

November 20, 2019

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

Re: **Docket No. 19-035-T14**
Rocky Mountain Power's Proposed Tariff Revisions to Electric Service
Regulation No. 4, Supply and Use of Service
Reply Comments (Second)

On September 25, 2019, PacifiCorp d.b.a Rocky Mountain Power ("Company") filed proposed revised tariff pages associated with Electric Service Regulation No. 4 (Supply and Use of Service). The Public Service Commission of Utah ("Commission") issued a Notice of Filing and Comment Period on September 26, 2019 ("First Notice") that set a deadline for comments from interested parties by October 10, 2019 and reply comments on October 17, 2019. In accordance with the First Notice, the Division of Public Utilities ("Division") filed comments on the Company's proposed revised tariff page stating that the requested modification is potentially necessary and in the public interest, but the Division did not fully understand the mechanics of the billing process and therefore requested that the Commission suspend Electric Service Regulation No. 4 to allow time for interested parties to gain understanding of the billing process. The Company's reply comments, filed October 17, 2019: 1) informed the Commission that a meeting was scheduled with the Division to discuss the billing process; and 2) recommended that the Commission establish another comment period to provide the Division an opportunity to update its recommendation to the Commission once the meeting regarding the billing process occurred.

On October 22, 2019, the Commission issued a Second Notice of Filing and Comment Period and Order Suspending Tariff ("Second Notice") establishing a second comment period as requested by the Company. Per the Second Notice, the Division filed comments on November 5, 2019 concluding that the change is in the public interest and recommended the Commission approve the Company's proposed changes conditioned on the following recommendations:

- 1) Add language to Electric Service Regulation No. 4, Supply and Use of Service, Section No. 1(c)(2), Small Device Usage, which references monthly


- billing to an applicable schedule similar to the language under Section 1(c) for Fixed Loads as stated herein.
- 2) File an audit plan with the Commission that mitigates onerous backbills to Small Usage Device customers when backbilling is necessary.

The Company supports the Division's first recommendation and agrees to modify the sentence in its proposed rule change from, "The monthly kWh billed each month for such small usage devices shall be determined as the total kW capacity requirement of the Customer's equipment multiplied by 730 hours" to "Devices shall be billed monthly in accordance with the applicable schedule and the monthly kWh billed each month for such small usage devices shall be determined as the total kW capacity requirement of the Customer's equipment multiplied by 730 hours." The Company includes with its reply comments Sheet No. 4R.2 updated for this change as Exhibit A.

In response to the Division's second condition, the Company proposes the following audit plan: Each year the Company will send qualified personnel to test the current reading of at least one percent of its unmetered small usage devices to ensure participating customers have reported an accurate capacity. As conditions necessitate and particularly if a customer has under-reported its capacity levels, the Company may test additional devices. The Company requests that the Commission allow the Company some flexibility with this audit plan because at this time it is not known how many devices will be installed under unmetered service. As the Company gains experience with small unmetered usage devices, it will likely need to adapt its plans in response to the volume of unmetered devices deployed, the accuracy of self-reported customer wattages and the availability of qualified personnel to perform the audits.

The Company recommends that the Commission acknowledge this audit plan and approve the Company's revised tariff sheets included as Exhibit A.

Sincerely,



Joelle Steward
Vice President, Regulation

Enclosures

Exhibit A

ELECTRIC SERVICE REGULATION NO. 4 - Continued

1. SUPPLY OF SERVICE (continued)

(b) Reactive Power

All electric service schedules in this tariff are based upon the Customer minimizing his/her reactive power load.

- (1) The reactive kilovolt-ampere demands may be determined either by permanently installed instruments or by test. When determined by test, the resulting reactive demand will remain in effect until a new test is made.
- (2) When reactive power correction equipment is installed by the Customer, such equipment must be connected and switched in a manner acceptable to the Company.

(c) Unmetered Service

(1) Fixed Loads – Service to fixed loads, with fixed periods of operation, such as street lights, traffic lights and other similar installations may, for the convenience and mutual benefit of the Customer and the Company, be unmetered. The average monthly use (one twelfth of the annual use) determined by test or estimated from equipment ratings shall be billed monthly in accordance with the applicable schedule.

