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Reply Comments

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Doug Wheelwright, Utility Technical Consultant Supervisor

Bob Davis, Utility Technical Consultant

Date: March 2, 2021

Re: **Docket No. 20-035-04**, 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.

Recommendation

The Division of Public Utilities (“Division”) recommends the Public Service Commission of Utah (“Commission”) open a formal docket that allows technical conferences, discovery, and participation of Commission Staff, and set a time and place, or virtual, meeting where interested persons or parties can discuss the scope of the process and narrow the topics into subgroups raised in Rocky Mountain Power’s (“RMP”) general rate case.

Issue

On December 30, 2020, the Commission issued its Order in Docket No. 20-035-04, RMP’s General Rate Case (“Order”). In its Order, the Commission indicated it would accept comments by February 16, 2021, and reply comments by March 2, 2021, on the scope and format of the

collaborative stakeholder process described in its Order. This memo represents the Division's reply comments in this part of the proceeding.

Background

Throughout the general rate case proceeding, various parties proposed working groups, task forces, or other collaborative processes in connection with certain issues, adjustments, and RMP proposals discussed in testimony including the AMI Project, residential rates, a multi-site commercial rate, Schedule 32 rate design, Schedule 6A TOU rates, electric vehicle-specific rates, critical peak pricing, class cost of service allocation, and rate unbundling.

The Commission found that a collaborative stakeholder process could evaluate avenues for consensus or clarification on some or all of these issues. The Commission is seeking comments and reply comments on the scope and format of a collaborative stakeholder process. These comments may address the potential scope of the process, whether the process should involve a Commission docket or be more informal, whether any reporting is appropriate, and who should take the lead in the process.

RMP, Office of Consumer Services ("OCS"), Utah Clean Energy ("UCE"), Western Resource Advocates ("WRA"), Kroger, and the Division filed comments on February 16, 2021.

Discussion

The Division concludes there are three general areas of discussion that encompass most of the concerns raised by the parties in the GRC:

- Advanced metering infrastructure ("AMI"),
- Advanced rate design ("ARD"); and
- Large Customer, electric vehicle ("EV"), Schedule 6A, and other time of use ("TOU") rates.

These three general categories are complex issues and likely contain aspects of the other concerns raised by the parties. Narrowing the topics might allow the discussions to be less cumbersome and more productive. The Division recommends the parties discuss and determine how these and other topics can best be addressed in an initial meeting.

The Division recommends the Commission open a formal docket (or alternatively use the rate case Docket No. 20-035-04) where technical conferences, discovery, and Commission staff can participate, and set an initial meeting where interested persons or parties can discuss the scope of process and narrow the topics of discussion into subgroups. As indicated by the Commission, the Division is mindful of parties' time demands and believes, based on process discussions, parties promoting an issue or adjustment should take the lead in various topics or subgroup discussions. The Division is available to take the lead to schedule and convene the workgroup sessions but not necessarily lead the specific topical sessions.

Conclusion

The Division recommends the Commission open a formal docket and set an initial meeting where interested persons or parties can discuss the scope of process and narrow the topics of discussion into subgroups, focusing efforts where they will be most productive.

cc: Service List