

Hunter Holman Utah Bar No. (15165)  
Utah Clean Energy  
1014 2<sup>nd</sup> Ave.  
Salt Lake City, UT 84103  
(801) 363-4046  
hunter@utahcleanenergy.org  
*Attorney for Utah Clean Energy*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

---

<b>In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations</b>	PHASE II – UCE’S COST OF SERVICE REBUTTAL DOCKET No. 20-035-04
--	--

---

**PREFILED REBUTTAL TESTIMONY OF SARAH WRIGHT**

ON BEHALF OF

**UTAH CLEAN ENERGY**

**OCTOBER 16, 2020**

## TABLE OF CONTENTS

<b>I.</b>	<b>INTRODUCTION</b>	<b>3</b>
<b>II.</b>	<b>PROPOSED REVISIONS TO SCHEDULE 6A</b>	<b>3</b>
<b>III.</b>	<b>ADVANCED METERING INFRASTRUCTURE</b>	<b>7</b>
<b>IV.</b>	<b>INCLINING BLOCK RATES</b>	<b>10</b>
<b>V.</b>	<b>SCHEDULE 32</b>	<b>12</b>
<b>VI.</b>	<b>RECOMMENDATIONS</b>	<b>17</b>

1           **I. INTRODUCTION**

2   **Q. Please state your name and business address.**

3   A. My name is Sarah Wright. My business address is 1014 2nd Avenue, Salt Lake City, Utah  
4       84103.

5   **Q. What is the purpose of your rebuttal testimony?**

6   A. The purpose of my rebuttal testimony is to respond to recommendations provided by  
7       parties including the Utah Association of Energy Users, Western Resource Advocates,  
8       ChargePoint, the Office of Consumer Services, and the University of Utah. Specifically, my  
9       rebuttal testimony addresses proposed revisions to Schedule 6A, the Company’s plans to  
10      implement Advanced Metering Infrastructure (AMI), the elimination of the third tier  
11      inclining block rate for residential customers, and changes to Schedule 32.

12           **II. PROPOSED REVISIONS TO SCHEDULE 6A**

13 **Q. What has the Utah Association of Energy Users proposed regarding revisions to**  
14 **Schedule 6A?**

15 A. The Utah Association of Energy Users (“UAE”) addresses Rocky Mountain Power’s  
16      (“RMP” or “Company”) proposal to eliminate Schedule 6B, and recommends that the  
17      Public Service Commission (“Commission”) allow customers who are already on Schedule  
18      6B to remain on that schedule.<sup>1</sup>

19 **Q. Have you taken a position on the Company’s proposal to eliminate Schedule 6B?**

20 A. No, I have not provided a recommendation regarding Schedule 6B. This schedule is  
21      currently closed to new customers, and the Company has proposed to move the 16  
22      customers who currently take service under Schedule 6B to either Schedule 6 or 6A.

---

<sup>1</sup> Docket No. 20-035-04, Direct Testimony of Mr. Justin Bieber for Utah Association of Energy Users, Sept. 15 2020, lines 103 – 110.

23 According to Mr. Bieber, at least one of these customers invested in a battery storage  
24 system specifically for cost savings premised on the use of Schedule 6B. I have not taken a  
25 position for or against discontinuing Schedule 6B, but it is reasonable to allow customers  
26 who made significant and recent investments in energy infrastructure premised on the use  
27 of Schedule 6B to remain on that schedule.

28 **Q. If the Company were to maintain Schedule 6B for use by customers who are currently**  
29 **enrolled on that schedule, how do you recommend the proposed changes to Schedule**  
30 **6A be enacted?**

31 A. We recommend that RMP's proposed Schedule 6A could be enacted as Schedule 6C, in  
32 order to preserve both the current 6A (as I have recommended) and Schedule 6B (as UAE  
33 has recommended). Preserving the existing Schedule 6A and creating a new Schedule 6C  
34 will result in more options for customers and may also accelerate the migration of the 16  
35 customers who remain on the legacy Schedule 6B.

