



State of Utah
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Division of Public Utilities

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ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director
Artie Powell, Energy Section Manager
Charles E. Peterson, Technical Consultant

Date: April 20, 2015

Re: **Docket No. 14-035-T02 TARIFF COMPLIANCE FILING In the Matter of Rocky Mountain Power's Proposed Electric Service Schedule No. 32, Service from Renewable Energy Facilities**

RECOMMENDATION (Approve with Conditions)

After review of the tariff sheets filed in Docket No. 14-035-T02, the Division of Public Utilities (Division) recommends that the Public Service Commission of Utah (Commission) approve the tariff sheets with an effective date of April 1, 2015, with the following conditions. That PacifiCorp (Company) file on or about May 1, 2015 a request for agency action to correct certain details affecting several of its tariff schedules including Schedule 32, or alternatively file a corrected page 32.6 of the instant tariff schedule as an interim solution to the just-mentioned larger issue affecting several schedules.

ISSUE

Following the issuance of the Commission's Report and Order on March 20, 2015 (Order), the Company filed tariff sheets for Schedule 32 on April 3, 2015. On the same day, April 3, 2015, the Commission issued an Action Request to the Division to review the tariff sheets for

compliance and make recommendations by April 20, 2015. This memo is in response to the Commission's Action Request.

DISCUSSION

The Division has reviewed the tariff sheets and finds them to be in compliance with the Commission's Order in this matter with one exception.

On page 34, paragraph 4, the Commission ordered that Electric Service Schedules 91, 94, 98, 193, and 195 be updated to include the new Schedule 32.¹ In the Company's April 3, 2015 filing on page 32.6 under the paragraph heading "Surcharge Adjustments," refers only to Schedule 193. The Division contacted the Company to suggest that it revise Schedule 32.6 to conform more precisely to the Order by including references to Schedules 91, 94, 98, and 195 in addition to 193.² The Company has represented to the Division that it is aware of this incomplete reference in Schedule 32.6, but it is aware of similar issues in several other of its tariffs in Utah. For the sake of efficiency, the Company indicated to the Division that it wants to deal with this administrative "clean-up" of Schedule 32 and these other tariffs all at once in a filing that it intends to make with the Commission around the end of April 2015.

The Division understands that one aspect of this prospective late April or early May filing is that these tariff schedules will all refer to a new tariff schedule that the Company will propose to create. The creation of the new tariff schedule would presumably allow for easier updating of the Company's tariff schedules in the future.

At this point the Division believes that it is reasonable to hold off correcting Schedule 32.6 for a brief period awaiting this general clean-up proposed by the Company. This problem with Schedule 32.6 is not severe and other electric service schedules already approved by the Commission have similar problems. Therefore, the Division recommends approval of the

¹ The Order discusses the issue in footnote 15 on page 9.

² The Division understands that the Office of Consumer Services has similarly brought this issue to the Company's attention.

proposed Schedule 32 conditioned on the timely filing of either a corrected Schedule 32.6, or the filing by the Company requesting the Commission to allow the clean-up Schedule 32 and several other schedules.

CONCLUSION

The Division has reviewed the tariff and recommends approving the proposed Schedule No. 32, with the conditions described above.

CC Bob Lively, Rocky Mountain Power
Michele Beck, Office of Consumer Services
Service List