

October 25, 2019

***VIA ELECTRONIC FILING***

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

Attn: Gary Widerburg  
Commission Administrator

RE: Advice No. 19-15  
Docket No. 19-035-T15  
Proposed Changes to Schedule Nos. 70 and 72, Renewable Energy Rider and Renewable Energy Rider Bulk Purchase

Enclosed for electronic filing are the proposed tariff sheets associated with Tariff P.S.C.U. No. 50 of PacifiCorp, d.b.a. Rocky Mountain Power (the “Company”), applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405-2(D), the Company states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Company respectfully requests an effective date of January 1, 2020 for these changes. The Company has made similar filings in all six states where the Blue Sky program is offered. The proposed changes described herein are contingent upon the Company receiving approval from all six states in order to maintain uniformity in program management operations.

First Revision of Sheet No. 70.1	Schedule 70	Renewable Energy Rider
First Revision of Sheet No. 72.1	Schedule 72	Renewable Energy Rider Bulk Purchase
First Revision of Sheet No. 72.2	Schedule 72	Renewable Energy Rider Bulk Purchase

The purpose of this filing is to propose changes to the Blue Sky Program (“Program”) administered through Electric Service Schedule Nos. 70 and 72, specifically to increase the standard Blue Sky block size from 100 kWh to 200 kWh of renewable energy with no increase to the Block price.

**DESCRIPTION OF CHANGES**

One of the ways the Company supports the development of renewable energy sources is through the Blue Sky Program. The Program was implemented to provide an option for customers who want to be served by renewable energy to voluntarily purchase Renewable Energy Credits (“RECs”) to offset some or all of their usage. In an effort to meet growing customer demands in the renewable energy sector and to better align with market conditions, the Company is proposing to increase the size of each Blue Sky Block from 100 kWh to 200 kWh of renewable energy. The increase to the Blue Sky Block size does not alter individually negotiated contracts, including any Blue Sky Select contracts currently in place, which are used to facilitate direct purchase of RECs or any future individually negotiated agreements.

As of September 2019, there were 47,999 participating Blue Sky Block customers in Utah. Several commercial and municipal customers are working towards green/renewable energy goals and are looking for other sources to help them meet their goals. The proposed change of doubling the amount of kilowatt-hours per Block for the same price will help customers increase the pace at which they can reach those goals. Increasing the size of Blue Sky Blocks and promoting the qualifying initiatives may also prove to be an additional incentive for customers to participate in the Program.

There are several indicators suggesting that customers want to support more renewable energy, but may not intuitively understand what a “block” represents. The average purchase size for the Block product across the customer base is around two Blocks. The recommendation to increase the Block size would better align customers’ perception with their intent. In addition, it would offer customers a lower cost path to matching all, or a larger portion, of their usage with renewable energy.

The Program is self-funded. Funds collected through the tariffs are used to acquire RECs and cover administration, Program growth, and maintenance costs. Funds remaining after REC purchases and Program marketing/administration expenses are made available to help fund new community-based renewable energy installations through a competitive grant application process. Increasing the number of kilowatt hours per Block will consequently reduce the funds available for these projects. While these community projects are impactful for the nonprofits and communities in which they are built, they do not have the same impact on the REC market that the Program could by increasing the number of RECs purchased and to keep the program competitive with non-regulated programs available to customers.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
[jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah Blvd., Suite 2000  
Portland, OR 97232

Informal inquiries regarding this matter may be directed to Jana Saba, Manager, State Regulatory Affairs at (801) 220-2823.

Sincerely,



Joelle Steward  
Vice President, Regulation

Enclosures

**ROCKY MOUNTAIN POWER**  
**ELECTRIC SERVICE SCHEDULE NO. 70**  
**STATE OF UTAH**

**Renewable Energy Rider - Optional**

**PURPOSE:** This Schedule is a voluntary program for Customers interested in supporting the purchase and development of Renewable Energy, as defined below. It gives Customers the opportunity to demonstrate their personal commitment by purchasing blocks of Renewable Energy to encourage further development of Renewable Energy resources in the Western region. Renewable Energy purchases under this Schedule are in addition to investments associated with the Company's Integrated Resource Plan. Rocky Mountain Power does not make a profit from this program, and all revenues and costs associated with this program stay with the program and do not go to the utility.