36 **Q. What does ChargePoint propose regarding Schedule 6A?**

37 A. ChargePoint supports the Company's revisions to Schedule 6A, but recommends that the  
38 Company modify the TOU time periods "to more appropriately reflect the Company's  
39 wholesale costs and to provide a more actionable price signal."<sup>2</sup> ChargePoint recommends  
40 that the Company modernize the TOU time periods for Schedule 6A by creating shorter  
41 morning and evening peak periods, as it has proposed to do for Schedules 8 and 9.  
42 Specifically, ChargePoint proposes that the Company adopt the TOU time periods used in  
43 Oregon's Schedule 29, which is pending Oregon Public Utilities Commission approval.  
44 The Schedule 29 time periods include on-peak periods of 6 am to 10 am and 5 pm to 8 pm

---

<sup>2</sup> Docket No. 20-035-04, Direct Testimony of Ms. Ann Smart for ChargePoint, Sept. 15 2020, lines 98 – 99.

45 from Monday to Friday (excluding holidays) in the winter months of November through  
46 March, and 4 pm to 8 pm Monday through Friday (excluding holidays) in the summer  
47 months of April through October. As a second alternative, ChargePoint recommends use of  
48 the TOU time periods developed for Schedule 8.

49 **Q. How do you respond to ChargePoint’s proposal to adjust the on-peak and off-peak**  
50 **periods for the Company’s proposed revised Schedule 6A?**

51 A. I have not evaluated the specific TOU on-peak and of-peak windows that ChargePoint has  
52 proposed, but I agree that narrower and more targeted on-peak windows are more likely to  
53 result in desired shifts in customer energy use behavior. In the Company’s direct testimony,  
54 Mr. Meredith notes that “[m]odernizing the time periods for large non-residential customers  
55 to prioritize a shorter on-peak window where the middle of the day is off-peak has many  
56 benefits for the Company and its customers. With a shorter on-peak period, conservation  
57 and load shifting can be more targeted to the most stressful times for the grid.”<sup>3</sup>

58 **Q. Is there other evidence that a shorter on-peak period is more effective at driving**  
59 **customer behavior?**

60 A. Yes. The Regulatory Assistance Project’s “Smart Rate Design for a Smart Future” finds that  
61 “Concentrating peak-related charges into as few hours as possible produces a better  
62 customer response.”<sup>4</sup>

63 **Q. How does the length of the on-peak period relate to likely use of the revised Schedule**  
64 **6A for EV charging?**

---

<sup>3</sup> Docket No. 20-035-04, Direct Testimony of Mr. Robert Meredith, direct testimony, lines 764 – 768.

<sup>4</sup> Lazar, J. & Gonzalez, W. (July 2015). Smart Rate Design for a Smart Future. The Regulatory Assistance Project. <https://www.raponline.org/wp-content/uploads/2016/05/rap-lazar-gonzalez-smart-rate-design-july2015.pdf>.

65 A. The Company has explained that revisions to Schedule 6A are warranted because they are  
66 beneficial for “customers with very low load factors,” potentially including “some types of  
67 processes with sporadic loads, such as direct current electric vehicle fast charging and arc  
68 welding” who might otherwise experience very high charges per kilowatt-hour.”<sup>5</sup> Certain  
69 types of EV charging customers are unlikely to be sensitive to a 16 hour on-peak time  
70 window, as the Company has proposed for the revised Schedule 6A. A 16 hour on-peak  
71 period may be sufficient to motivate an EV owner to charge their car at home at night,  
72 rather than at work during the day. However, DC fast chargers are designed to charge a  
73 vehicle’s battery to 80% in 20 to 30 minutes and often sited in locations where they are  
74 intended for use by EV drivers who are making long distance trips. Customers using a DC  
75 fast charger are less likely to be willing to wait for on-peak pricing to end to charge their  
76 vehicle. Long on-peak periods may discourage sites from hosting DC fast chargers, which  
77 are essential to build a robust charging network necessary to enable wider use of electric  
78 vehicles.

