

July 22, 2019

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. 19-035-17
Rocky Mountain Power's Second Annual Sustainable Transportation and Energy Plan Act ("STEP") Program Status Report
Reply Comments

On April 30, 2019, Rocky Mountain Power ("Company") filed its second annual Sustainable Transportation and Energy Plan Act ("STEP") program status report ("Report"). On April 30, 2019 the Public Service Commission of Utah ("Commission") issued an Action Request to the Division of Public Utilities ("Division") due May 30, 2019, which was subsequently extended to July 3, 2019 at the Division's request. On July 3, 2019, comments were submitted by Division and the Office of Consumer Services ("Office"). On July 8, 2019, the Commission issued a Notice of Comment Period providing an opportunity for interested parties to submit a response to the Division's and Office's comments ("Notice"). Consistent with the Notice, the Company submits the following reply comments.

Response to the Division's Comments

The Division states that it reviewed the Report and concludes the Company followed the reporting requirements, including the additional reporting requirements related to the First Annual STEP Report in Docket No. 18-035-16 ("First STEP Report") and the February 6, 2019 Commission order in Docket No. 16-035-36. The Division recommends the Commission acknowledge the Report with the recommendation that the Company refile Page 1.0 – STEP and USIP Accounting Summary to include the updates made to Table 4 in the 2019 annual Utah Solar Incentive Program ("USIP") report in Docket No. 19-035-25. The Company agrees to this recommendation and an updated Page 1.0 to the Report is provided as Exhibit A. The updated Page 1.0 in Exhibit A has also been modified to include a change recommended by the Office as described below.

Response to the Office's Comments

The Office makes several recommendations with regards to the Report.

1. Page 1.0 STEP and USIP Accounting Summary

The Office requests that the Company clarify that the amount shown on Page 1.0 on the row labeled STEP Account Beginning Balance and corresponding column labeled 2017-2018 (\$15,850,031) is the 2017 beginning STEP account balance. The Company has added a footnote to the revised Page 1.0 included as Exhibit A to clarify what this number represents.

2. Commercial Line Extension Pilot Program

The Office requested four clarifying revisions be made to the commercial line extension pilot program section of the Report, which begins on Page 11.0.

- a. Specify the number of applications submitted in a manner that is easier to identify;
- b. Provide additional detail to clarify if any recipient received multiple incentive awards;
- c. Reverse the column headings on the last two columns of Table 2 on Page 11.1.
- d. Clearly label the column on Table 2 that provides the information regarding number of conduit extensions installed for future EV charging locations.

With regard to recommendation (a) all of the applications listed are the total number of applications submitted. In response to recommendation (b), all of the applications included in the table are for non-contiguous projects and from different entities.

The Office requested that the Company provide an updated Table 2 with the applicable revisions. Below is a revised Table 2 that incorporates the Office's recommendations (c) and (d). With regards to the Office's recommendation (c), the column headings are not in error but to provide more clarity the Company revised the labels (denoted in red) to address the Office's concerns.

Individual Project Details – Table 2									
	Status (paid or committed)	Approved Date	Gross Project Cost	Internal Backbone Cost	STEP 20% Incentive	Number of lots in Development	Parking installed (Y or N)	Number of charging locations (Conduit Extensions)	Number of PV individual charging stations
1	Paid in 2018	7/7/2017	\$ 38,253	\$ 36,611	\$ 7,322	7	Y	1	TBD
2	Paid in 2018	9/18/2017	\$ 40,069	\$ 37,606	\$ 7,521	5	N	--	--
2017 Total					\$14,843				
3	Paid in 2018	1/16/2018	\$ 43,685	\$ 39,783	\$ 7,957	7	Y	1	TBD
4	Paid in 2018	3/14/2018	\$ 102,804	\$ 102,670	\$20,534	7	Y	1	TBD
5	Committed	3/19/2018	\$ 80,183	\$ 80,183	\$16,037	9	N	--	--
6	Paid in 2018	3/20/2018	\$ 102,360	\$ 100,714	\$20,143	3	Y	1	TBD
7	Committed	3/29/2018	\$ 25,141	\$ 24,218	\$ 4,844	5	N	--	--
8	Committed	5/29/2018	\$ 68,720	\$ 30,669	\$ 6,134	6	N	--	--
9	Paid in 2018	7/13/2018	\$ 30,957	\$ 29,315	\$ 5,863	4	Y	2	TBD
10	Committed	7/26/2018	\$ 58,410	\$ 58,410	\$11,682	1	Y	1	TBD
11	Committed	11/1/2018	\$ 52,789	\$ 13,035	\$ 2,607	5	Y	1	TBD
12	Committed	11/7/2018	\$ 37,081	\$ 33,803	\$ 6,761	6	N	--	--
13	Committed	11/12/2018	\$ 19,192	\$ 19,192	\$ 3,838	8	Y	1	TBD
14	Committed	12/6/2018	\$ 248,411	\$ 118,107	\$23,621	1	N	--	--
2018 Total					\$130,020				

The Company appreciates the opportunity to file reply comments and looks forward to continual engagement with the parties in implementation of STEP.

