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DEPARTMENT OF COMMERCE
Office of Consumer Services

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To: The Public Service Commission of Utah

From: The Office of Consumer Services

Michele Beck, Director
Alyson Anderson, Utility Analyst

Date: March 2, 2021

Subject: Docket 20-035-04 Reply Comments

In the Matter of: Working Groups, Task Forces and Collaborative Processes stemming from Rocky Mountain Power's General Rate Case.

INTRODUCTION

In testimony presented in Docket No. 20-035-04, various parties proposed working groups, or other collaborative processes in connection with certain issues, and adjustments Rocky Mountain Power (RMP) discussed in testimony. Such issues included the Advanced Meter Infrastructure (AMI) Project, residential rates, a multi-site commercial rate, Schedule 32 rate design, Schedule 6A time of use (TOU) rates, electric vehicle specific rates, critical peak pricing, class cost of service and rate unbundling. In the Order dated December 30, 2020 the Utah Public Service Commission (PSC) requested comments on or before February 16, 2021 and reply comments on or before March 2, 2021. The PSC directed the comments to address the potential scope of such processes, whether the process should be a PSC docket or informal process, whether any reporting is appropriate and who should take the lead in the process.

In accordance with the PSC's Order the Division of Public Utilities (DPU), Kroger Co., the Office of Consumer Services (OCS), Rocky Mountain Power Company (RMP), Utah Clean Energy (UCE), and Western Resource Advocates (WRA) all submitted comments regarding the collaborative processes. Following are reply comments of the OCS.

PROPOSED SCOPE AND PROCESS

While all parties who filed comments responded to the PSC's question of the potential scope and process of a stakeholder collaborative, the proposals varied. RMP suggested the scope of the collaborative stakeholder process focus on pricing and cost of service issues, not other topics like load control programs or customer service improvements not related to pricing. The OCS is confused by RMP's comments since load control programs and other advanced rate design (ARD) should be key components of RMP's pricing proposals. OCS opposes RMP's proposal to overly limit the topics as being unlikely to yield meaningful results.

The DPU recommended the PSC set a scheduling conference to discuss the scope of process. This is not consistent with how the OCS understood the PSC's order and request for comment, but is willing to participate if that is the PSC's preference.

Kroger Co. proposed the collaborative discuss a multi-site commercial rate for RMP's Schedule 6 customers. The OCS feels that this proposed scope could easily be a topic of the informal stakeholder meetings proposed by several parties.

Finally, the OCS found general alignment in the scope proposed in comments by UCE, WRA and the OCS. Those parties each recommended the scope of the collaborative process should focus on RMP's grid modernization plans through AMI and the related ARD. As such, UCE, WRA and the OCS all recommended the process should begin with an informational filing and/or presentation by RMP regarding the timeline of RMP's investments and functional capabilities of those investments. Without such a filing stakeholders will be unable to have a meaningful collaborative and serve the public interest.

While the original comments addressed an array of proposed scopes, the proposed processes were more aligned. Though Kroger did not recommend a collaborative process, and RMP proposed an informal process of meetings directed by the DPU, the remaining parties (DPU, OCS, UCE and WRA) recommended a formal docket. A formal docket would allow some level of participation by the PSC and staff, which is important in understanding grid modernization issues and technology. All parties generally agreed that participating stakeholders could volunteer to take the lead on specific meeting topics, and the DPU would issue a final status report to the PSC. If a consensus is achieved on a particular principle a settlement agreement could be filed in a future proceeding. Thus, there is a significant amount in common among the proposals. However, the OCS stresses the importance that the process begin with an informational filing by RMP, which is necessary for stakeholders to provide meaningful input and recommendations. The OCS believes that a formal docket facilitates such a filing and

could be reinforced by less formal meetings between stakeholders focused on the array of proposed scope topics.

OCS RECOMMENDATIONS

In our initial comments the OCS recommended steps for the collaborative process, and continues to recommend the following.

1. The PSC should open a formal docket, and require RMP to submit an informational filing prior to any collaborative meetings. This is an important first step in the collaborative process for RMP to share the timeline and rollout of AMI, as well as the functionality of related ARD concepts. Without this filing stakeholders will be unable to provide meaningful input toward the desired outcomes. The PSC should allow adequate time for RMP to make a robust filing. Finally, the PSC should schedule at least one technical conference for RMP to explain data and timelines, such that PSC staff and commissioners can participate with other stakeholders.
2. Following the initial filing and technical conference, parties should meet periodically, as also proposed by several parties in comments. The DPU can schedule and convene the workgroup sessions, with interested parties volunteering to take the lead on various topics of the meetings.
3. At the conclusion of a year, the DPU will file with the PSC a status report on the activity of the group. At this time, the PSC should, also, invite the other parties to submit recommendations including both comments and reply comments.

cc: Docket 20-035-04 Service List

CERTIFICATE OF SERVICE
Docket No. 20-035-04

I CERTIFY that on March 2, 2021 a true and correct copy of the foregoing **Reply Comments by the Office of Consumer Services regarding the Collaborative Process in Docket No. 20-035-04** was served upon the following:

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