79 **Q. What does Western Resource Advocates propose regarding the changes to Schedule**  
80 **6A?**

81 A. Western Resource Advocates (“WRA”) has also proposed that the Company implement the  
82 proposed revisions to Schedule 6A as a new rate and keep the current Schedule 6A  
83 available to “keep optionality in rate design in order to support this burgeoning industry.”<sup>6</sup>  
84 WRA also proposes that Schedule 6 tariffs include a “special condition” to avoid excessive  
85 rate switching, based on the special conditions from Schedules 2 and 2E. These rate

---

<sup>5</sup> Docket No. 20-035-04. Direct Testimony of Mr. Robert Meredith for the DPU, Sept. 15 2020, lines 794 – 796.

<sup>6</sup> Docket No. 20-035-04. Direct Testimony of Mr. Aaron Kressig for WRA, Sept. 15 2020, lines 83 - 84.

86 schedules specify that customers who switch to them must remain on that rate for at least  
87 one year.

88 **Q. How do you respond?**

89 A. I agree that it is reasonable to require Schedule 6 customers who change rates to remain on  
90 that rate for one year to discourage excessive rate switching.

91 **Q. Mr. Kressig of Western Resource Advocates has also proposed that the Commission**  
92 **require PacifiCorp to bring forth a specific commercial EV rate design by no later**  
93 **than Jan 1, 2023. How do you respond?**

94 A. Although the Company's proposed revisions to Schedule 6A are intended to serve certain  
95 Schedule 6 customers who might otherwise experience high per-kilowatt-hour charges  
96 from EV charging, the Company does not currently offer a commercial rate design  
97 specifically for commercial EV charging. A study of PG&E and Southern California Edison  
98 found that the growth of electric vehicles puts downward pressure on electric rates,  
99 especially if EVs charge using rates that reward off-peak charging.<sup>7</sup> As adoption of electric  
100 vehicles grows, it is appropriate to develop a specific rate designed to encourage EV  
101 charging in a way that maximizes grid benefits. I support WRA's recommendation to  
102 require the Company to bring forth an EV-specific rate design by January 1, 2023,  
103 including two stakeholder meetings to gather feedback in developing the rate.

104 **III. ADVANCED METERING INFRASTRUCTURE**

---

<sup>7</sup> Frost, J., Whited, M., & Allison, Avi. (June 2020). Electric Vehicles are Driving Electric Rates Down. Synapse Energy Economics, Inc. [https://www.synapse-energy.com/sites/default/files/EV\\_Impacts\\_June\\_2020\\_18-122.pdf](https://www.synapse-energy.com/sites/default/files/EV_Impacts_June_2020_18-122.pdf).

105 **Q. What is the Office of Consumer Services’ position regarding the Company’s proposal**  
106 **to include the cost of transitioning many customers to Advanced Metering**  
107 **Infrastructure in rates?**

108 A. The Office of Consumer Services (“Office”) opposes the Company’s AMI project for  
109 several reasons, one of which is a concern that, “by narrowly focusing the AMI project on  
110 meter reading savings, RMP is foregoing any discussion or development of a  
111 comprehensive and transparent grid modernization strategy that better leverages demand-  
112 side resources, allows the utility and third-parties to provide new energy services, and  
113 improves load flexibility.”<sup>8</sup>

114 **Q. How do you respond?**

115 A. I generally agree with the Office’s perspective regarding the goals and purposes of  
116 investment in AMI technology, and I agree that deployment of AMI technology should be  
117 coupled with a clear plan to use AMI in conjunction with advanced rate designs to drive  
118 smarter energy usage, leverage demand-site resources, and generally improve grid  
119 flexibility and customer service.

120 **Q. Is deployment of AMI alone enough to deliver benefits to customers?**

121 A. No. AMI offers additional functionality that can be used to enable the implementation of  
122 advanced rate designs, but purchasing AMI will not automatically deliver the benefits of  
123 advanced rate designs to customers. I am concerned by the Office’s finding that, “the AMI  
124 project will not allow RMP to implement advanced rate designs, nor do they have a plan or  
125 timeline for doing so,” in part because the Company has not updated its customer service

---

<sup>8</sup> Docket No. 20-035-04, Direct Testimony of Mr. Ron Nelson for OCS, Sept. 15 2020, lines 155 – 160.



126 system.<sup>9</sup> If the Company makes the significant upfront investment in AMI, it is also critical  
127 that the Company makes needed updates to its customer service system and presents a clear  
128 and coherent plan for ensuring that customers ultimately realize the benefits of the AMI  
129 meters they are paying for.

