



State of Utah

Department of Commerce Division of Public Utilities

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ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Division of Public Utilities
Artie Powell, Director
Doug Wheelwright, Technical Consultant Supervisor
Bob Davis, Utility Technical Consultant
Gary Smith, Utility Technical Consultant
Justin Christensen, Utility Analyst

Date: May 20, 2020

Re: **Acknowledge Filing Requirements, Docket No. 20-035-04** – Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Recommendation (Acknowledge)

The Division of Public Utilities (“Division”) has performed a preliminary review of the Application. The Division believes the filing is substantially complete at this time based on the overall body of information in the filing. The Division found some instances where certain responses to filing requirements were in partial compliance with rule R746-700-1.E.1. However, the Division does not believe these deficiencies are significant and recommends that the Commission acknowledge Rocky Mountain Power’s filing as being complete.

Issue

On May 8, 2020, Rocky Mountain Power (“RMP”) filed an application with the Utah Public Service Commission (“Commission”) for authority to increase its Retail Electric Utility Service

Rates in Utah in accordance with the 240-day period provided under Utah Code Annotated Section 54-7-12(3)(a). Per Utah Code Annotated Section 54-7-12(2)(b)(ii), parties have 14 days to challenge the completeness of an application. The completeness of a filing for a general rate case of an Electric Corporation is defined by Utah Administrative Code R746-700-1, 10, 20, 21, 22, 23, and 30. On May 11, 2020, the Commission issued an Action Request to the Division asking it to review RMP's application and provide a recommendation as to whether the application constitutes a complete filing as defined in Utah Code Annotated Section 54-7-12(1)(b)(i) and consistent with Utah Administrative Code R746-700-10, 20, 21, and 22. The Commission asked the Division to respond by May 22, 2020. The following is the Division's response to the Commission's request.

Background

Utah Code Annotated Section 54-7-12(1)(b)(i) "Complete Filing" means an application filed by a public utility that substantially complies with minimum filing requirements established by the Commission, by rule, for a general rate increase or decrease. Utah Administrative Code R746-700-1(C) specifies the minimum filing requirements for a complete filing. Utah Administrative Code R746-700-10, R746-700-20, R746-700-21, R746-700-22, R746-700-23, R746-700-30, R746-700-40, R746-700-41, R746-700-50, and R746-700-51 set forth the information which must be contained in an application, testimony, exhibits, evidence, data, and any other informational documents filed with an application for the application to be considered a complete filing pursuant to Utah Code Annotated Sections 54-7-12(2) or 54-7-13.4(2).

Discussion

The Division has compared the application and accompanying files to the requirements located in Utah Administrative Code R746-700-1, R746-700-10, R746-700-20, R746-700-21, R746-700-22, and R746-700-23. R746-700-30, R746-700-40, R746-700-41, R746-700-50, and R746-700-51 do not apply to this filing. RMP included 700-20_Attachment 1_Application Index, per Utah Administrative Code R746-700-20. Although the Division performed basic verification procedures on the information provided by RMP for each rule, the Division makes no judgment

regarding the accuracy of the information or whether the Division agrees with the information as filed.

The filing rules allow the Division 14 days from the date of filing to review the filing for compliance. RMP's filing has two major Excel-based models as part of its filing that have hundreds of Excel spreadsheets for revenue requirement, cost of service/rate design, and a complicated web-based model for power costs. These models start with data that is imported or manually entered from RMP's general ledger and other sources and through inter-related formulas, linked spreadsheet cells and spreadsheets, macros or programs, produce results that determine revenue requirement, cost of service/rate design, and net power costs.

Given the time constraints the Division was unable to review every document, spreadsheet, or cell in the models for adherence to Utah Administrative Code R746-700-1.E.1 in great depth. The Division's preliminary review however, indicates that RMP provides formulas or cell relationships in its revenue and cost of service models that tie back to input from its general ledger. The power cost model is a web-based model used by RMP in past general rate cases and other cases in which all parties to those cases are familiar. The Division is relying on its past experience with this model for Utah Administrative Code R746-700-1.E.1 compliance. Per the filing requirements RMP indicates that access to the model is available upon request.

The Division notes that RMP provides Attachment 2 "List of Miscellaneous Commitments from Other Dockets" in its application. The DPU has reviewed the files given the representations made by RMP and assumes the files are true statements of fact and thus the DPU performed no other verification work for completeness of these files.

Certain other filing requirements such as requests for minutes, financial plans, tax returns, IRS tax correspondence, and external auditor work papers deemed by RMP to be highly confidential are not applicable in this filing. The DPU accepts RMP's representation that there are no highly confidential files contained within its filing. Should there be need to review highly confidential files, the Division plans to work with RMP to review such files in adherence to current Covid-19 guidelines.

Conclusion

The Division emphasizes that due to the short time frame provided under Utah Administrative Code R746-700, its review was high-level and is ongoing. Subject to the above discussion surrounding the spreadsheets, formulas, other documents, costing models, and the test year filing information, the Division concludes that RMP's filing, at least for the majority of the filing requirements, found in Utah Administrative Code R746-700-1, R746-700-10, R746-700-20, R746-700-21, R746-700-22, R746-700-23, and Utah Administrative Code R746-700-1.E.1 adheres to the Commission's filing requirements. Therefore, the Division recommends the Commission acknowledge the application as complete.

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