



GARY HERBERT
Governor
SPENCER J. COX
Lieutenant Governor

State of Utah
Department of Commerce
Division of Public Utilities

FRANCINE GIANI
Executive Director

THOMAS BRADY
Deputy Director

CHRIS PARKER
Director, Division of Public Utilities

Action Request Response

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director
Artie Powell, Energy Section Manager
Abdinasir Abdulle, Utility Analyst
Bob Davis, Utility Analyst

Date: January 5, 2018

Re: **Docket No. 17-035-T15**. Rocky Mountain Power's Proposed Housekeeping Tariff Revisions.

RECOMMENDATION - (APPROVAL)

The Division of Public Utilities (Division) recommends the Utah Public Service Commission (Commission) approve Rocky Mountain Power's (Company) proposed tariff changes (Filing) for the following tariff schedules:

- Sheet No. 2E.3, (Residential Service Electric Vehicle Time of Use Pilot Option-Temporary);
- Sheet No. 31.1, (Partial Requirements Service - Large Generation Service - 1,000 kW and Over);
- Sheet No. 32.2, (Service from Renewable Energy Facilities);
- Sheet No. 73.4, (Subscriber Solar Program Rider Optional);
- Sheet No. 121.1 and Sheet No. 121.2, (Plug-in Electric Vehicle Load Research Study Program - Temporary); and
- Sheet No. 135.1, (Net Metering Service).

The Division has reviewed the Company's Filing and determined that its proposed tariff sheet revisions accurately reflect the customer generator changes and should be approved.

ISSUE

On December 21, 2017, the Company filed its tariff revisions with the Commission. The Filing consists of a cover letter, edited sheets, and clean sheets for the tariff sheets mentioned above. On the same day, the Commission issued an action request to the Division to investigate the Company's filing and make recommendations. The Company proposes an effective date of January 22, 2018 for the revisions. The Commission requested that the Division complete its review by January 5, 2018.

DISCUSSION

The Company states in its cover letter that the housekeeping revisions to Schedules 2E, 31, 32, 73 and 121 are needed to exclude co-participation of those programs with the new Transition Program for Customer Generators under Schedule No. 136. It is the intention of these tariff changes to exclude customer generators (Schedule 135 or Schedule 136) from participating in any of these programs. Schedule No. 135, Net Metering Service, was the only program for customer generators at the time these other schedules were approved. The Division understands these revisions are necessary and does not oppose.

The Company's proposed change to Schedule No. 135 is to add further language suggested by the Office of Consumer Services.¹ The change reflects more detail in the definition of Annualized Billing Period. The revised language differentiates irrigation customers on Electric Service Schedule 10, whose Annualized Billing Period ends after the regularly scheduled meter reading in October, to other customers whose Annualized Billing Period ends after the regularly scheduled meter reading in March. The Division does not oppose the revision.

The Division notes that the Company makes an affirmative statement in its cover letter that "the proposed tariff sheets do not constitute a violation of state law or Commission rule" per R746-405-2(D). In addition to requiring an explicit affirmation, the rule states that, "The filing of proposed tariff sheets shall of itself constitute the representation of the filing utility that it, in good faith, believes the proposed sheets or revised sheets to be consistent with applicable statutes, rules and orders."

CONCLUSION

The Division concludes that the Company's Filing is necessary and accurately addresses the proposed changes to the tariff sheets mentioned above and recommends approval.

CC: Joelle Steward, RMP
Jana Saba, RMP
Michele Beck, OCS

¹ Office of Consumer Services, Docket No. 14-035-114, November 8, 2017, at p. 2, ¶ 2.