130 **Q. What do you recommend?**

131 A. I support several of the Office’s recommendations related to investments in AMI.  
132 Specifically, I agree with the Office’s recommendation that the PSC “direct RMP to  
133 develop a succinct Advanced Rate Design Roadmap that describes how and when RMP  
134 will leverage the technological capabilities of advanced meters to create beneficial rate  
135 structures that serve both customer and grid needs.”<sup>10</sup>

136 I also agree with the Office’s assertion that customers should have “functional, secure  
137 access to new data-enabled technologies to help them save energy and money, and  
138 otherwise realize value from an AMI deployment,”<sup>11</sup> and I support the five  
139 recommendations Mr. Nelson enumerates thereafter, which are that the PSC require RMP  
140 to:

- 141 1. Provide consumers easy access to the best available information about their  
142 energy usage.
- 143 2. Provide customers and authorized third parties with access to historic billing  
144 information in a machine-readable, automated manner.
- 145 3. Provide consumers and third parties with rate information in standardized,  
146 machine-readable formats.
- 147 4. The customer authorization process should be easy for consumers to use and  
148 require the least number of steps.
- 149 5. Provide a set of open data access standards that would create the ability for third  
150 parties to access sets of customer energy use data, either aggregated or  
151 anonymized.<sup>12</sup>

---

<sup>9</sup> *Id.* at lines 2029 – 2030.

<sup>10</sup> *Id.* at lines 2045 – 2048.

<sup>11</sup> *Id.* at lines 2178 – 2180.

<sup>12</sup> *Id.* at lines 2182 – 2193.

152 Last, I support the Office’s recommendation that the PSC consider a demand response  
153 target or requirement concurrent with approval of AMI.<sup>13</sup> This suite of recommendations  
154 will ensure that the rollout of new AMI technology occurs in conjunction with the  
155 implementation of a clear plan for enabling the functionality of AMI in a way that delivers  
156 measurable benefits to customers. I further recommend that the PSC direct the Company to  
157 convene a workshop with stakeholders in order to investigate and identify an appropriate  
158 demand response target. If the Commission chooses to approve the Company’s AMI  
159 project, approval should be contingent on a requirement that the Company develop a plan  
160 for meeting the Office’s recommendations.

161 **Q. Do you have any additional recommendations?**

162 A. Yes, in addition to the recommendations of the Office, the Company’s plan should evaluate  
163 strategies for Conservation Voltage Reduction and Volt/VAR optimization using AMI.

164 **IV. INCLINING BLOCK RATES**

165 **Q. The Company has proposed to eliminate the third tier of electricity prices for high**  
166 **usage residential customers. How have other parties responded to this proposal?**

167 A. The Office opposes elimination of the third tier for residential customers, and asserts that it  
168 is in the public interest to maintain tiered energy rates in order to provide some level of  
169 price signal to consumers until the inclining block rates can be replaced by TOU rates.<sup>14</sup>

170 WRA supports elimination of the third tier, but only if the Company is required to proposed  
171 a new TOU rate as the default at the next rate case. WRA further recommends that the PSC

---

<sup>13</sup> *Id.* at lines 2419 – 2426.

<sup>14</sup> Docket No. 20-035-045, Direct Testimony of Ms. Alyson Anderson for the OCS, Sept. 15 2020, lines 220 – 223.

172 direct the Company to work with stakeholders to evaluate TOU rates and best practices for  
173 transitioning.<sup>15</sup>

174 **Q. How do you respond?**

175 A. It is a longstanding position of Utah Clean Energy that rates should be designed to support  
176 energy efficiency and energy conservation. Tiered electricity prices, also known as  
177 inclining block rates, are an important tool for sending customers price signals to  
178 encourage energy conservation. I am concerned that the Company proposes to eliminate the  
179 third tier for residential customers without a plan to replace inclining block rates with  
180 another rate structure that sends customers a similar price signal. I agree that it is  
181 appropriate to consider implementing TOU rates for residential customers, and I support  
182 elimination of the third pricing tier if it is contingent on the creation of a new proceeding to  
183 explore TOU rates in the near future.

