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State of Utah

Department of Commerce Division of Public Utilities

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Director, Division of Public Utilities

Comments

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Brenda Salter, Utility Technical Consultant Supervisor

David Thomson, Utility Technical Consultant

Abdinasir Abdulle, Utility Technical Consultant

Date: March 23, 2020

Re: **Docket No. 20-035-T02**, Rocky Mountain Power's Proposed Changes to its Electric Service Schedule No. 94 – Energy Balancing Account.

Recommendation (Approval)

The Division of Public Utilities (Division) recommends that the Public Service Commission of Utah (Commission) approve the proposed revised tariff sheet 94.11 as filed in Rocky Mountain Power's (Company) Tariff Compliance Filing dated March 11, 2020.

Background

On March 4, 2020, the Commission issued an Order Approving Rates and Granting Unopposed Motion to Vacate Orders in Docket No. 19-035-01. In the Order, the Commission approved recovery of \$23,855,032 in total deferred 2019 Energy Balancing Account (EBA) costs to be collected over a 12-month period through Schedule 94. Subject to the Order the Company made a Tariff Compliance Filing in Docket No. 20-035-T02 dated March 11, 2020.

On March 11, 2020, the Commission issued an Action Request to the Division to review the filing and make recommendation by March 26, 2020. On March 13, 2020, the Commission in Docket No, 20-035-T02 issued a notice of filing and comment period. Comments on the Company's proposed tariff revisions may be submitted on or before Monday, March 23, 2020.

Discussion

The 2019 EBA deferred cost were partially collected from customers through Schedule 94 in interim rates beginning May 1, 2019 through July 31, 2019. The Company stated in its filing that the total collected through interim rates was \$6,868,793. With carrying charges, the remaining amount of 2019 EBA costs to be collected through Schedule 94 is approximately \$17.3 million. The Company submitted revised tariff page 94.11 along with workpapers that provide the detail and calculation of the 2019 EBA costs, carrying charges, rate spread, and pricing. The Company is requesting an effective date of April 1, 2020 for these changes.

The Division has reviewed the workpapers and calculation in the filing and believes that they support the revised tariff page 94.11 as provided by the Company.

In its filing, pursuant to the requirement of Rule R746-405-2(D), the Company stated that the proposed tariff sheet does not constitute a violation of state law or Commission rule.

Conclusion

Based on the Division's review of the Company's Tariff Compliance Filing in Docket No. 20-035-T02, the Division recommends that the Commission approve the revised tariff sheet 94.11 filed on March 11, 2020 and make it available for public inspection.

Cc: Michele Beck, Office of Consumer Services
Joelle Steward, Rocky Mountain Power
Jana Saba, Rocky Mountain Power