

December 13, 2019

VIA ELECTRONIC FILING

Utah Public Service Commission
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-T17
In the Matter of Rocky Mountain Power's Proposed Tariff Revisions to
Electric Service Schedule No. 94, Energy Balancing Account Pilot
Program
Reply Comments

On November 21, 2019, Rocky Mountain Power ("Company") filed proposed revisions to Electric Service Schedule No. 94 – Energy Balancing Account Pilot Program ("EBA") to implement the Public Service Commission of Utah's ("Commission") November 14, 2019 order in Docket No. 09-035-15, approving the EBA as an ongoing program and revising the carrying charge. On December 5, 2019, comments were submitted by the Division of Public Utilities ("Division") and the Office of Consumer Services ("Office"). The Division recommended the Commission approve the Company's changes as proposed. The Office made one recommended change which the Company addresses in its reply comments.

Response to the Office's Comments

The Office recommends modifying Electric Service Schedule 300 – Regulation Charges ("Schedule 300") to add a reference to the EBA because the EBA tariff changes recommended by the Company now reference the interest rate in Schedule 300. The Company urges the Commission reject this recommendation. Schedule 300 only lists interest rate charges associated with the Company's Regulations, not those associated with its Electric Service Schedules. Schedule 300 does not list any other Electric Service Schedules and balancing accounts interest rate charges. Adopting the Office's recommended modification may lead customers to incorrectly assume that Schedule 300 is a complete list of all of the Company's interest rate charges, for both its Regulations and its Electric Service Schedules.

To address the Office's concerns, the Company instead added additional clarifying edits to Sheet No. 94.1 to create a new defined term titled "EBA Carrying Charge Interest Rate" specifying that the interest rate will be the same as the customer deposit rate. Sheet No. 94.10 was also modified to refer to the EBA Carrying Charge Interest Rate instead of Schedule 300. The Company believes that this satisfies the Office's concern for clarity.

In accordance with Utah Code Ann. § 54-4-4 and the Public Service Commission Administrative Procedures Act Rule 746-405-2(E)(2), enclosed for filing are RMP's changes to Schedule 94. Specifically, enclosed are the revised tariff pages associated with Tariff P.S.C.U No. 50, applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405-2(D), the Company states that the revised tariff sheets do not constitute a violation of state law or Commission rule. The tariff sheets reflect an effective date of January 1, 2020 in accordance with the Order.

Second Revision of Sheet No. 94.1	Electric Service Schedule No. 94	Energy Balancing Account (EBA)
Fifth Revision of Sheet No. 94.10	Electric Service Schedule No. 94	Energy Balancing Account (EBA)

Sincerely,



Joelle Steward
Vice President, Regulation

CC: Service List - Docket No. 19-035-T17

ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 94
STATE OF UTAH

Energy Balancing Account (EBA)
Pilot Program

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

APPLICATION: This Schedule shall be applicable to all retail tariff Customers taking service under the terms contained in this Tariff. The collection of costs related to an energy balancing account from customers paying contract rates shall be governed by the terms of the contract. ~~Pursuant to Utah Code Section 54-7-13.5(6) amended in the 2016 general session of the Utah State Legislature, the EBA Pilot Program shall run until December 31, 2019.~~

DEFINITIONS:

Actual MWh: The actual MWh sold to retail customers recorded in the Company's billing records.

Base MWh: Retail MWh from the most recent general rate case.

EBA (Energy Balancing Account): The mechanism to collect or refund ~~a specified portion of the accumulated difference between Base EBAC and Actual EBAC. Through May 31, 2016, the specified portion is 70 percent (70%); starting June 1, 2016, the specified portion is 100 percent (100%). The use of the 100% specified portion shall remain in effect until December 31, 2019.~~

EBA Annual Filing Date: On or about March 15 of each year.

EBA Carrying Charge Interest Rate: Equal to the annual interest rate used for customer deposits as specified in Electric Service Schedule No. 300, Regulation Charges.

EBA Carrying Charge: The EBA Carrying Charge Interest Rate shall be divided by 12 to calculate the monthly interest rate, which shall be an annual interest rate as specified in Electric Service Schedule No. 300, Regulation Charges, shall be divided by 12 to calculate the monthly interest rate.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Advice Docket No. 16-0409-035-15/19-035-T17

FILED: ~~May 23, 2016~~ November 21 ~~December 13, 2019~~

EFFECTIVE: ~~June 1, 2016~~ January 1, 2020



First~~Second~~ Revision of Sheet No. 94.1

P.S.C.U. No. 50

Canceling ~~Original~~First Revision of Sheet No. 94.1

~~which shall be of 6% simple interest (.50% per month)~~ applied to the monthly balance in the EBA Deferral Account as described in this electric service schedule.

EBA Costs (EBAC): Actual EBAC and Base EBAC include all components of Net Power Cost (NPC) and wheeling revenue, typically booked to the FERC Accounts described in this electric service schedule.

