



State of Utah

Department of Commerce Division of Public Utilities

CHRIS PARKER
Executive Director

ARTIE POWELL
Director, Division of Public Utilities

GARY HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Artie Powell, Director

Doug Wheelwright, Utility Technical Consultant Supervisor

Bob Davis, Utility Technical Consultant

Date: December 4, 2020

Re: **Docket No. 17-035-61, Approve Tariff Sheets, Revisions to Schedule 137 -**
Application of Rocky Mountain Power to Establish Export Credits for Customer
Generated Electricity. Compliance.

Recommendation (Approve Tariff Sheets)

The Division of Public Utilities (“Division”) recommends the Public Service Commission of Utah (“Commission”) approve Rocky Mountain Power’s (“RMP”) revisions to Schedule No. 137, Net Billing Service, with an effective date of October 30, 2020.

Issue

On December 2, 2020, RMP filed with the Commission its revisions to Electric Service Schedule No. 137, Net Billing Service. RMP requested an effective date of October 30, 2020. On December 2, 2020, the Commission issued an action request to the Division requesting it to review RMP’s filing for compliance and make recommendations. The Commission asked the Division to report back as soon as possible. This memorandum represents the Division’s response to the Commission’s request.

Background and Discussion

On November 25, 2020, the Commission issued its Order Approving Tariff Revisions with Corrections (“Order”) in Docket No. 17-035-61.¹ The Commission’s Order approved RMP’s tariff revisions to Schedule Nos. 136 and 137 with an additional revision to Schedule 137.3 to indicate that export credits will be applied against the power and energy charges on customer’s monthly bill.² RMP’s compliance filing in response to the Commission’s Order revises Schedule No. 137.3, Special Conditions Section 3, to read (with emphasis added for convenience):

From-

3. The credit value in dollars computed for the Exported Customer-Generated Energy will be applied against the **Energy Charges** on the Customer’s monthly bill. Excess credits will carry-over to the next monthly bill during the Annualized Billing Period.

To-

3. The credit value in dollars computed for the Exported Customer-Generated Energy will be applied against the **Power and Energy Charges** on the Customer’s monthly bill. Excess credits will carry-over to the next monthly bill during the Annualized Billing Period.

In review of RMP’s advice letter for this matter, the Division reviewed Utah Administrative Code Rule 746- 405-2(D)(3)(g). RMP states that the tariff sheets proposed do not constitute a violation of state law or Commission rule and the Division concludes that the filing does not appear to violate statute or rule.

Conclusion

The Division concludes that RMP’s December 2, 2020 filing correctly incorporates the revisions pursuant to the Commission’s Order. The Division concludes that RMP’s proposed tariff sheets are just and reasonable and in the public interest. The Division has reviewed RMP’s filing and

¹ See Commission’s Order Approving Tariff Revisions with Correction, Docket No. 17-035-61, November 25, 2020, <https://pscdocs.utah.gov/electric/17docs/1703561/3165821703561oatrcw11-25-2020.pdf>.

² *Id.*, pg. 3.

recommends the Commission approve RMP's revisions to Schedule No. 137.3, Net Billing Service. RMP requests an effective date of October 30, 2020.

Cc: Joelle Steward, RMP
Jana Saba, RMP
Emily Wegener, RMP
Michele Beck, OCS