

J. Craig Smith #4143
(jcsmith@shutah.law)
Adam S. Long #14701
(along@shutah.law)
SMITH HARTVIGSEN, PLLC
257 East 200 South, Suite 500
Salt Lake City, Utah 84111
Telephone: (801) 413-1600
Facsimile: (801) 413-1620
Attorneys for Ticaboo Utility Improvement District

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application for Amendment to the Certificate of Public Convenience and Necessity of Ticaboo Utility Improvement District	RESPONSES TO SPECIFIC QUESTIONS FROM THE DIVISION OF PUBLIC UTILITIES Docket No. 18-2508-01
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The following are response to specific questions posed to TUID by Doug Wheelwright of the Division of Public Utilities. Questions from Mr. Wheelwright are italicized and TUID's Responses follow each question.

- 1. The application talked generally about achieving economies of scale by serving more customers and spreading the cost to operate TUID over a larger customer base. How many additional customers would be added if TUID were to provide service to Bullfrog? How many additional customers would be added at Halls Crossing? How many additional customers would be added at Dangling Rope? How many additional customers would be added at Hite?*

To the best of TUID's and UAMPS's current knowledge, and based on the specifics outlined in the industry day announcement from NPS, NPS would be the customer at each of these locations and the distribution of power within the NPS facilities would be handled completely by NPS or its concessionaire. As such, for TUID, each NPS facility would be a single customer. TUID anticipates that each facility would be subject to a specific rate schedule or that TUID would provide power to NPS pursuant to one or more power purchase agreements.

Although number of customers does not provide a meaningful metric here, total electrical usage does illustrate the scale of each facility compared to Ticaboo. Approximate total annual energy use:

- Ticaboo (current customers): 505,000 kWh
- Bullfrog Marina: 5,300,000 kWh (per NPS)
- Halls Crossing Marina: 1,373,200 kWh (per NPS)
- Dangling Rope Marina: 108,500 kWh (per NPS)
- Hite Marina: 262,000 kWh (per NPS)

2. *It is the Divisions understanding that customers in the National Park would receive service from remote, stand-alone generation facilities and will not be connected to the existing TUID generation source. If the new customers are served from stand-alone facilities, how would the additional customers reduce the cost for the existing TUID customers?*

TUID anticipates that each NPS facility will be served by a modular standalone hybrid power system consisting of solar panels, diesel or propane generators, and potentially battery storage. TUID anticipates that the expansion of its service area and the addition of significant new customers will allow TUID to spread its administrative and overhead costs among more customers, allow TUID to place additional funds in reserves to be used in the future as necessary, and allow TUID to take advantage of significant economies of scale when purchasing fuel or equipment or engaging third-party service providers. TUID has no profit motivation and no investors to satisfy. TUID is only pursuing these projects as an avenue to reduce the costs of electrical service to TUID's customers. TUID will only pursue these projects if they make sense from a customer standpoint. TUID has no other motivation.

3. *If the National Park Service RFP requires renewable generation facility be placed on property that is not included in the National Park, has TUID located possible sites for future solar facilities? If so, what is the distance from the proposed generation site to the interconnection point at each location?*

The proposed South Power Station to serve Bullfrog Marina and nearby loads would likely be located on State of Utah School and Institutional Trust Lands Administration land as close as 1.6 miles from the from the NPS interconnection point. The exact parcel of SITLA land has not been specifically identified but TUID is in discussions with SITLA and the various leaseholders. TUID expects that the South Power Station would be no more than 6 miles from the NPS interconnection point in the worst-case scenario.

4. *Does TUID have an estimate of the cost to install stand-alone solar facilities at Bullfrog, Halls Crossing, Hite and Dangling Rope?*

These facilities will presumably be hybrid systems with solar generation, diesel or propane generators, and potentially battery storage. TUID only has indicative costs for the Bullfrog area. These estimates are presented in a separate document that will be filed in the near future as confidential pursuant to Commission Rules 746-1-602 and -603. TUID, with the assistance of UAMPS, will review the current service at Halls Crossing, Hite and Dangling Rope to see how service might be improved and then develop the costs of such improvements.

5. *Does TUID have an estimate of the cost to connect the new generation facilities to the existing infrastructure at Bullfrog, Halls Crossing, Hite and Dangling Rope?*

TUID only has indicative costs to interconnect the South Power Station to Bullfrog. These figures are presented in a separate document that will be filed in the near future as confidential pursuant to Commission Rules 746-1-602 and -603.

6. *Do the connecting lines between the solar generation facilities and the customers need to be underground lines or are overhead lines allowed in the National Park?*

All distribution lines are currently planned to be underground.

