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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: Utah Public Service Commission

From: Office of Consumer Services
Michele Beck, Director
Alex Ware, Utility Analyst

Date: August 16, 2021

Re: Docket No. 20-035-20
In the Matter of: Rocky Mountain Power's Low Income Lifeline Program Reports 2020 – OCS reply comments

BACKGROUND

On July 1, 2021, the Public Service Commission (PSC) issued a Notice of Filing and Comment Period following the Division of Public Utilities' (DPU) completion of its audit of Rocky Mountain Power's 2020 Low Income Lifeline Program Reports. The PSC indicated that any interested party may submit comments on the DPU's audit report by July 30, 2021 and reply comments by August 16, 2021. The Office of Consumer Services (OCS) provides the following reply comments pursuant to that schedule.

DISCUSSION

In its audit report, the DPU writes, among other things, that the ending balance of the Home Electric Lifeline Program (HELP) account in 2020 was \$1,779,587, which is more than the requirement¹ of three months-worth of surcharge collections. Therefore, the DPU recommends setting the Schedule 91 surcharge that funds this program to zero for six months to bring the balance down into the correct range.

¹ 04-035-21 - Report and Order, p. 19, November 23, 2005.

In its comments on July 30, 2021, RMP acknowledges DPU's recommendation and proposes a similar yet alternative solution to reduce the HELP lifeline account balance surplus. The two parts of the solution are:

1. Increase the monthly low income lifeline credit to \$13.95 for Schedule 3 Lifeline Program participants to ensure that the incremental value from expired credits from Schedule 135 Net Metering Service go to Schedule 3 participants as ordered by the PSC in Docket 18-035-39², and
2. Set the Schedule 91 surcharge to zero for five months to draw down the remaining balance surplus.

The OCS supports RMP's proposal to increase the Schedule 3 monthly payment to \$13.95 and draw down the remaining account surplus by reducing the Schedule 91 surcharge to zero for 5 months. We specifically agree that it is important to ensure that low income customers receive incremental value from the expired credits in accordance with previous PSC guidance on this issue.

RECOMMENDATION

The OCS recommends that the PSC approve RMP's proposal to increase the Schedule 3 monthly payments to \$13.95 and draw down the lifeline account surplus by reducing the Schedule 91 surcharge to zero for five months.

Copies to:

Rocky Mountain Power
Jana Saba, Regulatory Affairs Manager
Division of Public Utilities
Chris Parker, Director

² 18-035-39 - Order, p. 9, January 11, 2019.