184 **Q. Why is it appropriate to initiate a new proceeding to develop residential TOU rates?**

185 A. Advancing technology is enabling the development of advanced rate structures, like TOU  
186 rates, that can be used to provide customers with more precise signals about the temporal  
187 value of energy. When TOU rates are implemented correctly, they can help customers to  
188 make behavior changes that help reduce grid costs. However, if TOU rates are not  
189 accompanied with careful attention to best practices and customer communication, they can  
190 also be confusing to customers and ineffective. A proceeding to develop TOU rates will  
191 encourage stakeholder involvement to ensure that the final TOU rate design reflects best  
192 practices, includes consideration of stakeholder concerns, and is aligned with other changes  
193 to utility practices. As I have already discussed, development of TOU rates is one way to

---

<sup>15</sup> Docket 20-035-04, Direct Testimony of Mr. Douglas Howe for WRA, Sept. 15 2020, lines 41 – 45.

194 enable customers to realize the benefits offered by AMI, and this proceeding could be a  
195 component of the Advanced Rate Design Roadmap which the Office recommends the  
196 Company be required to develop.

197 **V. SCHEDULE 32**

198 **Q. What is the purpose of your rebuttal testimony related to Schedule 32?**

199 A. The purpose of my rebuttal testimony related to Schedule 32 is to respond to  
200 recommendations made by UAE and the University of Utah (“University”). UAE and the  
201 University have both recommended that the PSC decline to adopt RMP’s proposed changes  
202 to the Delivery Facilities Charge (“Facilities” charge) and Daily Power Charge (“Power”  
203 charge). Both parties additionally describe alternative methods for calculating these charges  
204 that are more reasonable and less discriminatory.

205 **Q. How does the Company propose to calculate Facilities and Power for Schedule 32**  
206 **customers?**

207 A. Rocky Mountain Power’s direct testimony included a short paragraph explaining a change  
208 to the calculation method for Schedule 32 customer costs. According to Mr. Meredith, the  
209 Company first prepared a cost of service analysis for Schedule 32, to comply with the  
210 PSC’s Order in Docket 14-035-T02.<sup>16</sup> Then, the Company:

211 “[C]alculated proposed Delivery Facilities Charges for Schedule 32 based  
212 upon the cost of fixed demand-related transmission, distribution substations,  
213 distributions poles and conductor, and distribution transformers allocated to  
214 full requirement customers. The Company then set Daily Power Charges at a  
215 level that, in combination with the Delivery Facilities Charges, would recover

---

<sup>16</sup> Docket No. 20-035-04, Direct Testimony of Mr. Robert Meredith for RMP, May 8 2020, lines 949 – 951.

216 the same level of cost as Facilities and Power Charges that are applicable to  
217 full requirements customers.”<sup>17</sup>

218 **Q. Did the Company perform a cost of service analysis specifically for Schedule 32**  
219 **customers, as directed in the Commission’s order in Docket No. 14-035-T02?**

220 A. No, it appears they did not. Both UAE and the University of Utah note that the Company  
221 did not actually perform a cost of service study for Schedule 32 customers. Indeed, the PSC  
222 did “direct PacifiCorp to perform a cost of service analysis on Schedule 32 in all future  
223 general rate cases and incorporate these results in future GRC COS studies.”<sup>18</sup> However, in  
224 lines 192 – 197 of Mr. Meredith’s direct testimony, he says “[c]ost of service results were  
225 not calculated for these categories of customers, which include... Schedule 32.”

226 **Q. Does the Company provide an explanation as to why they have deviated from the**  
227 **Commission-approved method for calculating the Facilities charges for Schedule 32**  
228 **customers?**

229 A. No. The Company appears to have simply calculated the Facilities using the methodology  
230 that it proposed in Docket 14-035-T02, which was not selected by the Commission.

231 **Q. How do UAE and the University respond to the Company’s proposed changes to the**  
232 **Delivery Facilities charge?**

233 A. UAE finds that RMP is understating the forecasted billing units used to compute the  
234 Facilities charge for Schedule 32 customers. The billing units used to determine the  
235 Facilities Charge should be very close to the billing units used to determine the Class Non  
236 Coincident Peak for Schedules 6, 8, and 9, but UAE finds that the billing units for Schedule

---

<sup>17</sup> *Id.* at 951 – 957.

