February 14, 2020

To: Michael J. Hammer

From: W. Michael Sessions

Re: Docket # 19-035-31

Mr. Hammer:

I came away from the hearing yesterday with more questions than answers. While I admit that I do not understand all the workings of the power supply industry, I am able to recognize when something sounds wrong or inconsistent. Yesterday I heard several things that met those criteria and it caused me to do some research to get answers.

First, I heard that the transformer I needed according to their newly produced chart RMP2) is a 25 KVA even if my house was one third the size it is. According to their chart, even a less than 1300 sq. ft. home needs a 25 KVA transformer. How can that be right if 5 houses that are all larger than 1300 sf ft are being serviced by one 10 KVA transformer?

Second, I learned that the cost of a new KVA transformer was only $1377 rather than the $2,500 previously quoted. Why was I quoted a cost that was almost double the actual cost?

Third, I learned that the previous quote of my house being projected to use 6 KVA per meter was wrong because their chart (exhibit RMP2) clearly shows that my home, which they consider a duplex would have a peak KVA of 26 and would require a 50 KVA transformer. How does this reconcile with 5 customers on a 10 KVA transformer? And why did they not put up a 50 KVA transformer per their chart?

So, I came home and went to the internet. Since I asked Rocky Mountain Power for a copy of my usage for the last 12 months (copy attached), I needed to know how to convert my usage into KVA to determine the size of transformer I needed. I found a site entitled, "How to Calculate KVA from the Electric Bill." Since we now have the benefit of knowing my power usage from the 13-month history RMP provided, I plugged my actual information into their formulas. I took my highest period of usage which was 1021 kilowatt hours for 33 days. I called RMP to get the power factor needed in the formula and they looked and said it was 1.

The website steps are:

1. Find the kilowatt hours of usage on the bills. Again, my highest was 1021 for 33 days.

2. Next, I needed to convert days into hours, so I multiplied 33 days times 24 hours in a day to get 792 hours.
3. Next, I needed to find the power factor, which is 1 per their office.
4. Next, we divide the kilowatt hours by the number of actual hours, or 1021 divided by 792 and the result is 1.29 KW
5. Next, we calculate KVA (Kilovolt-amperes) by dividing the KW in #4 above by the power factor (pf) RMP provided. That would be 1.29 divided by 1 which means my house at the highest usage period would need a 1.29 KVA transformer.

While this helps me understand how 5 neighbor houses could be serviced by a single 10 KVA transformer, it still might not be fair since a third of the hours in the formula are night hours when usage is minimal. If I took out 8 nighttime hours per day, it would make my KVA needs 1.93. Still, that might not represent my peak needs, so let's double the number and take me up to 4 KVA as the peak. Clearly, based upon my usage, a 5 KVA transformer would meet my needs without any trouble. Since I had a 10 KVA transformer, that is enough to cover 2.5 times my estimated peak need.

Appliances today are more efficient. Insulation requirements are much higher. LED lights are more energy efficient. And, oversizing of furnaces and air conditioners is no longer allowed. Their estimates are wrong, their chart is inordinately high showing that no house should have less than a 25 KVA transformer and they have taken advantage of me because I did not speak their language. Now, I do understand the relationship of usage to transformer size. And, I say shame on them for trying to overcharge me or anyone else.

I apologize for bringing this up after the fact, but I was just hit with the new chart yesterday and I was given no time to analyze it. It just made me say, "this cannot be right." And, indeed, it is not right. If it was an approved standard, why was it not shown to me 18 months ago. It was printed in 2016, so it is not new.

There was no increase in capacity caused by my upgrade in service and there was no line extension as defined in the tariff. This is clearly a replacement of a defective pole and cross arm and a company seizing the opportunity to upgrade their equipment by replacing a 50-year old transformer with a new one. Their attempt to have me pay over half the costs is grossly unfair.

I would appreciate a check from Rocky Mountain Power for the amount I was forced to pay them plus my electrician's bill, my trench cost and my legal costs. I think they can see that I will not let this rest until this wrong is righted.

W. Michael Sessions

CERTIFICATE OF SERVICE

I CERTIFY that on January 30, 2020, a true and correct copy of the foregoing was served upon the following as indicated below:

By Email:

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W. Michael Sessions

Table 1—Summer Peaking, Single-Family, Ducted Heat Source: Gas, Heat Pump, Other Estimated Peak Demand (kVA) per Residence

