



State of Utah  
Department of Commerce  
Division of Public Utilities

MARGARET W. BUSSE  
*Executive Director*

CHRIS PARKER  
*Director, Division of Public Utilities*

SPENCER J COX  
*Governor*

DEIDRE HENDERSON  
*Lieutenant Governor*

## Action Request Response

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities  
Chris Parker, Director  
Artie Powell, Manager  
Doug Wheelwright, Utility Technical Consultant Supervisor  
Bob Davis, Utility Technical Consultant

**Date:** April 30, 2021

**Re:** Approve Tariff Sheets, Revisions to Schedule 137, Docket No. 17-035-61 –  
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 May 1, 2021.

### Issue

On April 29, 2021, RMP filed with the Commission its revisions to Electric Service Schedule No. 137.3, Net Billing Service. RMP requested an effective date of May 1, 2021. Also on April 29, 2021, 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.

## **Background and Discussion**

On April 28, 2021, the Commission issued its Order on Agency Rehearing (Order) in Docket No. 17-035-61.<sup>1</sup> The Commission revised its calculations for the summer and winter export credit rates (ECR) using its updated carrying charges for avoided generation and distribution capacity costs and updated capacity contribution for avoided generation, transmission, and distribution capacity costs. The revised ECR rates for summer and winter are 5.817¢/kWh and 5.487¢/kWh, respectively. The summer rate is comprised of 2.439¢/kWh of energy and 3.378¢/kWh of total capacity. The winter rate is comprised of 2.109¢/kWh of energy and 3.378¢/kWh of total capacity. The total capacity rate is comprised of 2.252¢/kWh of avoided generation, 0.876¢/kWh of avoided transmission, and 0.249¢/kWh of avoided distribution for both summer and winter rates. These values are based on a 7.82 percent carrying charge for avoided generation and 7.91 percent carrying charge for avoided distribution. The Commission applied a 21.99 percent capacity contribution to the avoided generation, transmission, and distribution.<sup>2</sup> The Commission did not revise its avoided energy rates from its October 30, 2020 Order.<sup>3</sup>

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 has reviewed RMP's filing and concludes that its April 29, 2021 filing correctly incorporates the revisions pursuant to the Commission's Agency Rehearing Order. The Division concludes that RMP's proposed tariff sheets are just and reasonable and in the public interest and therefore recommends the Commission approve RMP's revisions to Schedule No. 137.3, Net Billing Service, with an effective date of May 1, 2021.

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<sup>1</sup> See Commission's Order on Agency Rehearing, Docket No. 17-035-61, April 28, 2021, <https://pscdocs.utah.gov/electric/17docs/1703561/3184591703561o0ar4-28-2021.pdf>.

<sup>2</sup> *Id.*, page 13.

<sup>3</sup> See Commission's Order, Docket No. 17-035-61, October 30, 2020, page 1, <https://pscdocs.utah.gov/electric/17docs/1703561/3161911703561o10-30-2020.pdf>.

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