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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

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To: Public Service Commission of Utah
From: Office of Consumer Services
Michele Beck, Director
Cheryl Murray, Utility Analyst
Date: April 20, 2015
Subject: Comments of the Office of Consumer Service Regarding Rocky Mountain Power's Proposed Electric Service Schedule No. 32, Service from Renewable Energy Facilities Compliance Filing. Docket No. 14-035-T02

Background

On March 20, 2015 the Utah Public Service Commission (Commission) issued its Order approving Rocky Mountain Power's Schedule 32 tariff sheets (Order) as proposed and amended at the December 9, 2014 hearing with certain modifications. The Company was ordered to file revised tariff sheets for Electric Service Schedule 32 within 14 days of the date of the order reflecting the changes described therein. The Company was also required to "file revised tariff sheets for Electric Service Schedules 91, 94, 98, 193, and 195 containing surcharge/surcredit rates for Electric Service Schedule No. 32 within 30 days of the date of this order."¹

On April 3, 2015 the Company filed with the Commission revised tariff sheets as required by the Order and on that same date the Commission issued an Action Request to the Division of Public Utilities (Division) with a response due by April 20, 2015.

Discussion

In its March 20, 2015 Order approving Schedule 32 with certain modifications the Commission approved:

"an administrative fee of \$110 per month per generating source and \$150 per month for each delivery point; the Office of Consumer Services' proposal to apply various

¹ The Company filed revision to these tariff sheets to include Schedule 32 on April 3, 2015, prior to the 30 day deadline.

surcharges/credits to Schedule 32²; the Utah Association of Energy Users' proposed delivery charge; and PacifiCorp's proposed daily power charge.”

The following comments pertain to the various surcharges/credits that are to apply to Schedule 32.

Surcharges/Credits

Original Sheet No. 32.6 of the Schedule 32 tariff includes the following provision:

Surcharge Adjustments: All monthly bills shall be adjusted in accordance with Schedule 193.³

The Office notes that although the Commission ordered Schedule 32 customers are subject to various surcharges/credits⁴ only Schedule 193 is specifically identified on the Schedule 32 tariff sheets. However, Original Sheet No. 32.9, I A describing contracting procedures reads:

“Customer shall enter into a Renewable Energy Contract with the Company. The Company shall charge a Customer for all metered electric service delivered to the Customer according to the terms of the Renewable Energy Contract which *shall incorporate by reference the terms of this Schedule and the applicable general service schedule.*”
[emphasis added]

Although the Office is aware that general service customers are subject to surcharges/credits, upon review of the general service schedules applicable to potential Schedule 32 customers the Office found that all of those schedules also only include the surcharge adjustment for Schedule 193; no other surcharges or credits are identified.

The Office contacted the Company regarding the lack of listed surcharges and was told that the Company is aware of the situation and is in the process of working to correct/revise the accuracy of all schedules in question. The Company expects to make a “housekeeping” filing shortly.⁵

The Office supports the Company's expressed commitment to revise all relevant tariff sheets to more accurately reflect cost assignments associated with the surcharge schedules. The Office recommends that the Company maintain its plan to make a housekeeping filing in April but asserts the filing should be made no later than the end of May 2015.

² Those surcharges/credits include schedules: 91, 94, 98, 193 and 195.

³ Schedule 193 is the Demand Side Management (DSM) Cost Adjustment tariff.

⁴ See footnote 2.

⁵ In our discussion the Company indicated they expect to file these housekeeping changes in the next few weeks but a key Company person was at that time out of town which could delay the filing.

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Alternatively, in the interim the Commission could require the Company to immediately re-file Original Sheet No. 32.6 listing all surcharge adjustments that are applicable to Schedule 32 customers.

Housekeeping Correction for Schedule 32

Original Sheet No. 32.2 section 7 c reads in part:

“When electricity is delivered from a Renewable Energy Facility to multiple Customers. The specified percentage of each Renewable Energy Facility shall be contracted with each Customer.”

It appears to the Office that the period following “customers” should be removed and the second sentence should be a continuation of the first sentence.

Office Recommendation

The Office recommends that the Commission approve the Schedule 32 tariff with the condition that the Company includes a revised Schedule 32 tariff related to appropriate surcharges/credits with its other similar “housekeeping” tariffs filing no later than May 31, 2015.