



State of Utah
Department of Commerce
Division of Public Utilities

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COMMENTS

To: Utah Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
Artie Powell, Energy Section Manager
Bob Davis, Utility Technical Consultant

Date: June 12, 2019

Re: Comments with Recommendation, Docket No. 18-035-39, – Investigation Re:
Expiring Excess Generation Credits under Schedule 135.

RECOMMENDATION

The Division of Public Utilities (“Division”) previously filed comments and reply comments in this docket with the Public Service Commission of Utah (“Commission”). The Division has reviewed Rocky Mountain Power’s (“RMP”) May 29, 2019, Compliance Filing, and concludes it follows the Commission’s January 11, 2019 Order (“Order”). The Division concludes RMP’s recommendation to apply the difference of \$1,352 in expired excess credits to Electric Service Schedule No. 91, Surcharge to Fund Low Income Residential Lifeline Program, to be reasonable. Therefore, the Division recommends the Commission approve RMP’s recommendation.

ISSUE

In its Order, the Utah Commission ordered RMP to:

1. Provide a one-time disbursement of \$159,840 allocated to each PacifiCorp customer qualifying for HELP based on the number of customers currently receiving service on Electric Service Schedule No. 3 during the April 2019 billing cycle;
2. Report on the number of customers and the amount of the one-time distribution no later than 30 days following the end of the April 2019 billing cycle; and,
3. File any necessary tariff changes to effectuate the Order.

In compliance with the Order, on February 1, 2019, RMP filed proposed changes to Sheet No. 3.2 of Electric Service Schedule No. 3, Low Income Lifeline Program – Residential Service Optional for Qualifying Customers (Schedule No. 3) to effectuate the one-time credit. The Commission approved the changes on February 14, 2019, effective April 1, 2019. In the Tariff Compliance Filing, RMP estimated the credit to be \$6.80 per customer, calculated as the one-time credit of \$159,840 dispersed to 23,508 customers, which was RMP’s estimate of the number of customers that would be taking service under Schedule No. 3 in April 2019.

RMP submits this compliance filing to report on the actual number of customers and the total amount of the one-time distribution.

DISCUSSION

RMP forecast the number of customers in April 2019 to be 23,508, and an Excess Credit Balance of \$159,840. This resulted in a per-customer benefit of \$6.80 (\$159,840 divided by 23,508). The actual April 2019 billing cycle resulted in 23,307 credits totaling \$158,488 (23,307 times \$6.80) issued to Schedule No. 3 customers. This represents a difference between the amount credited and the amount in the Order of \$1,352.

The Division concludes the resulting difference in the actual rate of \$6.858 (\$159,840 divided by 23,307) and the forecast \$6.80 is negligible when allocating the \$1,352 difference to 23,307 customers.

RMP recommends the difference be applied to the balancing account associated with its Electric Service Schedule No. 91 – Surcharge to Fund Low Income Residential Lifeline Program, which is the current disposition method for the application of the avoided cost value of unused excess generation credits under Electric Service Schedule 135 – Net Metering Service. The Division supports RMP’s recommendation.

CONCLUSION

The Division reviewed Rocky Mountain Power’s May 29, 2019, Compliance Filing, and concludes it follows the Commission’s January 11, 2019 Order. RMP forecast the April 2019 customers on the HELP program to be 23,508. The actual customer count was 23,307 resulting in a slightly different credit per HELP customer on Schedule No. 3. The Division concludes

RMP's recommendation to apply the difference of \$1,352 in expired excess credits to Electric Service Schedule No. 91, Surcharge to Fund Low Income Residential Lifeline Program, to be reasonable. Therefore, the Division recommends the Commission approve RMP's recommendation.

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