Sincerely,

Joelle Steward
Vice President, Regulation

CC: Service List - Docket No. 19-035-17

Exhibit A

2018 Annual STEP Status Report
STEP and USIP Accounting
CY 2018
Revised July 22, 2019

Page No.	CY 2017	CY 2018												CY 2018 Total	2017-2018 Cumulative Total*	
		Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18			
	STEP Account Beginning Balance	(15,850,031)	(19,861,068)	(19,974,549)	(20,104,232)	(20,267,263)	(19,489,532)	(19,857,589)	(20,743,638)	(21,329,864)	(22,066,387)	(22,618,166)	(23,219,539)	(23,499,515)	(19,861,068)	(15,850,031)
	Spending by Project:															
2.0	EV Charge Infrastructure	487,502	29,303	96,194	63,785	494,558	129,900	78,886	432,161	138,221	196,348	58,301	96,300	67,746	1,881,703	2,369,205
3.0	Woody-waste Co-Fire Biomass at Hunter Unit 3	-	-	-	-	69,024	-	(6,000)	-	19,425	-	77,112	-	70,716	230,277	230,277
4.0	NOx Neural Network Implementation	457,767	(9,232)	35,332	17,082	-	13,050	(26,101)	52,202	(13,053)	58,891	47,152	-	32,292	207,616	665,383
5.0	Alternative NOx Reduction	131,405	7,000	-	3,500	24,500	-	(8,990)	-	-	-	-	-	-	26,010	167,415
6.0	CO2 Enhanced Coal Bed Methane (CO2 Reduction)	-	19,250	8,250	2,750	24,750	-	-	27,500	-	-	2,750	8,779	-	94,029	94,029
7.0	Cryogenic Carbon Capture (Emerging CO2 Capture)	160,451	-	211,316	-	-	75,724	-	-	218,008	-	-	25,241	-	530,289	690,740
8.0	CARBONsafe (CO2 Sequestration Site Characterization)	150,239	-	-	-	-	-	-	-	-	-	-	-	-	-	150,239
9.0	Solar Thermal Assessment (Grid Performance)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10.0	Circuit Performance Meters (Substation Metering)	13,676	1,191	906	-	12,237	79,026	13,767	4,062	3,522	67,599	150,364	44,598	50,076	427,349	441,025
11.0	Commercial Line Extension	-	-	-	-	-	43,334	-	-	-	-	-	26,006	-	69,340	69,340
12.0	Gadsby Emissions Curtailment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13.0	Panguitch Solar and Energy Storage Project	331,995	39,181	5,825	5,688	6,182	25,512	31,897	-	37,607	16,978	(74,373)	(19,073)	51	75,474	407,470
14.0	Microgrid Project	-	-	400	448	89,246	90	-	-	351	179	-	-	-	90,713	90,713
15.0	Smart Inverter Project	-	-	1,203	254,193	114,895	4,645	2,163	1,074	1,868	358	358	806	2,297	383,859	383,859
16.0	Utah Solar Incentive Program	4,762,182	919,754	610,471	273,503	422,453	60,974	10,560	147,515	149,876	266,814	101,229	279,064	244,597	3,468,611	8,248,993
	Total Spending	6,495,218	1,006,448	969,897	620,948	1,257,846	432,254	96,182	664,514	555,824	607,167	285,781	538,833	467,775	7,503,469	13,998,686
	Surcharge Collections	(9,756,984)	(1,050,014)	(1,027,088)	(712,970)	(410,018)	(738,745)	(913,238)	(1,179,070)	(1,218,428)	(1,082,835)	(809,079)	(739,237)	(845,240)	(10,725,962)	(20,482,947)
	Ending Monthly Balance before Carrying Charge	(19,111,798)	(19,904,633)	(20,031,741)	(20,196,254)	(19,419,435)	(19,796,022)	(20,674,646)	(21,258,194)	(21,992,467)	(22,542,055)	(23,141,465)	(23,419,942)	(23,876,980)	(23,083,562)	(22,334,292)
	Carrying Charge	(749,270)	(69,916)	(72,491)	(71,009)	(70,096)	(61,567)	(68,993)	(71,669)	(73,920)	(76,111)	(78,073)	(79,573)	(80,843)	(874,261)	(1,623,531)
	Ending Monthly Balance	(19,861,068)	(19,974,549)	(20,104,232)	(20,267,263)	(19,489,532)	(19,857,589)	(20,743,638)	(21,329,864)	(22,066,387)	(22,618,166)	(23,219,539)	(23,499,515)	(23,957,822)	(23,957,822)	(23,957,822)

*the STEP Account Beginning Balance of (\$15,850,031) is the beginning balance as of January 2017

CERTIFICATE OF SERVICE

Docket No. 19-035-17

I hereby certify that on July 22, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

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