Home Size (Effective/Total ft.²)		< 1300 ft.²		1300-2000 ft.²		2001-3500 ft.²		3501-4500 ft.²		4501-6000 ft.²	
Number of Customers	CF	Peak Load	XFMR Size	Peak Load	XFMR Size	Peak Load	XFMR Size	Peak Load	XFMR Size	Peak Load	XFMR Size
1	1	8	25	10	25	14	25	17	25	22	25
2	0.9	15	25	18	25	26	50	31	50	40	50
3	0.86	21	25	26	50	37	50	44	50	57	75
4	0.82	27	50	33	50	46	50	56	75	73	75
5	0.78	32	50	39	50	55	75	67	75	86	100[1]
6	0.76	37	50	46	50	64	75	78	100[1]	101	167[1]
7	0.74	42	50	52	75	73	75	89	100[1]	114	167[1]
8	0.72	47	50	58	75	81	100[1]	98	100[1]	127	167[1]
9	0.71	52	75	64	75	90	100[1]	109	167[1]	141	167[1]
10	0.7	56	75	70	75	98	100[1]	119	167[1]	154	167[1]
11	0.7	62	75	77	100[1]	108	167[1]	131	167[1]	170	*
12	0.7	68	75	84	100[1]	118	167[1]	143	167[1]	185	*
13	0.7	73	75	91	100[1]	128	167[1]	155	167[1]	201	*
14	0.7	79	100[1]	98	100[1]	138	167[1]	167	167[1]	216	*
15	0.7	84	100[1]	105	167[1]	147	167[1]	179	*	231	*
16	0.7	90	100[1]	112	167[1]	157	167[1]	191	*	247	*
17	0.7	96	100[1]	119	167[1]	167	167[1]	203	*	262	*
18	0.7	101	167[1]	126	167[1]	177	*	215	*	278	*
19	0.7	107	167[1]	133	167[1]	187	*	227	*	293	*
20	0.7	112	167[1]	140	167[1]	196	*	238	*	308	*

[1] Consult with engineering prior to installing transformers 100 kVA or greater for single-phase, residential services.

* Multiple service transformers required.

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Billing and Usage History*

Agreement # 83362265-001-004
Site Address: 4587 S 1150 W, Riverdale, Utah

Month	Read Date	Days	KWH Usage	Invoice
02	02/05/2020	29	379	$41.67
01	01/07/2020	33	741	$81.97
12	12/05/2019	34	527	$57.89
11	11/01/2019	29	394	$43.12
10	10/03/2019	29	396	$43.31
09	09/04/2019	30	672	$76.70
08	08/05/2019	33	781	$90.71
07	07/03/2019	29	455	$50.84
06	06/04/2019	32	291	$33.82
05	05/03/2019	29	404	$44.21
04	04/04/2019	29	530	$58.36
03	03/06/2019	29	662	$73.24
02	02/05/2019	29	550	$60.63

* Information provided for the requested time period is valid as of the date this letter was created. Adjustments or other account activity may result in different information at a later date.

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Billing and Usage History*

Agreement # 83362265-001-003
Site Address: 4589 S 1150 W, Riverdale, Utah

Month	Read Date	Days	KWH Usage	Invoice
02	02/05/2020	29	205	$25.48
01	01/07/2020	33	280	$32.46
12	12/05/2019	34	247	$29.40
11	11/01/2019	29	185	$23.65
10	10/03/2019	29	145	$19.94
09	09/04/2019	30	158	$21.14
08	08/05/2019	33	186	$23.91
07	07/03/2019	29	163	$21.78
06	06/04/2019	32	175	$22.90
05	05/03/2019	29	164	$21.73
04	04/04/2019	29	159	$21.25
03	03/06/2019	29	130	$18.54
02	02/05/2019	29	144	$19.85

* Information provided for the requested time period is valid as of the date this letter was created. Adjustments or other account activity may result in different information at a later date.

Mike Sessions
Electric Billings

Date Read	Upstairs KWH Usage	Meter Amount	Downstairs KWH Usage	Meter Amount	Total Usage	Total Amount
2/5/2020	379.00	41.67	205.00	25.48	584.00	67.15
1/7/2020	741.00	81.97	280.00	32.46	1,021.00	114.43
12/5/2019	527.00	57.89	247.00	29.40	774.00	87.29
11/1/2019	394.00	43.12	185.00	23.65	579.00	66.77
10/3/2019	396.00	43.31	145.00	19.94	541.00	63.25
9/4/2019	672.00	76.70	158.00	21.14	830.00	97.84
8/5/2019	781.00	90.71	186.00	23.91	967.00	114.62
7/3/2019	455.00	50.84	163.00	21.78	618.00	72.62
6/4/2019	291.00	33.82	175.00	22.90	466.00	56.72
5/3/2019	404.00	44.21	164.00	21.73	568.00	65.94
4/4/2019	530.00	58.36	159.00	21.25	689.00	79.61
3/6/2019	662.00	73.24	130.00	18.54	792.00	91.78
Total	6,232.00	695.84	2,197.00	282.18	8,429.00	978.02
Monthly Average	519.33	57.99	183.08	23.52	702.42	81.50