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Issued by authority of Report and Order of the Public Service Commission of Utah in ~~Advice Docket No. 16-0409-035-15/19-035-T17~~

FILED: ~~May 23, 2016~~November 21~~December 13, 2019~~

EFFECTIVE: ~~June 1, 2016~~January 1, 2020

ELECTRIC SERVICE SCHEDULE NO. 94 – Continued

EBA Deferral Account Balance: the monthly EBA Account Balance will be calculated as follows:

$$\text{EBA Deferral Account Balance}_{\text{current month}} = \text{Ending Balance}_{\text{previous month}} + \text{Deferral}_{\text{current month}} \\ - \text{EBA Revenue}_{\text{current month}} + \text{EBA Carrying charge}_{\text{month}}$$

EBA CARRYING CHARGE: the EBA Carrying Charge will be calculated and applied to the monthly balance in the EBA Deferral Account as follows:

$$\text{EBA Carrying Charge}_{\text{month}} = [\text{Ending Balance}_{\text{previous month}} + (\text{Deferral}_{\text{current month}} \times 0.5) \\ - (\text{EBA Revenue}_{\text{current month}} \times 0.5)] \times \text{EBA Carrying Charge Interest Rate Electric Service Schedule No. 300 Interest Rate} / 12 \text{ } 0.5\%$$

EBA RATE DETERMINATION: Annually, on the EBA Filing Date, Rocky Mountain Power shall file with the Commission an application for establishment of an EBA rate to become effective on the EBA Rate Effective Date of that year. The EBA Deferral Account Balance as of December 31 shall be allocated to all retail tariff rate schedules and applicable special contracts based on the rate spread approved by the Commission. The new EBA rate will be determined by dividing the EBA Deferral Account Balance allocated to each rate schedule and applicable contract by the schedule or contract forecasted Power Charge and Energy Charge revenues. The EBA rate will be a percentage increase or decrease applied to the monthly Power Charges and Energy Charges of the Customer's applicable schedule or contract as set forth in the schedule.

AUDIT PROCEDURES: All items recorded in the EBA Balancing Account are subject to regulatory audit and prudence review. The Division of Public Utilities will complete its audit according to the EBA Procedural Schedule.

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Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. ~~18-035-0109-035-15/19-035-T17~~

FILED: ~~March 15, 2018~~ ~~November 21~~ December 13, 2019

EFFECTIVE: ~~May 1, 2018~~ January 1, 2020

**ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 94**

STATE OF UTAH

Energy Balancing Account (EBA)

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

APPLICATION: This Schedule shall be applicable to all retail tariff Customers taking service under the terms contained in this Tariff. The collection of costs related to an energy balancing account from customers paying contract rates shall be governed by the terms of the contract.

DEFINITIONS:

Actual MWh: The actual MWh sold to retail customers recorded in the Company's billing records.

Base MWh: Retail MWh from the most recent general rate case.

EBA (Energy Balancing Account): The mechanism to collect or refund the accumulated difference between Base EBAC and Actual EBAC.

EBA Annual Filing Date: On or about March 15 of each year.

EBA Carrying Charge Interest Rate: Equal to the annual interest rate used for customer deposits as specified in Electric Service Schedule No. 300, Regulation Charges.

EBA Carrying Charge: The EBA Carrying Charge Interest Rate shall be divided by 12 to calculate the monthly interest rate, which shall be applied to the monthly balance in the EBA Deferral Account as described in this electric service schedule.

EBA Costs (EBAC): Actual EBAC and Base EBAC include all components of Net Power Cost (NPC) and wheeling revenue, typically booked to the FERC Accounts described in this electric service schedule.

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Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. 09-035-15/19-035-T17

FILED: December 13, 2019

EFFECTIVE: January 1, 2020

ELECTRIC SERVICE SCHEDULE NO. 94 – Continued

EBA Deferral Account Balance: the monthly EBA Account Balance will be calculated as follows:

$$\text{EBA Deferral Account Balance}_{\text{current month}} = \text{Ending Balance}_{\text{previous month}} + \text{Deferral}_{\text{current month}} \\ - \text{EBA Revenue}_{\text{current month}} + \text{EBA Carrying charge}_{\text{month}}$$

EBA CARRYING CHARGE: the EBA Carrying Charge will be calculated and applied to the monthly balance in the EBA Deferral Account as follows:

$$\text{EBA Carrying Charge}_{\text{month}} = [\text{Ending Balance}_{\text{previous month}} + (\text{Deferral}_{\text{current month}} \times 0.5) \\ - (\text{EBA Revenue}_{\text{current month}} \times 0.5)] \times (\text{EBA Carrying Charge Interest Rate} / 12)$$

EBA RATE DETERMINATION: Annually, on the EBA Filing Date, Rocky Mountain Power shall file with the Commission an application for establishment of an EBA rate to become effective on the EBA Rate Effective Date of that year. The EBA Deferral Account Balance as of December 31 shall be allocated to all retail tariff rate schedules and applicable special contracts based on the rate spread approved by the Commission. The new EBA rate will be determined by dividing the EBA Deferral Account Balance allocated to each rate schedule and applicable contract by the schedule or contract forecasted Power Charge and Energy Charge revenues. The EBA rate will be a percentage increase or decrease applied to the monthly Power Charges and Energy Charges of the Customer's applicable schedule or contract as set forth in the schedule.

AUDIT PROCEDURES: All items recorded in the EBA Balancing Account are subject to regulatory audit and prudence review. The Division of Public Utilities will complete its audit according to the EBA Procedural Schedule.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. 09-035-15/19-035-T17

FILED: December 13, 2019

EFFECTIVE: January 1, 2020

CERTIFICATE OF SERVICE

Docket No. 19-035-T17

I hereby certify that on December 13, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

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