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**BEFORE THE UTAH PUBLIC SERVICE COMMISSION**

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**In the Matter of the Application of Rocky Mountain Power for Authority to Increase Its Proposed Electric Service Schedules and Electric service Regulations.**

Docket No. 11-035-200

**UIEC'S COMMENTS ON ROCKY MOUNTAIN POWER'S STRESS FACTOR STUDY**

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Pursuant to a Notice of Filing and Comment Period issued in this docket by the Commission on November 5, 2013, the Utah Industrial Energy Consumers ("UIEC") submit the following comments on the Stress Factor Study ("SFS") filed by Rocky Mountain Power ("RMP" or "Company") on November 1, 2013.

**COMMENTS**

1. As part of the Stipulation approved by the Commission in the last general rate case, the parties agreed that RMP would propose a plan for a SFS, and complete the SFS at least two months before filing its next general rate case. On July 1, 2013, the Company filed an outline of items that it proposed would comprise a "Stress Factor Study Plan." The Commission

scheduled a Technical Conference for August 14, 2013, to address the proposed Stress Factor Study Plan.

2. On or about August 8, 2013, in anticipation of the scheduled Technical Conference, the UIEC submitted comments on the proposed Stress Factor Study Plan (“UIEC Initial Comments”), which included comments by UIEC witnesses, Maurice Brubaker and Dr. Jonathan Lesser.

3. The UIEC Initial Comments noted that the intended purpose of the Stress Factor Study Plan was to look at whether the Company’s 12 CP, 75/25 demand/energy allocation of generation capacity costs to rate classes in Utah is appropriate and produces just and reasonable rates. The UIEC concluded that the factors proposed in the study were not helpful in that regard because they do not indicate what might amount to “stress” under any of the proposed studies, because they do not reflect market conditions and are not consistent with principles of economic efficiency, and because the study was not designed to evaluate the probability that the Company would be unable to serve its load under various contingencies.

4. RMP filed the results of the completed SFS on November 1, 2013. The SFS is apparently confined to the items identified in the Stress Factor Study Plan.

5. The Division of Public Utilities submitted its comments to the Company’s completed SFS on November 25, 2013, acknowledging the Company’s filing, but reserving technical comments until the appropriate time in the anticipated Utah general rate case or in the MSP docket (where the same report was also filed).

6. The UIEC agree with the Division that RMP has filed the results of the SFS with the Commission and served them on the parties. But, as discussed in the UIEC’s Initial

Comments, it does not appear that the SFS produces results that demonstrate “stress” in a way that is relevant to allocating capacity costs. If it is believed that factors other than system peak contribute to these costs, a well-designed loss of load probability study would be more likely to demonstrate the cost-causing events. In any case, the UIEC reiterate their view that capacity costs should be based on actual data, verified by a comparison to market conditions, and allocated based on each class’s actual contribution to causing the costs.

7. In anticipation that the SFS will become the subject of comments and testimony in the next Utah general rate case, the UIEC reserve further comment on the SFS until then. Likewise, the UIEC reserve comment on the proper allocation of transmission, distribution and other fixed costs, and on whether the SFS produces a useful measurement of system stress for the purpose of allocating costs.

DATED this 5th day of December, 2013.

/s William J. Evans  
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**CERTIFICATE OF SERVICE**

Docket No. 11-035-200

I hereby certify that on this 5th day of December 2013, I caused to be emailed, a true and correct copy of the foregoing **UIEC'S COMMENTS ON ROCKY MOUNTAIN POWER'S STRESS**

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