7. *Please provide additional information concerning the existing electrical facilities in place at Bullfrog Marina, Halls Crossing, Dangling Rope and Hite.*

Please refer to the NPS industry day announcement that was filed with the supplemental information for details of current power generation systems. To the extent that TUID or UAMPS obtains additional material information on the existing systems, TUID will share that information with the Division.

8. *Have representatives of TUID or other representatives inspected the current electrical infrastructure at the various sites in the National Park?*

TUID has not visited or inspected the existing generation equipment at the NPS facilities.

9. *Does the successful bidder have to purchase the existing electric infrastructure from the National Parks Service or is there some type of service agreement for the existing facilities?*

NPS has not mentioned or alluded to a requirement that a successful bidder purchase any existing equipment. With the caveat that this is unfounded opinion, TUID and UAMPS expect that eventual proposals will involve removing existing equipment and constructing new power systems but that reuse of existing equipment is not likely to be prohibited.

10. Is the successful bidder responsible for operation and maintenance costs for all of the existing electrical infrastructure to the end user?

This is currently unknown. TUID believes that at least some other NPS facilities in other parts of the country have taken the approach of having a public power supplier take over all electrical infrastructure within NPS facilities, but NPS has not yet provided that level of detail here. To the extent that TUID obtains additional material information on this topic, TUID will share that information with the Division.

11. Are the current customers within the National Park receiving monthly electricity bills from the current provider? If not, how do current customers pay for the amount of electricity that is used each month?

TUID believes, but has not confirmed, that all electrical service within the NPS facilities in Glen Canyon NRA is metered and billed by NPS. To the extent that TUID or UAMPS obtain additional material information on this topic, TUID will share that information with the Division.

12. Do the existing customers in Bullfrog and Halls Crossing have existing meters to measure the amount of electricity used?

TUID believes, but has not confirmed, that all electrical service within Bullfrog Marina and Halls Crossing is metered and billed by NPS. To the extent that TUID or UAMPS obtain additional material information on this topic, TUID will share that information with the Division.

13. What are the current rates or charges for electric service at Bullfrog, Halls Crossing, Dangling Rope and Hite?

Unknown. To the extent that TUID or UAMPS obtain additional material information on this topic, TUID will share that information with the Division.

14. If the electric customers within the National Park are not on individual meters and are not receiving monthly billing for electric service, how would TUID allocate the cost of service and receive payment for electric service from National Park customers?

Regardless of an eventual customer structure, TUID will carefully examine its rates (and/or terms of a possible PPA with NPS) to ensure that Ticaboo residents are not subsidizing service to NPS or other facilities. As has been mentioned, TUID expects that serving additional customers will include significant revisions to TUID's tariff.

- 15. Please provide the estimated total cost for new facilities, connection cost, facility upgrades and improvements that will be needed if TUID were to be the successful bidder for the National Parks Service contract.*

See responses to Questions 4 and 5, above.

- 16. If TUID were to be granted the expanded service area to include the National Park but is not the successful bidder in the National Parks RFP, does TUID have any responsibility or obligation to the successful bidder of the National Park contract? Does the successful bidder have any responsibility or obligation to TUID?*

Based on initial research, a third-party supplying power to NPS facilities would be wholly exempt from Commission jurisdiction under Utah Code § 54-2-201(3)(a)(i) as a supplier to a “United States governmental entity” and would presumably be wholly uninvolved with TUID. As for TUID’s responsibilities to existing or future customers in the expanded service area, TUID is under the same obligations under Utah Code Title 54 with respect to those people or entities as are the current electrical utilities with those area as part of their respective service areas.

- 17. What are the cost savings and other benefits projected to be for existing customers of the proposed expanded area (encompassing Bullfrog, Halls Crossing, Hite and Dangling Rope)?*

TUID does not have details of the current cost of generating electricity for these sites and NPS has not made such information public. TUID cannot force NPS to buy power from TUID. Presumably NPS will not agree to buy power from TUID or any other supplier unless it makes economic sense for NPS.

- 18. What additional fees are anticipated to be charged to the existing customers of the expanded area?*

TUID will carefully examine its rates (and/or terms of a possible PPA with NPS) to ensure that Ticaboo residents are not subsidizing service to NPS or other facilities. Any additional fees would be a part of this rate study. As has been mentioned, TUID expects that serving additional customers will include significant revisions to TUID’s tariff.

- 19. Does TUID have any financial projections or forecasts to show the impact of the proposed expansion? If so please provide.*

TUID only has indicative costs for the Bullfrog area. These estimates are presented in a separate document that will be filed in the near future as confidential pursuant to Commission Rules 746-1-602 and -603. TUID will review the current service at Halls

Crossing, Hite and Dangling Rope to see how service might be improved and then develop the costs of such improvements.