

Sophie Hayes (12546)
Western Resource Advocates
307 West 200 South, Ste 2000
Salt Lake City, Utah 84101
Telephone No. (801) 212-9419
Email: sophie.hayes@westernresources.org

Steven S. Michel
Western Resource Advocates
409 E. Palace Avenue, Unit 2
Santa Fe NM 87501
Telephone No. (505) 820-1590
Email: smichel@westernresources.org

Attorneys for Western Resource Advocates

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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	Docket No. 20-035-04
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PREFILED SURREBUTTAL TESTIMONY OF

DOUGLAS J. HOWE

ON BEHALF OF

WESTERN RESOURCE ADVOCATES

November 6, 2020

1 **Q: Please state your name, position, and business address.**

2 A: My name is Douglas J. Howe. I am an energy policy analyst and am testifying on behalf
3 of Western Resource Advocates (WRA). My business address is 624 E. Alameda St.,
4 Unit 16, Santa Fe, New Mexico 87501.

5 **Q: Are you the same Douglas J. Howe who provided direct and rebuttal testimony (on**
6 **Phase II issues) on behalf of Western Resource Advocates?**

7 A: Yes.

8 **Q: Please summarize your surrebuttal testimony.**

9 A: The purpose of this surrebuttal testimony is to respond Company witness Robert
10 Meredith's recommendation to create "an inclusive stakeholder process" to develop "a
11 robust plan for future rate design offerings."¹ WRA supports the creation of such a
12 workgroup, and I provide recommendations for such a process.

13 **Q: Please review your recommendations in this case.**

14 A: My primary recommendation was that the Commission require the Company to develop a
15 time of use rate as the default rate for residential customers and establish a flat, seasonal
16 rate as an "opt-in" rate at its next general rate case. However, in recognition of the fact
17 that the AMI Project and/or the Company's customer service system (CSS) may not be
18 able to accommodate time of use rates by the time of the next general rate case, I
19 recommended that the Company have a plan in place by the next rate case for

¹ Meredith Rebuttal Testimony, 62: 1282-1286.

20 implementing a default time of use rate.² In rebuttal testimony, I supported OCS Witness
21 Ron Nelson's recommendation for the Company to develop an Advanced Metering Rate
22 Design Road Map.³

23 **Q: Do you have any further recommendations based on the rebuttal testimony filed by**
24 **parties on October 16, 2020?**

25 A: Yes. I have some additional recommendations based on Robert Meredith's
26 recommendation to create a collaborative rate design working group, in lieu of
27 independently developing an Advanced Metering Rate Design Road Map, which have
28 been informed by discovery responses from the Company.

29 **Q: What is your response to the Company's recommendation to create a collaborative**
30 **process for developing and evaluating future rate design offerings?**

31 A: I support the creation of a working group. I recommend that the Commission direct the
32 Company and stakeholders to address some specific issues as part of this working group
33 process. In making these recommendations, I do not intend to limit the scope of the
34 stakeholder process; rather, I include these recommendations to facilitate additional
35 scoping.

² Howe Direct Testimony, 15: 230-244.

³ Howe Rebuttal Testimony, 5: 61-66.

36 **Q: What issues do you recommend the working group address as part of its**
37 **investigation of more advanced rate designs?**

38 A: First, I recommend the stakeholder working group evaluate the necessary investments for
39 deploying advanced rate designs and establish a timeline and implementation strategy for
40 making such investments. Based on discovery responses, it is clear that the installation of
41 AMI meters, along with the field area network that remotely collects hourly meter data
42 from AMR meters, will not allow the Company to deploy time of use rates, at least until
43 the customer service system (CSS) is upgraded.⁴ As I indicated in my rebuttal testimony,
44 the Company needs to articulate a plan for maximizing customer and grid value from this
45 investment, consistent with the recommendations of OCS Witness Ron Nelson.⁵ In
46 furtherance of this effort, I recommend that the working group develop a timeline and
47 implementation strategy for upgrading the customer service system and deploying
48 advanced rate designs.

49 Second, the working group should develop advanced rates and programs, including
50 demand response programs, with considerations for low-income customer participation.

51 Third, I recommend the working group develop a plan for data sharing practices and a
52 proposal for open data access standards in order to take advantage of and maximize
53 customer and grid benefits of AMI.

54 Fourth, I recommend the working group develop a plan for how AMI and the associated
55 communication network will be integrated into the Company's distribution system

⁴ See WRA Exhibit DJH-1(SRT) (containing WRA data request set 10 and OCS data request set 18); *see also* Mansfield Direct Testimony, 24:510-518.

⁵ Nelson Direct Testimony, 104-114:2034-2222.

56 planning process and grid operations, taking into consideration benefits such as load
57 forecasting, distributed energy resource interconnection, hosting capacity analysis, non-
58 wires solutions, voltage management, and outage management.

59 **Q: Does this conclude your rebuttal testimony?**

60 **A:** Yes, it does.