<sup>18</sup> Docket 14-035-T02, Commission Order on March 20, 2015, page 27.

237 32 customers do not align with the billing units used to determine costs for their  
238 counterparts in Schedules 6, 8, and 9. The result is a rate that over-recovers the intended  
239 level of costs from schedule 32 customers.<sup>19</sup>The University draws a similar conclusion,  
240 noting that under RMP’s proposal, Schedule 32 customers would not pay the same amount  
241 for Facilities and Power charges that full service customers pay, i.e., customers taking  
242 service under Schedules 6, 8, or 9.<sup>20</sup>

243 **Q. What do UAE and the University recommend?**

244 A. UAE recommends that Facilities and Power charges be adjusted to recover the same level  
245 of cost as the charges that are applicable to corresponding Schedule 6, 8, and 9 customers.<sup>21</sup>  
246 The University’s proposal is very similar—that the Facilities charge should be set  
247 consistent with the method used in the 2014 docket,<sup>22</sup> and the combined Facilities and  
248 Power charges should be calculated in such a way that results in Schedule 32 customers  
249 paying the same for Facilities and Power charges as their full service counterparts.<sup>23</sup>

250 **Q. Was UCE involved in the development of the Schedule 32 tariff in Docket No. 14-035-**  
251 **T02?**

252 A. Yes, I filed direct, rebuttal, and surrebuttal testimony in Docket No. 14-035-T02 and Utah  
253 Clean Energy filed a Post-Hearing Brief.

254 **Q. Did the PSC establish goals in the 2014 docket?**

255 A. Yes, In the Commission’s March 20, 2015 Order in docket 14-035-T02, it said:

---

<sup>19</sup> Docket No. 20-035-04, Direct Testimony of Mr. Justin Bieber for UCE, Sept 15 2020, lines 321 – 322.

<sup>20</sup> Docket No. 20-035-04, Direct Testimony of Mr. Christopher Benson for the U of U, Sept. 15 2020, lines 367-371.

<sup>21</sup> Docket No. 20-035-04, Direct Testimony of Mr. Justin Bieber for UCE, Sept 15 2020, lines 363-367.

<sup>22</sup> Docket No. 20-035-04, Direct Testimony of Mr. Christopher Benson for the U of U, Sept. 15 2020, lines 295-296.

<sup>23</sup> *Id.* at lines 381-387.

256 In support of our statutory mandate to ensure rates are just, reasonable, and in  
257 the public interest, care must be taken to set Schedule 32 rates that, to the  
258 extent feasible, avoid unintended consequences and economic distortion of  
259 choices, reflect consistent treatment for similarly situated customers, are  
260 relatively stable and predictable, and ensure the rate schedule does not  
261 impose or shift costs to other rate schedules.<sup>24</sup>

262 The Commission went on to identify a Schedule 32 charge that did not force  
263 Schedule 32 customers to pay “a different effective rate than their full services  
264 counterparts [under Schedules 6, 8, and 9].”<sup>25</sup> The Commission clearly intended for  
265 the charges in Schedule 32 to be aligned with those under Schedules 6, 8, and 9, and  
266 for RMP to, in the Company’s own words, “recover the same level of cost as  
267 Facilities and Power Charges that are applicable to full requirements customers.”<sup>26</sup>

268 **Q. Please summarize UCE’s position in Docket 14-035-T02.**

269 A. UCE supported the methodology for calculating the delivery Facilities charge proposed by  
270 UAE and subsequently approved by the Commission. That methodology relied on use of  
271 “the final demand rates and billing units approved by the Commission in the 2014 General  
272 Rate Case Settlement Stipulation, adjusted by the ratio of the sum of the transmission and  
273 distribution unit costs to the total demand-related unit costs identified in the Cost of Service  
274 Study.”<sup>27</sup> The Commission’s order also notes that, “PacifiCorp states that while the two

---

<sup>24</sup> *Id.* at 26.

<sup>25</sup> Docket 14-035-T02, Commission order on March 20, 2015, page 28.

