



State of Utah
Department of Commerce
Division of Public Utilities

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Action Request Response

To: Utah Public Service Commission

From: Utah Division of Public Utilities
Chris Parker, Director
Artie Powell, Manager
Doug Wheelwright, Utility Technical Consultant Supervisor
Bob Davis, Utility Technical Consultant

Date: January 13, 2020

Re: **Docket No. 19-035-T08**, – Rocky Mountain Power’s Proposed Changes to Schedule 73, Subscriber Solar Program Rider - Optional.

Recommendation (Approval)

The Division of Public Utilities (“Division”) has reviewed Rocky Mountain Power’s (“RMP”) supplemental filing and recommends the Public Service Commission (“Commission”) approve RMP’s proposed revisions to Electric Service Regulation No. 73 (Subscriber Solar Program Rider - Optional), Sheet 73.4. The Division concludes RMP’s proposal is reasonable and in the public interest.

Issue and Background

On September 18, 2019, RMP submitted a Supplemental Filing with proposed revisions to Schedule No. 73, Sheets 73.1 through 73.4. On October 25, 2019, RMP submitted updated revisions to Sheets 73.1, 73.2, and 73.3 in its reply comments based on recommendations made in party comments. On November 18, 2019, the Commission approved RMP’s revisions to Sheets 73.1 through 73.3. On January 10, 2020, RMP submitted its revised Sheet 73.4 after it had realized Sheet 73.4 was not included in its October 25 filing. On January 10, 2020, the Commission issued an Action Request to the Division asking it to investigate the tariff and

respond as soon as possible. RMP requests an effective date of January 1, 2020. This memorandum represents the Division's comments.

Discussion

RMP's filing on September 18, 2019 included revised Sheet 73.4, which included paragraph 14. However, its supplemental filing on October 25, 2019, RMP inadvertently omitted Sheet 73.4 due to formatting errors where paragraph 14 reverted back to Sheet 73.3 and Sheet 73.4 was not included in its supplemental filing.

The Division concludes the revisions to Sheet 73.4 are minor and consistent with those filed by RMP on September 18, 2019 as Exhibit C. Paragraphs 15 and 16 had no further revisions from party comments to the September 18, 2019 filing and simply an oversight to not include the sheet in the October 25 filing.

The Division's review of RMP's supplemental filing also includes a compliance review of the revised tariff sheets for this matter. The Division reviewed Utah Administrative Code Rule 746-405-2(D)(3)(g), which requires a statement that the tariff sheets proposed do not constitute a violation of state law or Commission rule. However, the rule also states that the filing of proposed tariff sheets shall of itself constitute the representation of the filing utility that it, in good faith, believes the proposed sheets or revised sheets to be consistent with applicable statutes, rules and orders. The filing does not appear to violate statute or rule.

Conclusion

The Division investigated RMP's supplemental filing to Electric Service Schedule No. 73 (Subscriber Solar Program Rider - Optional), Sheet 73.4, and concludes that RMP's supplemental filing reflects its September 18, 2019, and October 25, 2019 filings. Therefore, the Division recommends the Commission approve RMP's changes to Electric Service Schedule No. 73, Sheet 73.4, with an effective date of January 1, 2020.

Cc: Michael Snow, RMP
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