



1407 W North Temple, Suite 330
Salt Lake City, Utah 84114

August 17, 2020

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

RE: Docket No. 16-035-36
In the Matter of the Application of Rocky Mountain Power to Implement
Programs Authorized by the Sustainable Transportation and Energy Plan Act
Reply Comments

In accordance with the Public Service Commission of Utah's request for comments issued May 6, 2020 in the above referenced proceeding, Rocky Mountain Power hereby submits its reply comments regarding the extension of the Sustainable Transportation and Energy Plan pilot program under Utah Code Annotated § 54-20-106.

Informal questions may be directed to Jana Saba at (801) 220-2823.

Sincerely,

Joelle Steward
Vice President, Regulation

Service List: Docket No. 16-035-36

John A. Hutchings (#14514)
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone: (801) 220-4545
Facsimile: (801) 220-3299
Email: john.hutchings@pacificorp.com

Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power to Implement Programs Authorized by the Sustainable Transportation and Energy Plan Act	Docket No. 16-035-36 ROCKY MOUNTAIN POWER'S REPLY COMMENTS
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I. INTRODUCTION

In accordance with the May 6, 2020 Request for Comments (“Request for Comments”) issued by the Public Service Commission of Utah (“Commission”) in the above referenced matter, Rocky Mountain Power (“the Company”) hereby submits for filing its reply comments regarding the extension of the Sustainable Transportation and Energy Plan (“STEP”) pilot program.

II. BACKGROUND

In March 2016, Utah enacted the STEP Act, now codified at Utah Code Ann. (“UCA”) §§ 54-7-12.8, 54-20-101, *et seq.* UCA 54-20-102(2) defined the pilot program period for a large scale electric utility as a period of five years beginning on January 1, 2017. Accordingly, the STEP pilot period of a large scale electric utility will end on December 31, 2021. The Company is the only large scale electric utility to which the STEP pilot program applies. UCA § 54-20-106, Extension of Pilot Program, requires the Public Service Commission of Utah (“Commission”) to submit a report and recommendation to the Utah State Legislature (“Legislature”) regarding whether the Legislature should, with respect to the STEP pilot program, “(1) extend the plan or a portion of

the plan as a rate payer funded program; (2) implement the plan or a portion of the plan as a state funded program; or (3) discontinue the plan or a portion of the plan.”

On July 15, 2020, the Company, the Division of Public Utilities, the Office of Consumer Services and Utah Association of Energy Users (“UAE”) filed comments in response to the Commission’s Request for Comments advising that the Commission recommend to the Legislature that the STEP pilot program be discontinued pursuant to option three above. In its comments, UAE further recommended that Company recover costs for ongoing operation of any STEP-related project that continues beyond 2021 only after a Commission determination that the project is cost effective and in the public interest. The Company’s reply comments respond to this recommendation by UAE.

III. COMPANY’S COMMENTS

The Company believes UAE’s comment regarding ongoing costs for STEP-related projects is outside the scope of the Commission’s Request for Comments and should not be considered in this context. The Commission’s Request for Comments was focused on whether the Commission should recommend to the Legislature to (1) extend the STEP pilot program; (2) implement the STEP pilot program or a portion thereof; or (3) discontinue the STEP pilot program or a portion thereof. The treatment of STEP-related projects that continue beyond the STEP pilot program, and how any ongoing costs for those projects are recovered, should be considered in a different proceeding noticed by the Commission allowing all interested parties to be involved from the outset, and not within the context of this Request for Comments from the Commission regarding the Commission’s recommendation to the Legislature whether to continue the STEP pilot program or a portion thereof.

III. CONCLUSION

The Company respectfully requests that the Commission not consider UAE's comments regarding the treatment of STEP-related projects in this Request for Comments.

DATED this 17th day of August, 2020.

