



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
Bob Davis, Utility Technical Consultant

Date: October 7, 2019

Re: Approve Tariff Sheet Changes, Docket No. 19-035-T13 – Rocky Mountain Power’s Proposed Tariff Revisions to Electric Service Regulation No. 6, Company’s Installation.

Recommendation (Approval)

The Division of Public Utilities (“Division”) recommends the Public Service Commission (“Commission”) approve Rocky Mountain Power’s (“RMP”) proposed revisions to Electric Service Regulation No. 6, effective January 1, 2020.

Issue

On September 24, 2019, RMP filed with the Commission its proposed revisions to Electric Service Regulation No. 6, Company’s Installation, to add a single-phase, 240-480 volt service. RMP requests an effective date of January 1, 2020. On September 24, 2019, the Commission issued an action request to the Division requesting it to review RMP’s filing and make recommendations. The Commission asked the Division to report back by October 9, 2019. On September 25, 2019, the Commission issued its Notice of Filing and Comment Period allowing comments on or before October 9, 2019 and reply comments on or before October 16,

2019. This memorandum represents the Division's response to the Commission's request to review RMP's filing.

Background

RMP's proposed change to Electric Service Regulation No. 6 adds a single-phase 240/480 volt, 3-wire, grounded option to the existing single and three-phase services for standard secondary service for customers who have access to only single-phase service but require three-phase service.

Discussion

RMP states that approximately forty-percent of its distribution lines are constructed as single-phase power, and the lack of a three-phase power supply can create costly challenges for customers with equipment that requires three-phase power (e.g., electric motors, irrigation pump motors, sewage lift stations, and mine ventilation).¹

RMP claims that if capacity is available on its single-phase line, its proposed service can be used in conjunction with either a variable frequency drive or rotary phase converter to derive three-phase power for its customers.² This solution greatly reduces the cost to customers and the company by avoiding construction or replacement of new power lines and distribution equipment.

RMP anticipates that its proposed service will have very little impact on its current construction standards, practices, and inventory requirements. RMP anticipates some additional inventory requirements to support pad-mount transformer installations but no impact to overhead transformer inventory levels or metering.

The Division does not have the expertise to fully vet the engineering aspects of the variable frequency drive or rotary phase converter technologies, but concludes that RMP's proposal is a reasonable solution that meets customer needs while mitigating costs.

¹ RMP Application, Docket No. 19-035-T13, Advice No. 19-13, September 24, 2019, pg. 1.

² Variable Frequency Drive ("VFD") see <https://www.ecmweb.com/print/8377>. Rotary Phase Converter ("RPC") see <https://www.northamericaphaseconverters.com/rotary-phase-converter-work/>.

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 has reviewed RMP's filing and concludes that its proposal to add an option for a single-phase, 240-480 volt, three-wire, grounded secondary service is in the public interest and recommends that the Commission approve RMP's filing effective January 1, 2020.

Cc: Joelle Steward, RMP
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