**AVAILABILITY:** At any point on the Company's interconnected system.

**APPLICATION:** To Customers receiving service under the Company's Electric Service Schedules.

**ADMINISTRATION:** Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases may be used to fund Qualifying Initiatives as defined below.

**BLOCK:** 1 Block equals ~~100~~200 kWh of Renewable Energy.

**CHARGE PER BLOCK:** \$1.95 per month

**MONTHLY BILL:** The Monthly Bill shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block. The Monthly Bill is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Monthly Bill shall be applied to the Customer's billing regardless of actual energy consumption.

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Issued by authority of Report and Order of the Public Service Commission of Utah in Docket Advice No. ~~13-~~035-18419-15

**FILED:** ~~September 5, 2014~~October 25, 2019

**EFFECTIVE:** ~~September 1, 2014~~January 1, 2020

**ROCKY MOUNTAIN POWER**  
**ELECTRIC SERVICE SCHEDULE NO. 72**  
**STATE OF UTAH**

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**Renewable Energy Rider - Optional**  
**Bulk Purchase Option**

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**PURPOSE:** This Schedule is a voluntary program for Customers interested in supporting the purchase and development of Renewable Energy, as defined below. It gives Customers the opportunity to demonstrate their personal commitment by purchasing blocks of Renewable Energy to encourage further development of Renewable Energy resources in the Western region. Renewable Energy purchases under this Schedule are in addition to investments associated with the Company's Integrated Resource Plan. Rocky Mountain Power does not make a profit from this program, and all revenues and costs associated with this program stay with the program and do not go to the utility.

**AVAILABILITY:** At any point on the Company's interconnected system.

**APPLICATION:** To Customers receiving service under the Company's non-residential Electric Service Schedules.

**ADMINISTRATION:** Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases to Block purchases may be used to fund Qualifying Initiatives as defined below.

**BLOCK:** 1 Block equals ~~100-200~~ kWh of Renewable Energy. This program requires a minimum purchase of ~~121.2 megawatt hours (121,200 kWh or 1,212 Blocks)~~ per year. For the purpose of qualifying for this Schedule, Customers with multiple sites can sum their Block purchases across all Pacific Power ~~& Light Company~~ and Rocky Mountain Power service territories to meet the minimum purchase requirement.

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~~035-18419-15~~

**FILED:** ~~September 5, 2014~~ October 25, 2019

**EFFECTIVE:** ~~September 1, 2014~~ January 1, 2020

**ELECTRIC SERVICE SCHEDULE NO. 72 - Continued**

**CHARGE PER BLOCK:** \$0.70 per month (~~\$7.00 per MWh per month~~)  
**Plus** \$1,500.00 per year fixed charge

For purchase commitments over two years in length or large purchase over 75,000 MWh per year, individually negotiated arrangements may be available, pursuant to the execution of a written contract.

**CHARGE:** The Charge can be billed either monthly, twice yearly or annually and shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block, plus the \$1,500 yearly fixed charge divided between the customer's billing choice (monthly, twice yearly or annually) and added to the Customer's standard bill. The Charge is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Charge shall be applied to the Customer's billing regardless of actual energy consumption.

**RENEWABLE ENERGY:** Renewable Energy includes the premium associated with bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;
- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;
- Pipeline or irrigation canal hydroelectric systems;
- wave or tidal action; and
- low emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservations such as creosote, pentachlorophenol or copper chrome arsenic.

Each Renewable Energy Credit (also known as Tradable Renewable Energy Credit, Renewable Energy Certificate, Green Tag or Carbon Credit) represents all of the regional and global environmental and emissions benefits associated with one unit of output from the qualifying renewable electricity generating resource. In some markets, the credits are certified by an independent third party and include a serial number for tracking purposes.

Offering must consist of 100% new Renewable Energy.

