



State of Utah
Department of Commerce
Division of Public Utilities

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Memorandum

To: Public Service Commission of Utah
From: Utah Division of Public Utilities
Artie Powell, Director
Brenda Salter, Utility Technical Consultant Supervisor
Mark Long, Utility Analyst
Date: July 2, 2020
Re: **Docket No. 20-035-13**, Rocky Mountain Power's Application to Revise Rates in
Tariff Schedule 98, Renewable Energy Credits Balancing Account.

Recommendation (Approval)

Based upon the Utah Division of Public Utilities (Division) review and audit of Rocky Mountain Power's (RMP) Renewable Energy Credits (RECs), the Division recommends that the Utah Public Service Commission (Commission) approve the interim rates set under this docket as final.

Issue

The Division hereby submits for filing the Division's Audit Report of the Rocky Mountain Power, Renewable Energy Credits Balancing Account (RBA) dated July 2, 2020.

Discussion

On May 29, 2020, the Commission issued its Order approving RMPs proposed RBA interim rates, with an effective date of June 1, 2020.

The Division reviewed numerous documents in the course of its audit, including RMP REC sales, request for proposals, RMP reverse request for proposals, RMP REC revenue contracts, renewable costs in base rates, the REC budget for 2019 and 2020, REC policies and procedures, and previous RBA filings. Additionally, the Division reviewed and verified that the fees billed by the Company to Kennecott complied with the confidential Non-Generation and REC Supply Agreement between Kennecott Utah Copper LLC and PacifiCorp (Kennecott Agreement), dated April 8, 2019. Based on this review, it appears the RBA is prudently managed and follows regulatory and reporting requirements.

Conclusion

The Division's audit found no discrepancies in RMP's records of the 2019 REC transactions. Based on a review of the associated 2019 REC tariff, Schedule 98, and related 2019 filings with the Utah Public Service Commission, Rocky Mountain Power appears to comply with regulatory and reporting requirements and the interim rates appear to be just and reasonable and in the public interest and should be made final

Cc: Joelle Steward, Rocky Mountain Power
Emily L. Wegener, Rocky Mountain Power
Jana Saba, Rocky Mountain Power
Michele Beck, Office of Consumer Services
Service List