing.

The written testimony the parties submitted and the testimony they offered at hearing demonstrated they had reached consensus on numerous Phase One issues, either because no

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[7] *See* Application, at 6-8, ¶¶ 5-7 and 10-11.

[8] *See* Application, at 26-28, ¶¶ 53-57.

[9] *See* Application, at 24-26, ¶¶ 47-51.

[10] *See* Application, at 19-20, ¶¶ 36-38.

party disputed the relief PacifiCorp initially sought or because PacifiCorp had remedied any concerns the parties had through its supplemental testimony and revised proposed tariff sheets.

d. Phase One Issues Lacking Consensus among the Parties

The parties generally agree as to the appropriate outcome with respect to all Phase One Issues with the following exceptions:

i. Gadsby Curtailment – Price of Replacement Power

With respect to the Gadsby Curtailment, PacifiCorp proposed a program that would:

> [E]stablish a process where the Gadsby Power Plant would curtail its emissions during winter inversion air quality events as defined by the Utah Division of Air Quality ("UDAQ"). Funds collected under 54-20-105-1 [*sic*] will be used to cover costs of the curtailment during the 5 year pilot program period. The curtailment program is budgeted for a total $500,000. Once the funds are exhausted the program will cease to operate.

(Application, Ex. E at 2.) PacifiCorp maintains the Gadsby Curtailment program is consistent with STEP and is in customers' interest as it "may reduce emissions in the Salt Lake non-attainment area (where customers reside) and assist the state in complying with federal National Ambient Air Quality Standards." (J. Campbell Direct Test. at 3:56-62.)

The DPU supports the Gadsby Curtailment, noting the potential improvement of air quality as a significant benefit. (R. Davis Direct Test. at 17:303-305.) Both the DPU and the OCS agree that PacifiCorp's proposed method for calculating the curtailment costs is acceptable. The OCS, however, disagrees with PacifiCorp's proposal to use the Four Corners trading hub prices as a proxy for the cost of replacement power in the event of a curtailment. (Hr'g Tr. at 74:6-18.) The OCS emphasizes that PacifiCorp did not indicate in its Application the reason for using the Four Corners hub as opposed to using actual costs or other possible trading hubs. (*Id.*)

PacifiCorp testified at hearing that calculating the actual replacement cost would be very difficult because there are many variables regarding transmission constraints and system characteristics that influence where and how PacifiCorp might purchase replacement power. (S. McDougal Rebuttal Test. at 8:167-169.) PacifiCorp further testified that it chose the Four Corners hub because of its geographic proximity. (Hr'g Tr. at 95:4-5.) PacifiCorp emphasized that it required a defined method for calculating replacement power. (Hr'g Tr. at 28:21-29:1.) PacifiCorp testified that, absent approval of using a market proxy, it would not likely proceed with implementation of the Gadsby Curtailment program as it could not reasonably accept the risk of replacement power cost recovery. (*Id.*)

ii. Operation, Maintenance, Administrative and Other Costs

In written testimony, the DPU and the OCS raised concerns about the proper treatment of STEP related operation, maintenance, administrative and other costs ("OMAG costs"), especially with respect to PacifiCorp's CCT Program. At hearing, the DPU and the OCS clarified that their concerns about OMAG costs applied to all STEP proposals (*See, e.g.,* Hr'g Tr. at 61:3-8.)

The OCS asserts OMAG costs need to be identified, quantified and included in PacifiCorp's STEP budget. (*Id.* at 73:22-25.) Further, the OCS contends that "the Company should reserve STEP funds from funds authorized by the Legislature to be used for OMAG expenses rather than seek recovery outside of the STEP line item charge for the years during which STEP is in place." (*Id.* at 73:25-74:5.) The DPU agrees with the OCS' recommendation and testified that STEP related "OMAG expenses should be identified during the STEP pilot program and included in STEP funding." (*Id.* at 57:8-10.) Although PacifiCorp expressed its willingness to report only "external OMAG expenses" in its written rebuttal testimony, PacifiCorp did not present a witness supportive of the OCS' and the Division's recommendation. (*See* S. McDougal Rebuttal Test. at 14:273.)

iii. Allocation of Benefits Flowing from the Solar and Energy Storage Program

PacifiCorp requests the PSC:

> authorize $5 million to install energy storage technology to resolve voltage issues on the [] transmission line. An additional $2 million from Blue Sky community project funds will be utilized to install a large-scale, company-owned solar project. [The] [relevant] substation is fed radially [] and all capacitive voltage correction factors have been exhausted. The storage technology will be installed on the [pertinent] distribution system and will defer or eliminate the need for traditional capital investments in the form of upgraded poles, wires and/or substations estimated at $8-14 million.

