



State of Utah
Department of Commerce
Division of Public Utilities

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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director

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Date: January 28, 2021

Re: **Docket No. 21-035-T01**, Rocky Mountain Power's Tariff Sheets in Compliance with the Commission's Order in Docket No. 20-035-04, dated December 30, 2020.

Recommendation (Approval With Conditions)

The Division of Public Utilities (Division) has reviewed Rocky Mountain Power's (Company) Compliance Filing and verified its accuracy. The Division recommends the Public Service Commission of Utah (Commission) approve the Company's Compliance Filing pending certain corrections.

Issue

The Company submitted its tariff pages on January 13, 2021, with a proposed effective date of January 1, 2021. On January 13, 2021, the Commission issued an Action Request for the Division to review the tariff filing for compliance and report its findings and recommendation to

the Commission on January 28, 2021. Subsequently, the Commission issued a Notice of Filing and Comment Period giving interested parties until January 28, 2021 to provide comments with reply comments due February 4, 2021. The memorandum represents the Division's response to the Commission's Action Request.

Background

The Company submitted its tariff revisions in compliance with the Commission's Report and Order in Rocky Mountain Power's 2020 General Rate Case, Docket No. 20-035-04 dated December 30, 2020. The Company is requesting an effective date of January 1, 2021. The Company submitted revised tariff pages along with a complete new tariff and tariff index sheet.

Discussion

The Division completed a review of the Compliance Filing comparing it to the Commission's Report and Order in Docket No. 20-035-04. The Division noted possible corrections to the Compliance Filing. Below is a summary of the Division's findings.

Original Sheet No. 2R.3 – #22 – “Multi-Family Home” added. Subsequent renumbering required.

Original Sheet No. 2R.4 - #33 – “Single Family Home” added. Subsequent renumbering required.

Original Sheet No. 8R.3 - #7a – “Paperless Bill Credit” added. The Company's proposed numbering is 7a. The Division does not believe Paperless Bill Credit is a subsection to number 7 on Sheet No. 8R.2 – Disputed Bill. Paperless Bill Credit should be renumbered to number 8 with subsequent renumbering.

Original Sheet No. 94.9 – “FERC 409.1 Income. Taxes, Utility Operating Income” added. The Division understands this addition is needed to include the Production Tax Credits (PTC) FERC/SAP account information in the tariff. Because PTCs are not the only entries in FERC 409.1 a distinction is required in the tariff to include only the PTCs. The Division recommends adding PTC to the title. ((SAP 570001 – Income Tax Exp – Federal – Electric – PTCs (Include).

In informal discussions with the Company, the Division reviewed the proposed corrections. The Company indicated it would review the Division's recommended corrections and provide corrected tariff sheets in reply comments.

Late on January 26, 2021, the Company filed an updated spreadsheet detailing the base Energy Balancing Account (EBA) along with various components, including production tax credit information. Due to the lateness of the filing, the Division has not finalized its review of the EBA components.

Conclusion

The Division reviewed the Tariff Compliance Filing and verified the tariff changes are consistent with the Commission's Report and Order with exception as noted above. The Division recommends the Commission approve the tariff changes with the recommended changes. In reply comments, the Division will make a final recommendation on the base EBA components.

Cc: Joelle Stewart, Rocky Mountain Power
Jana Saba, Rocky Mountain Power
Michele Beck, Office of Consumer Services