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Department of Commerce

Division of Public Utilities

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REPLY COMMENTS

To: Utah Public Service Commission

From: Utah Division of Public Utilities
Chris Parker, Director
Energy Section
Artie Powell, Manager
Abdinasir Abdulle, Utility Analyst
Justin Christensen, Utility Analyst

Date: May 22, 2019

Re: 19-035-T07. Schedule 37 Avoided Cost Purchases from QFs

On April 30, 2019, PacifiCorp filed Advice No. 19-08, proposing revisions to Electric Service Schedule 37, Avoided Cost Purchases from Qualifying Facilities. On May 1, 2019, the Commission issued a Notice of Filing and Comment Period in which it indicated that comments and reply comments are to be submitted on **Wednesday, May 15, 2019** and **Wednesday, May 22, 2019**, respectively.

In compliance with this Commission Notice, the Division submitted its comments on May 15, 2019. In preparing those comments, the Division noticed that the input changes contained in the 2019.Q1 Avoided Cost Input Changes Quarterly Compliance Filing (Schedule 38 compliance filing) were also used to prepare the Schedule 37 avoided costs. Hence, the Division decided to file both Schedules 37 and 38 compliance filings on May 15, 2019.

On May 15, 2019, Utah Clean Energy (UCE) also filed comments on the Schedule 38 compliance filing requesting PacifiCorp to explain its rationale for making a change to the capacity factor used in calculating the thermal generation avoided cost rate. Though the Division did not notice this proposed change when it was preparing its comments, the Division believes that this is a major change. The Division is scheduled to have a teleconference with PacifiCorp in the afternoon today (May 22, 2019) to discuss the issue with PacifiCorp.

Therefore the Division recommends that the Commission acknowledge RMP's filing as complying with the Commission Orders in Docket Nos. 08-035-78 and 12-035-T10 contingent on the resolution of the issues UCE raised in Schedule 38.

CC: Jana Saba, RMP
Michele Beck, OCS