(Application, Ex. D at 1 (redacted portions confidential in original).) In written testimony, the DPU expressed concern that Utah customers alone would bear the costs associated with the Solar and Energy Storage Program while the benefits would flow to all of PacifiCorp's customers, including those in other states. (R. Davis Direct Test. at 11:194-199.) The system would benefit because, under the existing interjurisdictional allocation method, PacifiCorp allocates costs associated with transmission projects to the system, and the Solar and Energy Storage Program will allow PacifiCorp to forego otherwise necessary transmission upgrades. (*Id.*) The DPU recommends, at a minimum, Utah customers retain the direct cost savings of the project and that the benefits flow through PacifiCorp's energy balancing account ("EBA") at the market value of the output. (R. Davis Rebuttal Test. at 2:29-32.)

The OCS echoes the DPU's concerns and opposes the PSC's approval of the Solar and Energy Storage Program. (*See generally* Hr'g Tr. at 80:18-82:21.) The OCS argues the cost allocation issues associated with employing a "distribution side" solution to solve a "transmission side" problem render jurisdictions unlikely to approve similar programs in the future. (*See id.* at 81:14-82:17.) Alternatively, if the PSC approves the Solar and Energy Storage Program, the OCS supports the DPU's recommendation that the benefit of the energy from the solar facility should be credited back to Utah through the EBA. (*Id.* at 82:25-83:5.)

UCE supports PacifiCorp's Solar and Energy Storage Program, but UCE recommends PacifiCorp allocate the value of the energy the solar component generates to community service organizations through a grant program. (S. Wright Direct Test. at 8:165-9:173.) UCE argues this is appropriate because PacifiCorp plans to use Blue Sky funds to pay for the solar portion of the project. (*Id.* at 8:145-158.) While generally supportive of UCE's grant proposal, both the DPU and the OCS have reservations regarding the potential administrative costs and the method for valuing the generation. (*See, e.g.*, R. Davis Rebuttal Test. at 3:48-53; B. Vastag Rebuttal Test. at 2:29-41.)

In rebuttal testimony, PacifiCorp agreed with the DPU that the benefits of the Solar and Energy Storage Program should flow to Utah customers through the EBA. (*See, e.g.*, S. McDougal Rebuttal Test. at 5:100-102; Hr'g Tr. at 35:13-15.) PacifiCorp opposes UCE's grant proposal, arguing all the excess energy will be consumed locally and the cost savings will and should benefit all Utah customers (through the EBA). (Hr'g Tr.at 38:17-24.)

II. DISCUSSION, FINDINGS AND CONCLUSIONS

We understand no dispute exists and all parties support the relief PacifiCorp seeks in Phase One as to the following: (i) the STEP budget; (ii) the combined line item charge for STEP, DSM and other costs as the Act contemplates; (iii) the STEP Balancing Account and associated carrying charge, to be reset annually, as ordered in Docket No. 15-035-69; [11] (iv) DSM cost capitalization; (v) establishment and funding of a regulatory liability for thermal plant depreciation as prescribed in Utah Code Ann. § 54-7-12.8 and associated carrying charge equal to the utility's pretax weighted average cost of capital; (vi) the two NOx emission control projects that comprise the portion of the CCT Program being adjudicated in Phase One; (vii) the statutorily mandated changes to USIP; and (viii) all proposed tariff revisions to implement these changes and programs.

As to these issues about which the parties have reached consensus, we agree PacifiCorp's proposals are consistent with the Act. In light of the Act's statutory mandates, we find these proposals to be just, reasonable and in the public interest.

We address briefly below those issues about which the parties did not reach consensus.

a. OMAG Expenses

We find value in requiring PacifiCorp to track and report the OMAG expenses associated with STEP projects. The DPU and the OCS have persuaded us that STEP-project related OMAG expenses should be included in the STEP budget as they are integral to the execution of the programs. Accordingly, we order PacifiCorp to book all STEP-related expenses to the STEP budget and to maintain records that will allow STEP and non-STEP OMAG costs to be properly accounted for during the next general rate case.

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[11] *In the Matter of a Request for Agency Action to Review the Carrying Charges Applied to Various Rocky Mountain Power Account Balances*, Docket No. 15-035-69, Order dated January 20, 2016.

b. Gadsby Curtailment

We note the DPU and the OCS agree that PacifiCorp's proposed method for calculating the curtailment costs is acceptable. To the extent a dispute exits, it concerns whether the Four Corners hub is an appropriate proxy.

