

February 16, 2021

VIA ELECTRONIC FILING

Public Service Commission of Utah Heber M. Wells Building, 4th Floor 160 East 300 South Salt Lake City, UT 84114

Attention: Gary Widerburg

Commission Administrator

Re: Docket No. 20-035-04

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

RMP Comments on Collaborative Stakeholder Process

In accordance with the Public Service Commission of Utah's ("Commission") December 30, 2020 Order in Rocky Mountain Power's 2020 general rate case, Docket No. 20-035-04, PacifiCorp ("Company") submits these comments on the scope and format of a Collaborative Stakeholder Process. The Company appreciates the opportunity to file comments in this matter.

Potential Scope of the Process/Ownership of the Process

The Company recommends the Division of Public Utilities ("DPU") coordinate and provide agendas for each collaborative meeting. The Company recommends the meetings be held every other month and include the opportunity for volunteers to present on a pre-determined topic and/or invite a speaker to present at the meetings. The Company provides the following examples of topics:

- o Retail rate unbundling
- Generation, transmission and distribution cost of service allocation/classification methodologies
- Residential and non-residential rate designs for advance meter infrastructure
- o Conjunctive billing/options for large customers

Please refer to the Company's appendix to these comments for an example schedule of sessions by topic. The Company recommends allotting time in each agenda to allow for follow-up on the prior session's topic(s).

Further, the Company recommends that the topics adopted for the Collaborative Stakeholder Process focus on pricing and cost of service issues, not expand the Company to other topics such as load control programs or customer service improvements not related to pricing.

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Whether the process should involve a PSC docket or be more informal and reporting requirements

The Company recommends allowing for an informal process with a final report to be filed with the Commission by the DPU in Docket No. 20-035-04, in conjunction with participants, to present the findings and recommendations. The presentations from the meetings could be included as an appendix to the final report. If consensus is achieved on particular cost of service /rate design principles through the collaborative process, a settlement could also be filed in a future proceeding at that time.

Informal inquiries may be directed to Jana Saba, Manager, State Regulatory Affairs, at (801) 220-2823.

Sincerely,

Joelle Steward

Vice President, Regulation

Enclosures

Appendix. Example Schedule for Pricing and Cost of Service Collaborative Stakeholder Process

June 2021 - Retail Rate Unbundling

August 2021 - G&T COS allocation/classification methodologies Session 1

October 2021 - Residential rate designs that would use AMI

December 2021 - Distribution COS allocation/classification methodologies Session 1

February 2022 - Non-residential rate designs that would use AMI

April 2022 - G&T COS allocation/classification methodologies Session 2

June 2022 - Conjunctive Billing/ Options for Large Customers

August 2022 - Distribution COS allocation/classification methodologies Session 2

October 2022 - Discussion on Additional Pricing Topics if needed

December 2022 - Discussion on Additional COS Topics if needed

February 2023 – Final Report Due

CERTIFICATE OF SERVICE

Docket No. 20-035-04

I hereby certify that on February 16, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

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