<sup>26</sup> Docket No. 20-035-04, Direct Testimony of Mr. Robert Meredith for RMP, May 8 2020, lines 956-957.

<sup>27</sup> Docket 14-035-T02, Commission order on March 20, 2015, page 27.

275 approaches produce slightly different rates, either approach is reasonable and conceptually  
276 sound.”<sup>28</sup>

277 **Q. How do UAE and the University’s proposals align with the goals that the PSC and**  
278 **RMP established in the 2014 docket?**

279 A. UAE’s and the University’s proposals are far more consistent with the goals established by  
280 the Commission in the 2014 docket relative to RMP’s proposal. In Mr. Bieber’s direct  
281 testimony he notes that RMP’s highest proposed increase for charges for Schedule 6, 8, and  
282 9 customers is 5.2%.<sup>29</sup> In contrast, RMP’s *lowest* proposed increase for charges for  
283 Schedule 32 customers is 16.8%, going all the way up to 38.1%.<sup>30</sup> A brief look at the  
284 difference in costs under RMP’s proposal between Schedule 32 customers and their full  
285 service counterparts shows that RMP’s proposal is far from aligning these customer costs,  
286 and clearly discriminates against Schedule 32 customers.

287 **Q. What is your recommendation regarding proposed changes to Schedule 32?**

288 A. RMP did not perform a cost of service study for Schedule 32 customers, its proposal clearly  
289 increases costs for Schedule 32 customers beyond what Schedule 6, 8, and 9 customers are  
290 expected to pay, and as such, RMP’s proposal is far more discriminatory against Schedule  
291 32 customers than either UAE’s or the University’s proposals. The PSC should set the  
292 Facility and Power costs for Schedule 32 customers in such a way that is aligned with  
293 corresponding Schedule 6, 8, and 9 customers, and I support either UAE’s or the  
294 University’s recommended methodologies. Either of these proposals will provide a more  
295 just and reasonable rate under Schedule 32 than RMP’s proposal.

---

<sup>28</sup> *Id.*

<sup>29</sup> Docket No. 20-035-04, Direct Testimony of Mr. Justin Bieber for UAE, Sept. 15 2020, table JDB-4, lines 328-332.

<sup>30</sup> *Id.*



296           **VI. RECOMMENDATIONS**

297   **Q. Please summarize your recommendations.**

298   A. I recommend that the Commission take the following actions:

- 299       • I recommend that the Commission retain the current Schedules 6A and 6B (6B will  
300           continue to be closed to new customers, but will remain available for current Schedule  
301           6B customers) and add in Rocky Mountain Power’s proposed Schedule 6A as the new  
302           Schedule 6C;
- 303       • I recommend that the Commission adopt ChargePoint’s shorter TOU periods based on  
304           Oregon’s Schedule 29 for the proposed Schedule 6A (Schedule 6C under our proposal),  
305           or in the alternative, the TOU periods developed for Schedule 8 in Utah;
- 306       • I recommend that the Commission adopt WRA’s special conditions for the proposed  
307           Schedule 6A (Schedule 6C under our proposal);
- 308       • Consistent with WRA’s recommendation, I recommend that the Commission create a  
309           separate proceeding to develop an EV-specific rate design by January 1, 2023;
- 310       • I recommend that the Commission accept the Office’s recommendations related to AMI  
311           discussed above, and also request that the Commission direct RMP to convene a  
312           stakeholder workshop to collaboratively develop a demand response target or  
313           requirement;
- 314       • Related to the issue of AMI, in addition to the recommendations of the Office, the  
315           Company’s plan should evaluate strategies for Conservation Voltage Reduction and  
316           Volt/VAR optimization using AMI;
- 317       • I recommend that the Commission not approve elimination of the 3<sup>rd</sup> rate block for  
318           residential customers unless it is replaced by an equivalent signal encouraging energy

319 conservation, or approval is contingent upon the creation of a new proceeding intended to  
320 explore an implement TOU rates in the near future; and

321 • Finally, I recommend that the Commission use either UAE's or the University's proposal  
322 for calculating Facilities and Power costs for Schedule 32 customers.

323 **Q. Does that conclude your testimony?**

324 A. Yes.