PacifiCorp testified that actual replacement costs are not precisely knowable because of the constraints and characteristics of the system and explained the Four Corners hub most closely resembles market prices in Utah. Further, PacifiCorp testified that determining the actual cost of real-time curtailment is potentially controversial, since such a determination would require a counterfactual comparison for the real-time duration of the curtailment. Finally, PacifiCorp argued that a market proxy approach provides an independent and verifiable fair value of the energy, and is consistent with the approach PacifiCorp recommends using to value Utah's benefit under the Solar and Energy Storage Program. We find these arguments persuasive and are mindful that PacifiCorp seeks an approved method to avoid conflict within the annual EBA dockets. Therefore, we conclude the Four Corners hub is an acceptable proxy. Additionally, based on the testimony of PacifiCorp and the DPU relating to the program's benefits, we find the Gadsby Curtailment is in the interest of PacifiCorp's customers and is otherwise just, reasonable and in the public interest.

c. Solar and Energy Storage Program

We understand that UCE's grant proposal is well intentioned, but it undeniably lacks definition. Significant uncertainty exists regarding administrative costs and selection criteria. Additionally, contrary to UCE's argument, the Blue Sky program was not designed or intended to provide subsidies to community service organizations. Rather, it was designed "to encourage further development of Renewable Energy resources in the Western region."[12] PacifiCorp's proposal results in the construction of a commercial scale renewable energy project, and it is compatible with the objectives of the Blue Sky program.[13] We also note that while the proportion of the initial costs paid for with Blue Sky funds is 28.5 percent of the total program cost, the proportion of ongoing costs paid for with Blue Sky funds will be zero. We conclude the increase in permanent renewable generating resources is a sufficient justification for using the available Blue Sky funds. Accordingly, we decline to adopt UCE's grant proposal.

The Solar and Energy Storage Program will facilitate the creation of new solar generation within PacifiCorp's Utah operating footprint, and we find the program is of the type the Act authorizes PacifiCorp to implement. The project PacifiCorp proposes should provide valuable experience for PacifiCorp with respect to integrating and optimizing renewable resources, as well as in facilitating storage. Because PacifiCorp has agreed to flow the benefits of the resulting generation through the EBA to Utah customers and to use the same accounting/decision-making treatment when evaluating future projects, regardless of resource type or location, we find PacifiCorp's proposed Solar and Energy Storage Program to be just, reasonable and in the public interest.

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[12] PacifiCorp's Electric Service Schedule No. 70, Renewable Energy Rider – Optional, Sheet No. 1, Purpose.

[13] The Blue Sky program objectives, as advertised to potential and actual participants, are: (1) Influence the future of energy production; (2) Encourage the development of new renewable energy in our region, which benefits local economies; (3) Preserve the environment and conserve resources for future generations. (Rocky Mountain Power Blue Sky Program Overview, *available at* https://www.rockymountainpower.net/env/bsre/po.html.)

V. ORDER

1. We approve PacifiCorp's STEP funding budget of $50 million from 2017 through 2021, representing an annual revenue increase of $10 million per year, and PacifiCorp's establishing the STEP Balancing Account with an associated carrying charge, reset annually and based on the method determined in Docket No. 15-035-69, as outlined in this Report and Order.
2. We approve PacifiCorp's proposed revisions to Schedule Nos. 107, 193, 195, 196, and related Index sheets, effective January 1, 2017, including the surcharge rates, and the discontinuance of the USIP pilot program as outlined in testimony.
3. We approve the creation of a regulatory liability for the purpose of depreciating thermal generation plant with an associated carrying charge equal to the utility's pretax weighted average cost of capital.
4. We approve the NOx portions of the CCT Program as outlined in the Application, the Phase One Scheduling Order and this Report and Order.
5. We approve the Solar and Energy Storage Program as outlined in the Application and as modified through rebuttal testimony and this Report and Order; our approval is expressly conditioned on Utah customers being credited for the program's generation through the EBA.
6. We approve the Gadsby Curtailment program as outlined in the Application, using the Four Corners hub as the designated proxy price.

7. We direct PacifiCorp to include all program-related OMAG expenses in the STEP budgets.

DATED at Salt Lake City, Utah, December 29, 2016.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/Jordan A. White, Commissioner

Attest:

/s/ Gary L. Widerburg
Commission Secretary
DW#290994

Notice of Opportunity for Agency Review or Rehearing

Pursuant to §§ 63G-4-301 and 54-7-15 of the Utah Code, an aggrieved party may request agency review or rehearing of this Order by filing a written request with the Commission within 30 days after the issuance of this Order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the Commission does not grant a request for review or rehearing within 20 days after the filing of the request, it is deemed denied. Judicial review of the Commission's final agency action may be obtained by filing a petition for review with the Utah Supreme Court within 30 days after final agency action. Any petition for review must comply with the requirements of §§ 63G-4-401 and 63G-4-403 of the Utah Code and Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on December 29, 2016, a true and correct copy of the foregoing was served upon the following as indicated below:

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