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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: Public Service Commission

From: Office of Consumer Services
Michele Beck, Director
Cheryl Murray, Utility Analyst

Date: July 31, 2015

Subject: In the Matter of Rocky Mountain Power's 2015 Smart Grid Monitoring Report. Docket No. 15-035-63

On July 1, 2015, Rocky Mountain Power (Company) filed its 2015 Annual Smart Grid Monitoring Report (2015 Report), appendices and confidential Attachment A with the Utah Public Service Commission (Commission). The 2015 Report is filed in compliance with the Commission's November 30, 2011 order in Docket No. 08-999-05.

On July 6, 2015, the Commission issued a notice of filing and comment period allowing interested parties to submit comments on the Company's 2015 Report on or before Friday, July 31, 2015, and reply comments on or before Friday, August 14, 2015.

Division of Public Utilities' Comments and Recommendations

On July 29, 2015, the Division of Public Utilities (Division) filed comments recommending that the Commission not acknowledge the Company's 2015 Report due to a number of deficiencies that relate to the Commission's November 30, 2011 Order in Docket No. 08-999-05.

In addition the Division questions the "usefulness of continuing to have an annual report that says about the same thing each year". The Division offers several options for the Commission's consideration:

- 1) Discontinue requiring the Company file a report until such time as there are clear indications that the smart grid landscape has changed in a significant way.
- 2) Have the Company report every two or three years, instead of every year.

- 3) Have the Company report annually on the specific activities it is engage in with respect to smart grid and then include an in-depth discussion on technology that is on the horizon that the Company is particularly interest in.
- 4) Continue as we are.

Office Comments

The Office notes one area of the 2015 Report that is an improvement over the 2014 Report. The vast majority of the 2015 Report is provided as public information. Only Attachment A is marked as a confidential document as opposed to the 2014 Report where, from the Office's point of view, too much of the information was marked as confidential.¹

In our review of the 2015 Report the Office identified many of the same deficiencies outlined in the Division's July 29, 2015 comments. The Office had reached a similar conclusion that the 2015 Report should not be acknowledged by the Commission due to those deficiencies.

Regarding the Division's recommendation that the Commission "reconsider the need and usefulness of the Smart Grid report going forward", the Office concurs. It seems that little if any significant change to the Company's assessment of the business case for implementing Smart Grid is imminent. Therefore, the Office asserts that it is appropriate to consider the value received from the annual report versus the time and effort put forth in creating, reviewing and monitoring the report.

Recommendation

The Office recommends that the Commission not acknowledge Rocky Mountain Power's 2015 Smart Grid Monitoring Report.

CC: Chris Parker, Division of Public Utilities
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¹ For example in the 2014 Report the Table identifying Commission ordered Report Requirements was provided as part of the confidential information even though the order is a public document.