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State of Utah

Department of Commerce Division of Public Utilities

CHRIS PARKER ARTIE POWELL
Executive Director *Director, Division of Public Utilities*

Action Request Response

To: Utah Public Service Commission
From: Utah Division of Public Utilities
Artie Powell, Director
Doug Wheelwright, Utility Technical Consultant Supervisor
Eric Orton, Utility Technical Consultant
Date: November 30, 2020
Re: **Docket No. 17-030-T01**, In the Matter of Moon Lake Electric Association, Inc.'s Proposed Tariff Revisions.

Recommendation (Approve)

The Division of Public Utilities (Division) recommends that the Public Service Commission of Utah (Commission) approve the request to allow Moon Lake Electric Association, Inc. (Moon Lake) to include the interpretation of its Electric Service Regulation #17 tariff as an addendum rather than require a full filing.

Issue

According Moon Lake Electric it updated its Electric Service Regulation #17 effective July 1, 2019. As part of that filing a “table was developed to help illustrate the charges associated with implementing the System Capacity Charge on an installed KVA basis.”

Following that process Moon Lake “determined that the use of KVA as a reference for determining the charge is mathematically appropriate, however our consumers struggle with the KVA concept.” Therefore they “have put together another illustration that references the charges based on the size of service that is requested by the consumer.” The new illustration provides a

chart that shows the service in amps rather than KVA's "based on our typical transformer sizing methodology."

Moon Lake wants a Commission determination as to the appropriateness of using this interpretation chart in its tariff based on the premise that it is informational only and not "materially changing the costs". The other option offered by Moon Lake is to make what it calls "a full filing". Specifically it is requesting permission to "file the interpretation as an addendum to the Electric Service Regulation #17 to help clarify and better implement the structure for our consumers".

Background

On November 10, 2020 Mr. Corum, the Moon Lake Managing Engineer, emailed the above referenced question to the Commission. On November 13, 2020, the Commission issued its Action Request to the Division directing it to investigate the matter.

As part of its investigation the Division notes that the July 20, 2017 correspondence from Gary Widerberg noted several inadequacies in Moon Lake's filing, in part regarding this Electric Service Regulation #17. The correspondence from the Commission concluded by stating: "Based on the PSC's review of the filing and the DPU's comments, the PSC determines it cannot acknowledge Moon Lake's tariff changes until the relevant requirements of the Utah Code have been satisfied or Moon Lake provides supplemental clarifying information, including the changes to Schedule NM-3 and Regulation 17 as described above." Therefore, Regulation 17 has not been acknowledged by the Commission to date.

Discussion

The Division reviewed Mr. Corum's email as well as its accompanying snapshot of the interpretation table in addition to the attachment and the Electric Service Regulation #17 tariff, which is Moon Lake's Line Extension Policy.

The Division concludes that similar tables are already included in its Electric Service Regulation #17 tariff and that including the one Mr. Corum provided "a snapshot of" will be in line with

past practice and should be allowed. Charts, graphs, matrix and tables that are included in tariffs are designed to make the tariff easier to understand to utility customers and are appropriate.

Additionally, Mr. Corum stated that this proposal is not “materially changing the costs”.

Conclusion

The Division recommends that the Commission approve the request to allow Moon Lake to include a table materially the same as the one provided in the snapshot. The Division reviewed the information provided and recommends the Commission approve the request as presented while still not acknowledging the tariff itself. The Company will need to provide a copy of the revised tariff and is encouraged to submit additional corrections to the Commission for review and approval.

Cc: Patrick Corum, Moon Lake Electric Association Inc.
Michele Beck, Office of Consumer Services