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State of Utah Department of Commerce Division of Public Utilities

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DIVISION OF PUBLIC UTILITIES COMMENTS

To: Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
Energy Section
Artie Powell, Manager
Abdinasir M. Abdulle, Technical Consultant
Charles Peterson, Technical Consultant

Date: July 9, 2019

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

RECOMMENDATION (Acknowledge)

The Division of Public Utilities (“Division”) has reviewed Rocky Mountain Power’s (“RMP”) Corrected Advice Filing 19-08, Docket No. 19-035-T07 that was filed with the Public Service Commission (“Commission”) on June 24, 2019. 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.

ISSUE

On June 24, 2019, RMP filed with the Commission its Corrected Advice Filing 19-08 in Docket No. 19-035-T07 in which it files some information that was inadvertently omitted from its original filing dated April 30, 2019. Rocky Mountain Power is requesting an effective date of July 31, 2019.

DISCUSSION

On April 30, 2019, in compliance with previous Commission Orders, RMP filed its Advice Filing 19-08, in which it requested tariff changes to Schedule 37 – Avoided cost purchases from small qualifying facilities. On May 1, 2019, the Commission issued a Notice of Filing and Comment Period in which it asked any interested party to submit comments on or before Wednesday, May 15, 2019 and reply comment on or before Wednesday, May 22, 2019.

In its reply comments dated May 22, 2019, the Division expressed concern about a proposed change in the capacity factor used to calculate avoided cost prices and recommended the Commission acknowledge RMP's proposed revisions to Schedule 37 contingent on the resolution of the issues UCE raised in Schedule 38.

On May 29, 2019, because the reply comment deadline (June 7, 2019) related to the capacity factor modification in Schedule 38 compliance filing, Docket No. 19-035-18, was after RMP's proposed effective date of Schedule 37 avoided cost prices (June 3, 2019), the Commission suspended RMP's proposed tariff changes in this Docket.

On May 31, 2019, RMP filed its comments on the Schedule 38 compliance filing indicating that the capacity factor change affects only avoided cost price calculations for baseload QF avoided cost prices under Schedule 38. Consequently, on June 11, 2019, the Commission approved the Company's proposed changes to Schedule 37.

On June 24, 2019, RMP filed its Corrected Advice Filing 19-08, Docket No. 19-035-T07. The correction that is made is the inclusion of 2019 Schedule 37 rates for all resource types, which RMP indicated was inadvertently omitted from its proposed revisions to Schedule 37 rates, filed on April 30, 2019. The Division reviewed the added 2019 Schedule 37 rates and determined that the calculation is consistent with the Commission approved methodology. Therefore, the Division recommends the Commission acknowledge the Corrected Advice Filing 19-08.

CC: Jana Saba, RMP
Michele Beck, OCS