



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  
Justin Christensen, Utility Analyst

Date: August 29, 2016

Re: 16-035-19 In the Matter of RMP Fossil Fuel Energy Efficiency Standard Plan  
06-999-03. In the Matter of Consideration of the Amendment of 16 U.S.C.  
Section 2621

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### RECOMMENDATION (Discontinued)

The Division of Public Utilities (Division) recommends that the Commission discontinue the annual heat rate improvement plan (HRIP) as filed by Rocky Mountain Power (RMP). The report should be filed as an appendix in the IRP.

### ISSUE

On June 16, 2016 the Commission acknowledged the 2016 Fossil Fuel Heat Rate Improvement Plan. The Commission seeks comments on the value of the annual heat rate improvement plan and whether PacifiCorp's requirement to file an annual heat rate improvement plan should be modified or discontinued.

## **ANALYSIS**

The Company has been annually filing a HRIP report to the Commission. The last couple of years, the only comments have been made by the Division. The Division believes that the report itself is not used by other parties. The Division recommends that if the Commission believes the report has merit, that the report be included as part of an appendix to the IRP where it will be more available and noticed by more parties. The IRP currently provides information such as the Operating Characteristics of the Average Full Load Heat Rate of each plant. Including the HRIP report in the IRP will make it routinely available for review and place it in context of the IRP's various provisions.

## **CONCLUSION**

The Division recommends the Commission to have the Company discontinue filing the HRIP. The Division believes the report will be more effective as an appendix in the IRP.

CC: Bob Lively, RMP  
Michele Beck, OCS