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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

**REPLY COMMENTS OF THE UTAH ASSOCIATION OF ENERGY USERS ON
THE PROPOSED COLLABORATIVE STAKEHOLDER PROCESS**

The Utah Association of Energy Users (“UAE”) hereby submits this reply to the comments filed on February 16, 2020 by The Kroger Co. (“Kroger”), Western Resource Advocates (“WRA”), the Division of Public Utilities (“Division”), Rocky Mountain Power (“RMP”), Utah Clean Energy (“UCE”), and the Office of Consumer Services (“Office”).

UAE intends to participate in any prospective collaborative stakeholder process and offers the following response to comments filed by others regarding the proposed nature of that process and the topics to be covered.

A. Nature of the Collaborative Process

UAE agrees with the Division, the Office, WRA, and UCE that the collaborative stakeholder process take place within the context of a formal docket. UAE anticipates that the

parties will work together to make the collaborative process meaningful and productive. A formal process that allows the Commission to set an initial schedule and provide direction to the parties will facilitate this collaboration. It also will allow the parties to present their findings to the Commission or seek relief from the Commission should the need arise.

UAE suggests that the Commission open a new docket to facilitate these discussions, just as it did with Docket No. 20-057-11 to facilitate discussion of cost of service and rate design issues that followed the 2019 general rate case filing by Dominion Energy Utah (Docket No. 19-057-02). UAE recommends that the Commission notice a scheduling conference for all interested parties to attend to discuss a preliminary schedule, which can be refined as the parties deem necessary.

B. Scope of Topics to be Discussed

UAE supports a process that allows the interested parties to agree on a scope of topics to be discussed and the information to be provided to assist in those discussions. The comments indicate that there is a strong interest in having further discussions regarding advanced metering infrastructure (“AMI”) and advanced rate design (“ARD”). In addition to those topics, UAE is interested in further discussion on the following topics proposed by RMP:

- Retail rate unbundling;
- Generation, transmission and distribution cost of service allocation/classification methodologies; and
- Conjunctive billing/options for large customers.

The full scope of topics to be addressed can be determined by the parties after the initial scheduling conference, similar to the manner in which discussions have proceeded in Docket No. 20-057-11.

DATED this 2nd day of March 2021.

Respectfully submitted,



By:

Phillip J. Russell
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Attorneys for UAE

CERTIFICATE OF SERVICE
Docket No. 20-035-04

I hereby certify that a true and correct copy of the foregoing was served by email this 2nd day of March 2021 on the following:

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