



GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

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
Danny A.C. Martinez, Utility Analyst
Cheryl Murray, Utility Analyst
Copies To: Rocky Mountain Power
Carol Hunter, Vice President, Services
Beau Brown, Regulatory Manager

Division of Public Utilities
Chris Parker, Director
Artie Powell, Energy Section Manager

Date: May 14, 2012

Subject: Docket No. 12-035-T05, Proposed Changes to Schedule 96A,
Dispatchable Irrigation Load Control Credit Rider Program and
Phase Out of the Schedule 96 Irrigation Load Control Credit Rider
Program

Background

Rocky Mountain Power (Company) filed with the Public Service Commission of Utah (Commission) its Proposed Changes to Schedule 96A, Dispatchable Irrigation Load Control Credit Rider Program and Phase Out of the Schedule 96 Irrigation Load Control Credit Rider (Program) on April 20, 2012. The Company informed the DSM Advisory Group about these modifications in its February 8, 2012 meeting. The Office of Consumer Services (Office) responded to the Company with preliminary questions and comments on April 6, 2012. The Company provided written responses to the Office's feedback and further discussed Schedule 96 and Schedule 96A modifications. The Office and the Company have been in further discussions after their modifications were filed with the Commission.

Discussion

In preliminary comments the Office questioned the term "Fixed *Monthly* Participation Credit" in Schedule 96. In the previous tariff, as well as on Schedule 96.4 Attachment A¹

¹ Attachment A is a section on Sheet No. 96.4 and was not included as part of the Company's filing.

the term "Fixed *Annual* Participation Credit was used. The Company confirmed that the language on Attachment A "Fixed Annual Participation Credit" was correct and that the language on Sheet No. 96.1 should be changed. In reviewing Attachment A, the Office noted additional language changes that should be made:

1. Attachment A referred to the 2007 Fixed Annual Participation Credit. The credit should reflect the current period, 2012. The Company indicated that the terms have not changed and the Participation Credit would be the same as previous years. The Office recommends that the Company replace 2007 with 2012 to reflect the current period.
2. Attachment A included the current irrigation season, May 25 through September 15. The proposed irrigation season, June 1 through August 31 cited in 96.1 differs from Attachment A. The Company can remove the dates in Attachment A since the irrigation period is defined in 96.1 or can add the proposed irrigation season dates in Attachment A for clarification. The Office supports either modification to clarify the irrigation season.

The Office has no additional concerns.

Lastly, the Office also met with the Utah Farm Bureau to discuss the proposed changes and determined that they do not object to the proposal. The Office suggests that in the future the Company communicate with the Utah Farm Bureau regularly. Such communication will help the Company directly determine if there are issues with the Program from the pumpers' perspective, provide information about proposed changes, and receive input regarding any potential concerns with those changes. Through regular contact with the Utah Farm Bureau the Company may garner broader support and possibly increased participation in the Program.

Recommendation

The Office recommends that the Commission approve the phase out of Schedule 96 and tariff modifications to Schedule 96A with the following modifications to Schedule 96.1 and 96.4, Attachment A:

1. Replace the "Fixed Monthly Participation Credit" with "Fixed Annual Participation Credit" in 96.1
2. Replace 2007 with 2012 in Attachment A in 96.4 to reflect current period.
3. Remove the dates in Attachment A since the irrigation period is defined in 96.1.