



State of Utah
Department of Commerce
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
Energy Section
Artie Powell, Manager
Abdinasir M. Abdulle, Utility Analyst
Charles Peterson, Technical Consultant
Date: December 23, 2015
Re: Docket No. 15-035-56 (03-035-14) – Rocky Mountain Power Quarterly Compliance Filing – 2015.Q3 Avoided Cost Input Changes

RECOMMENDATIONS (Acknowledge)

The Division of Public Utilities (“Division”) recommends that the Public Service Commission (“Commission”) acknowledge Rocky Mountain Power’s (“Company”) quarterly compliance filing – 2015.Q3 avoided cost input changes – as complying with the Commission Order in Docket No. 03-035-14.

ISSUE

On December 2, 2015, the Company filed its Quarterly Compliance Filing – 2015.Q3. This filing reports changes since the Company’s 2015.Q2 Quarterly Compliance filing dated August 10, 2015. On the same day, the Commission issued an Action Request to the Division requesting a review of the Company’s filing for compliance and to make recommendations. The Commission asked the Division to report back by January 4, 2016. On December 4, 2015, the Commission also issued a Notice of Filing in which it indicated that “any interested party must

submit comments within the time parameters established in the settlement agreement the Commission approved on June 9, 2015 in *In the Matter of Review of Electric Service Schedule No. 38, Qualifying Facilities Procedures, and Other Related Procedural Issues*, Docket No. 14-035-140 (“Settlement Agreement”). This memorandum represents the Division’s comments on the Company’s filing.

DISCUSSION

Based upon Commission Orders dated October 31, 2005 and February 2, 2006, in Docket No. 03-035-14, the Company is required to provide quarterly updates of its avoided cost indicative pricing, highlighting any changes made to the Proxy and GRID models that are used to calculate Schedule 38 avoided costs. Furthermore, the parties to the proceeding in Docket No, 14-035-140, stipulated and the Commission approved that the Company classify new and updated assumptions as either “Routine Updates” or “Non-Routine Updates”. In addition, it has been stipulated that “...parties will file a notice with the Commission within three weeks after the Company files its quarterly compliance filing, to identify which specific assumptions, if any, they intend to contest”.

In compliance with these Commission Orders, the Company filed with the Commission its quarterly report for the 2015.Q3 on December 2, 2015. The Division reviewed and checked the accuracy and reasonableness of the calculations in the Company’s filing. The Division believes that the Company properly documented the input changes to the avoided cost calculations.

The Division notes that the Company updated several inputs and assumptions to its model since the 2015.Q2 update filing. These updates are all categorized as routine updates. The routine updates serve to update the basic model inputs to keep the GRID model current. The specific routine updates that the Company made are listed in the cover letter of the Company’s filing. The Division agrees that these updates are correctly designated as routine. Based on our review, the Division concludes that the updates appear reasonable and are correctly incorporated into the avoided calculations.

CONCLUSION

Overall, the input changes made by the Company between this compliance filing and the 2015.Q2 filing *increases* avoided cost prices on a 20-year nominal levelized basis by approximately \$0.48 per MWh. This increase represents the cumulative impact of all the changes made by the Company. The incremental impact of each change from the prior step will depend on the order in which the changes are introduced into the model.

Based upon its review, the Division believes that the updates to the inputs of the avoided cost calculations are reasonable and the avoided cost prices are calculated according to the Commission approved methods. The Division also agrees that the updates are properly classified as routine. Therefore, the Division recommends that the Commission acknowledge the Company's filing as complying with the Commission Orders.

CC: Bob Lively, RMP
Michele Beck, OCS