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**FILED:** ~~September 5, 2014~~ October 25, 2019

**EFFECTIVE:** ~~September 1, 2014~~ January 1, 2020

**ROCKY MOUNTAIN POWER**  
**ELECTRIC SERVICE SCHEDULE NO. 70**

**STATE OF UTAH**

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**Renewable Energy Rider - Optional**

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**PURPOSE:** This Schedule is a voluntary program for Customers interested in supporting the purchase and development of Renewable Energy, as defined below. It gives Customers the opportunity to demonstrate their personal commitment by purchasing blocks of Renewable Energy to encourage further development of Renewable Energy resources in the Western region. Renewable Energy purchases under this Schedule are in addition to investments associated with the Company's Integrated Resource Plan. Rocky Mountain Power does not make a profit from this program, and all revenues and costs associated with this program stay with the program and do not go to the utility.

**AVAILABILITY:** At any point on the Company's interconnected system.

**APPLICATION:** To Customers receiving service under the Company's Electric Service Schedules.

**ADMINISTRATION:** Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases may be used to fund Qualifying Initiatives as defined below.

**BLOCK:** 1 Block equals 200 kWh of Renewable Energy.

**CHARGE PER BLOCK:** \$1.95 per month

**MONTHLY BILL:** The Monthly Bill shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block. The Monthly Bill is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Monthly Bill shall be applied to the Customer's billing regardless of actual energy consumption.

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**ROCKY MOUNTAIN POWER  
ELECTRIC SERVICE SCHEDULE NO. 72**

**STATE OF UTAH**

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**Renewable Energy Rider - Optional**

**Bulk Purchase Option**

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**APPLICATION:** To Customers receiving service under the Company's non-residential Electric Service Schedules.

**ADMINISTRATION:** Funds received from Customers under this Schedule will cover program costs and match Renewable Energy purchases to Block purchases. Funds not spent after covering program costs and matching Renewable Energy purchases to Block purchases may be used to fund Qualifying Initiatives as defined below.

**BLOCK:** 1 Block equals 200 kWh of Renewable Energy. This program requires a minimum purchase of 1,212 Blocks per year. For the purpose of qualifying for this Schedule, Customers with multiple sites can sum their Block purchases across all Pacific Power and Rocky Mountain Power service territories to meet the minimum purchase requirement.

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**FILED:** October 25, 2019

**EFFECTIVE:** January 1, 2020

**ELECTRIC SERVICE SCHEDULE NO. 72 - Continued**

**CHARGE PER BLOCK:** \$0.70 per month  
**Plus** \$1,500.00 per year fixed charge

For purchase commitments over two years in length or large purchase over 75,000 MWh per year, individually negotiated arrangements may be available, pursuant to the execution of a written contract.

**CHARGE:** The Charge can be billed either monthly, twice yearly or annually and shall be the number of Blocks the Customer has agreed to purchase multiplied by the Charge per Block, plus the \$1,500 yearly fixed charge divided between the customer's billing choice (monthly, twice yearly or annually) and added to the Customer's standard bill. The Charge is in addition to all other charges contained in Customer's applicable tariff schedule. This rider's Charge shall be applied to the Customer's billing regardless of actual energy consumption.

**RENEWABLE ENERGY:** Renewable Energy includes the premium associated with bundled power or Renewable Energy Credits (RECs) derived from the following fuels:

- wind;
- solar;
- geothermal energy;
- certified low impact hydroelectric;
- hydrogen derived from photovoltaic electrolysis or a non-hydrocarbon derivation process;
- Pipeline or irrigation canal hydroelectric systems;
- wave or tidal action; and
- low emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservations such as creosote, pentachlorophenol or copper chrome arsenic.

Each Renewable Energy Credit (also known as Tradable Renewable Energy Credit, Renewable Energy Certificate, Green Tag or Carbon Credit) represents all of the regional and global environmental and emissions benefits associated with one unit of output from the qualifying renewable electricity generating resource. In some markets, the credits are certified by an independent third party and include a serial number for tracking purposes.

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**CERTIFICATE OF SERVICE**

Advice No. 19-15  
Docket No. 19-035-T15

I hereby certify that on October 25, 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](mailto:mbeck@utah.gov)

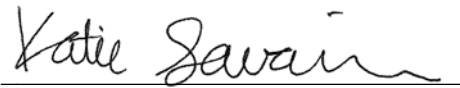
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**Rocky Mountain Power**

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