(2) Small Usage Devices – Devices whose total connected load does not exceed 2,000 watts per point of connection may be provided unmetered service if, at the sole discretion of the Company, usage is impractical or unsafe to meter. The monthly kWh billed each month for such small usage devices shall be determined as the total kWh capacity requirement of the Customer's equipment multiplied by 730 hours. Devices shall be billed monthly in accordance with the applicable schedule and the monthly kWh billed each month for such small usage devices shall be determined as the total kWh capacity requirement of the customer's equipment multiplied by 730 hours. The capacity requirement shall be stated on the Customer's application for service. Connection to Company's system will be made by Company, subject to Customer's installation meeting all of Company's design and installation requirements.

The Customer shall not change the capacity requirement or other aspects of their installation without first notifying the Company in writing a minimum of 30 days before changes are made. Customer's changes that render the service ineligible for unmetered service shall result in service being metered. Under such circumstances, Company approved metering point(s) must be installed by Customer within 30 days following notification or service will be disconnected.

The Company shall not be required to adjust billings due to failure of Customer's equipment. The Company shall have the right to test the capacity requirements of small usage devices from time to time. If the Company determines that the capacity was

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EFFECTIVE: ~~January 16, 2019~~ January 1, 2020

ELECTRIC SERVICE REGULATION NO. 4 - Continued

~~under-reported by the Customer or that the Customer otherwise failed to notify the Company of an increase in capacity, the Company may backbill for the incremental kWh associated with such increased capacity back to the date that service was first furnished.~~

~~**2. CUSTOMER'S USE OF SERVICE**~~

~~Electric Service will be supplied only to those for whom the Company is the sole source of electric power and energy unless otherwise provided under an appropriate agreement. Service shall be used by the Customer only for the purposes specified in the service agreement and applicable electric service schedule or schedules. If the Customer obtains any part of his/her electric requirements from any source other than the Company, supplementary or standby service will be supplied only under electric service schedules specifically applicable to such service.~~

~~**3. SERVICE TO TENANTS**~~

~~The Company supplies electric service for the exclusive use of the Customer. The Customer shall not extend his/her electric facilities for service to other Customers or premises and shall not resell electric service to any other person or entity unless taking service under electric service schedules that specifically provide for reselling.~~

~~Electric power purchased by Customers shall be used solely by the Customer and its tenants involved in the same business enterprise and associated activities on the same premises. The cost of the electric service shall either be absorbed, or reflected in the rent or in the price of the goods or services as an unidentifiable charge to the tenant. Such Customers may also enter into three party agreements to allow the Company to deliver power and energy to Customers' tenants through the Customers' electrical system.~~

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ELECTRIC SERVICE REGULATION NO. 4 - Continued

1. SUPPLY OF SERVICE (continued)

(b) Reactive Power

All electric service schedules in this tariff are based upon the Customer minimizing his/her reactive power load.

- (1) The reactive kilovolt-ampere demands may be determined either by permanently installed instruments or by test. When determined by test, the resulting reactive demand will remain in effect until a new test is made.
- (2) When reactive power correction equipment is installed by the Customer, such equipment must be connected and switched in a manner acceptable to the Company.

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(1) Fixed Loads – Service to fixed loads, with fixed periods of operation, such as street lights, traffic lights and other similar installations may, for the convenience and mutual benefit of the Customer and the Company, be unmetered. The average monthly use (one twelfth of the annual use) determined by test or estimated from equipment ratings shall be billed monthly in accordance with the applicable schedule.

(2) Small Usage Devices – Devices whose total connected load does not exceed 2,000 watts per point of connection may be provided unmetered service if, at the sole discretion of the Company, usage is impractical or unsafe to meter. Devices shall be billed monthly in accordance with the applicable schedule and the monthly kWh billed each month for such small usage devices shall be determined as the total kW capacity requirement of the customer's equipment multiplied by 730 hours. The capacity requirement shall be stated on the Customer's application for service. Connection to Company's system will be made by Company, subject to Customer's installation meeting all of Company's design and installation requirements.

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The Company shall not be required to adjust billings due to failure of Customer's equipment. The Company shall have the right to test the capacity requirements of small usage devices from time to time. If the Company determines that the capacity was under-reported by the Customer or that the Customer otherwise failed to notify the Company of an increase in capacity, the Company may backbill for the incremental kWh associated with such increased capacity back to the date that service was first furnished.

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CERTIFICATE OF SERVICE

Docket No. 19-035-T14

I hereby certify that on November 20, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov

Division of Public Utilities

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Rocky Mountain Power

Data Request Response Center datarequest@pacificorp.com

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Mary Penfield
Adviser, Regulatory Operations