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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

<p>In the Matter of the Application of Rocky Mountain Power for Approval 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</p>	<p>Docket No. 20-035-04</p> <p><b>REPLY COMMENTS OF WESTERN RESOURCE ADVOCATES ON COLLABORATIVE STAKEHOLDER PROCESS</b></p>
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**I. INTRODUCTION**

With these brief reply comments, WRA addresses certain recommendations raised by other parties, but does not replicate here the specific recommendations contained in our initial comments. Many of the initial recommendations submitted by parties seem generally compatible with each other (though differ in specifics and process recommendations), and WRA’s recommendations do not appear to directly conflict with any other party’s recommendations.

In our initial comments, WRA recommended two specific priorities for the stakeholder collaborative: 1) look at PacifiCorp’s planned investments in advanced metering infrastructure (and associated technology) and develop a reasonably articulated path and timeline for implementing advanced rate designs; and 2) evaluate rate design for electric vehicle charging. WRA recommended that the stakeholder process begin with foundational information provided

by PacifiCorp, in order to establish common understanding of the status of and needs for implementing advanced rate designs, and continue with discussions of opportunities for both near- and longer-term implementation of advanced rate designs and EV charging services (including pilot programs, as appropriate). WRA also made some process recommendations that do not appear to conflict with other parties' recommendations.

## **II. SCOPING RECOMMENDATIONS**

PacifiCorp's initial comments recommended a general framework for discussing a fairly wide breadth of cost of service, allocation, and rate design issues. WRA does not oppose PacifiCorp's proposed topics, but suggests, based on other parties' initial comments, that the Commission and parties may be able to hone the scope of the collaborative into more specific topics, and even to develop some goals or objectives for the working group. For example, OCS recommends that the process should focus on achieving specific outcomes. OCS comments, page 4. WRA supports the concept of focusing on specific objectives to facilitate efficient and productive discussions. WRA recommends that one outcome be to identify necessary steps and timelines for implementing advanced rate designs in Utah.

PacifiCorp's initial comments also recommended 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." PacifiCorp comments, page 1. Designing advanced rates (which have utility system and customer benefits) may implicate issues that are not traditionally pricing-related. For example, there may be upgrades to PacifiCorp's customer service system necessary in order to implement advanced rate designs that are improvements to traditional pricing tools. Achieving the full range of utility and customer benefits associated with advanced rate designs should not

be abrogated by too narrowly defining, at this time, the scope of relevant discussion. WRA recommends that the scope permit the exploration of utility investments, technology, or programs that enable advanced rate designs and maximize customer and utility value associated with advanced metering infrastructure.

### **III. PROCESS RECOMMENDATIONS**

OCS and UCE both recommend technical conferences as part of the stakeholder process, and UCE recommends that there may be appropriate opportunities for technical assistance. WRA is supportive of these recommendations. WRA believes that technical conferences, which are open to the Commission and the public, will be beneficial in terms of facilitating foundational and ongoing understanding about emerging and technical issues related to advanced rates.

Dated this 2<sup>nd</sup> day of March 2021.

Respectfully submitted,



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