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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: The Public Service Commission of Utah
From: The Office of Consumer Services
Michele Beck, Director
Alex Ware, Utility Analyst
Date: March 31, 2021
Subject: Docket 21-035-T04: OCS Comments on RMP's Proposed Tariff Revisions
In the Matter of: Rocky Mountain Power's Proposed Tariff Revisions to Schedule 105, Irrigation Load Control Program

INTRODUCTION

On March 16, 2021, Rocky Mountain Power (RMP) filed proposed tariff revisions with the Public Service Commission (PSC) regarding its irrigation load control program of Schedule 105. On March 18, 2021, the PSC issued a Notice of Filing and Comment Period stating interested parties may submit comments and reply comments on RMP's proposed tariff changes by March 31, 2021 and April 7, 2021 respectively. The Office of Consumer Services (OCS) submits these comments to the PSC in response to that notice.

DISCUSSION

On March 3, 2021, RMP delivered a draft of its advice letter and proposed tariff changes in this docket to the OCS. As we are a consumer advocate for irrigation utility customers (as well as residential and small business customers), the OCS conducted a cursory review of the proposed changes. The OCS identified some concerns about the number of load interruption events per day and compensation levels, and we held discussions with RMP representatives regarding those issues. RMP agreed with the OCS's suggested edits to the proposed tariff changes, which

were included in the version of the proposed tariff changes RMP filed with the PSC on March 16, 2021.

RECOMMENDATION

We appreciate RMP representatives being receptive of our initial concerns which have now been satisfied. The OCS does not oppose the proposed tariff changes RMP filed with the PSC in this docket.

cc: Jana Saba, Rocky Mountain Power

Chris Parker, Division of Public Utilities