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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, Energy Section Manager
Bob Davis, Utility Technical Consultant

Date: June 17, 2019

Re: Approve Tariff Sheet Changes, Docket No. 19-035-T09 – Rocky Mountain Power’s Proposed Tariff Revisions to Schedule No. 135, Net Metering Services.

Recommendation (Approval)

The Division of Public Utilities (“Division”) recommends the Public Service Commission (“Commission”) approve Rocky Mountain Power’s (“RMP”) proposed revisions to Schedule 135, effective July 1, 2019. The Division determined that RMP’s filing complies with the Commission’s Order in Docket No. 08-035-78, dated February 12, 2009.

Issue

On May 31, 2019, RMP filed with the Commission its proposed revisions to Electric Service Schedule No. 135, Net Metering Service, valuing net excess generation credits for large non-residential customers. RMP requests an effective date of July 1, 2019. On May 31, 2019, the Commission issued an action request to the Division requesting it to investigate RMP’s filing and make recommendations. The Commission asked the Division to report back by June 17, 2019. This memorandum represents the Division’s response to the Commission’s request to investigate RMP’s filing.

Background

The Commission's February 12, 2009 Order in Docket No. 08-035-78¹, directed RMP to update tariff Schedule No. 135 annually to reflect the value of net excess generation credits for large non-residential customers based on the average retail rates for the previous year's FERC Form No. 1.²

Discussion

In compliance with the Commission's Order, RMP filed its Fifth Revision to Sheet No. 135.4 of Electric Service Schedule No. 135. This sheet contains the updated net excess generation credits for large non-residential customers in Schedule 135. RMP also provided Exhibit 1, which shows the calculations for the average retail credits for large non-residential customers. The Division reviewed the variance between the numbers in Exhibit 1 used to calculate the average credits and the current FERC Form No. 1. The Division concludes that the calculations are correct. The \$.001 overall difference between Exhibit 1 and FERC Form 1 - Utah Supplemental is negligible. The Division notes that the individual change in rates for customer classes 6, 6A, 6B, 8 and 10 is less than 10 percent.

In review of RMP's advice letter 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 concludes that RMP's filing complies with the Commission's Order and recommends that the Commission approve RMP's filing effective July 1, 2019.

Cc: Joelle Steward, RMP
Jana Saba, RMP
Michele Beck, OCS

¹ See <https://pscdocs.utah.gov/electric/08docs/0803578/0803578ROdtm.pdf>, Section V. Issue 2.b., page 20.

² See <https://pscdocs.utah.gov/electric/19docs/1903508/307948RMPUT2018AnnRprt4-30-19.pdf>.