



State of Utah
Department of Commerce
Division of Public Utilities

FRANCINE GIANI
Executive Director

THOMAS BRADY
Deputy Director

CHRIS PARKER
Director, Division of Public Utilities

GARY HEBERT
Governor

SPENCER J. COX
Lieutenant Governor

ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Energy Section Manager

Date: November 25, 2013

Re: **Acknowledge RMP Stress Factor Study**

Docket No. 11-035-200, Rocky Mountain Power's General Rate Case.

RECOMMENDATION

The Division recommends acknowledgment of the Company's Stress Factor Study as meeting the requirements of the Commission's order in Docket No. 11-035-200.

ISSUE

On November 1, 2013, in compliance with a settlement stipulation ("Stipulation") in the above referenced docket, Rocky Mountain Power ("RMP") filed its Stress Factor Study ("Study") with the Public Service Commission. The Commission issued a Notice of Filing and Comment Period on November 5, 2013, allowing interested parties until December 5, 2013 an opportunity to comment on the Study. This memo constitutes the Division's comments at this time.

DISCUSSION

As part of the Stipulation in Docket No. 11-035-200, RMP agreed to propose and file a new Study indicating potential stresses on its system that might lead to the timing and type of resources necessary to meet its service obligations. Specifically, RMP agreed to:

1. Propose a plan for a new Study no later than July 1, 2013;
2. Request that the Commission hold a technical conference to allow parties an opportunity to make comments on the Company's proposed plan;
3. Distribute the proposed plan at least two weeks prior to the technical conference; and
4. Provide the completed study at least two months prior to filing its next general rate case.

RMP filed a proposed Study plan on July 1, 2013 and the Commission noticed and held a technical conference on August 14, 2013. RMP filed the completed study on November 1, 2013. On November 5, 2013, RMP filed a Notice of Intent to file a general rate case on or about January 3, 2014. Therefore, the Division concludes that RMP has met the requirements as required by the Stipulation for its Study.

Without implying any conclusions, the Division notes that the Study contains six sections, each reporting a measure purportedly measuring some aspect of stress on the PacifiCorp's system. The same study was provided in the multi-state process or MSP on inter-jurisdictional costs allocations. The Division is in the process of analyzing the information and anticipates offering technical comments both in RMP's future rate case and in the MSP at the appropriate times. Other parties are likely to do likewise. Therefore, in the absence of substantive comments from other parties, the Division recommends that the Commission take no further action at this time.

CONCLUSION

In compliance with the Stipulation, RMP filed its Study with the Commission on November 1, 2013. The Division has reviewed the Study and concludes that RMP has met its obligations under the Stipulation. The Division will, and other parties are likely to, file technical comments on the Study in RMP's next general rate case. Therefore, the Division recommends that the Commission acknowledge RMP's study as in compliance with the Commission's order.

CC David Taylor, Rocky Mountain Power
Michelle Beck, Office of Consumer Services
Service List