Respectfully submitted,

ROCKY MOUNTAIN POWER

/s/

John A. Hutchings
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone: (801) 220-4545
Facsimile: (801) 220-3299
Email: john.hutchings@pacificorp.com

Attorney for Rocky Mountain Power

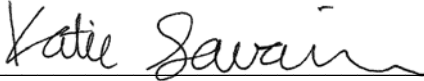
CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2020, a true and correct copy of the foregoing was served by electronic mail on the following:

OFFICE OF CONSUMER SERVICES	
Michele Beck (C) 160 East 300 South, 2nd Floor Salt Lake City, Utah 84111 mbeck@utah.gov	
UTAH DIVISION OF PUBLIC UTILITIES	
Madison Galt (C) 160 East 300 South, 4 th Floor Salt Lake City, UT 84111 mgalt@utah.gov	
ASSISTANT UTAH ATTORNEYS GENERAL	
Patricia Schmid (C) Assistant Attorney General 500 Heber Wells Building 160 East 300 South Salt Lake City, UT 84111 pschmid@utah.gov	Justin Jetter (C) Assistant Attorney General 500 Heber Wells Building 160 East 300 South Salt Lake City, UT 84111 jjetter@agutah.gov
Robert Moore (C) Assistant Attorney General 500 Heber Wells Building 160 East 300 South Salt Lake City, UT 84111 rmoore@utah.gov	Victor Copeland (C) Assistant Attorney General 500 Heber Wells Building 160 East 300 South Salt Lake City, UT 84111 vcopeland@agutah.gov
WESTERN RESOURCE ADVOCATES	
Sophie Hayes (C) Western Resource Advocates 307 West 200 South, Suite 2000 Salt Lake City UT 84101 sophie.hayes@westernresources.org	Nancy Kelly (C) Western Resource Advocates 9463 N. Swallow Rd. Pocatello, ID 83201 nkelly@westernresources.org

UTAH CLEAN ENERGY	
<p>Hunter Holman (C) Utah Clean Energy 1014 2nd Avenue Salt Lake City, UT 84111 801-363-4046 hunter@utahcleanenergy.org</p>	<p>Kate Bowman (C) Utah Clean Energy 1014 2nd Avenue Salt Lake City, UT 84111 801-363-4046 kate@utahcleanenergy.org</p>
SIERRA CLUB	
<p>Gloria Smith (C) Managing Attorney Sierra Club Environmental Law Program 2101 Webster Street, Suite 1300 Oakland, CA 94612 (415) 977-5532 gloria.smith@sierraclub.org</p>	<p>Joseph Halso (C) Associate Attorney Sierra Club Environmental Law Program 50 F Street NW, 8th Floor Washington, DC 20001 (202) 650-6080 joe.halso@sierraclub.org</p>
UTAH ASSOCIATION OF ENERGY USERS	
<p>Gary A. Dodge HATCH, JAMES & DODGE 10 West Broadway, Suite 400 Salt Lake City, UT 84101 Telephone: 801.363.6363 Facsimile: 801.363.6666 gdodge@hjdllaw.com</p>	<p>Phillip J. Russell HATCH, JAMES & DODGE 10 West Broadway, Suite 400 Salt Lake City, UT 84101 Telephone: 801.363.6363 Facsimile: 801.363.6666 prussell@hjdllaw.com</p>
<p>Kevin Higgins Energy Strategies 215 S. State Street, #200 Salt Lake City, UT 84111 Telephone: 801-355-4365 Facsimile: 801-521-9142 khiggins@energystrat.com</p>	<p>Neal Townsend Energy Strategies 215 S. State Street, #200 Salt Lake City, UT 84111 Telephone: 801-355-4365 Facsimile: 801-521-9142 ntownsend@energystrat.com</p>
SALT LAKE CITY CORPORATION	
<p>Megan J. DePaulis SALT LAKE CITY ATTORNEY'S OFFICE 451 S State St, Suite 505A Salt Lake City, UT 84111 megan.depaulis@slcgov.com</p>	<p>Tyler Poulson SALT LAKE CITY CORPORATION 451 S State St, Suite 148 Salt Lake City, UT 84111 tyler.poulson@slcgov.com</p>

CHARGEPOINT, INC.	
Stephen F. Mecham Stephen F. Mecham Law, PLLC 10 West 100 South, Suite 323 Salt Lake City, Utah 84101 sfmecham@gmail.com	
ROCKY MOUNTAIN POWER	
Jana Saba 1407 W North Temple, Suite 330 Salt Lake City, UT 84114 jana.saba@pacificorp.com utahdockets@pacificorp.com datarequest@pacificorp.com	



Katie Savarin
Coordinator, Regulatory Operations