



State of Utah

Department of Commerce Division of Public Utilities

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Action Request Response

To: Utah Public Service Commission

From: Utah Division of Public Utilities
Artie Powell, Director
Doug Wheelwright, Utility Technical Consultant Supervisor
Bob Davis, Utility Technical Consultant

Date: June 15, 2020

Re: **Docket No. 20-035-T05 Approval of Tariff Sheet Changes**, Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Schedule No. 135, Net Metering Service.

Recommendation (Approval)

The Division of Public Utilities ("Division") recommends the Public Service Commission ("Commission") approve Rocky Mountain Power's ("RMP") proposed revisions to Schedule 135, effective July 1, 2020. The Division determined that RMP's filing complies with the Commission's Order in Docket No. 08-035-78, dated February 12, 2009.

Issue

On May 29, 2020, RMP filed with the Commission its proposed revisions to Electric Service Schedule No. 135.4, Net Metering Service, valuing net excess generation credits for large non-residential customers. RMP requests an effective date of July 1, 2020. On May 29, 2020, the Commission issued an action request to the Division requesting it to investigate RMP's filing and make recommendations. The Commission asked the Division to report back by June 15, 2020. On June 1, 2020, the Commission issued its Notice of Filing and Comment Period. Any party may submit comments on or before June 15, 2020 and reply comments on or before June

22, 2020. This memorandum represents the Division's response to the Commission's request to investigate RMP's filing.

Background

The Commission's February 12, 2009 Order in Docket No. 08-035-78,¹ directed RMP to update tariff Schedule No. 135 annually to reflect the value of net excess generation credits for large non-residential customers based on the average retail rates for the previous year's FERC Form No. 1.²

Discussion

In compliance with the Commission's Order, RMP filed its Sixth Revision to Sheet No. 135.4 of Electric Service Schedule No. 135. This sheet contains the updated net excess generation credits for large non-residential customers in Schedule 135. RMP also provided Exhibit 1, which shows the calculations for the average retail credits for large non-residential customers. The Division reviewed the variance between the numbers in Exhibit 1, which are used to calculate the average credits and the current FERC Form No. 1, Line 4-Commercial. The Division concludes that the calculations are correct. The \$.012 overall difference between Exhibit 1 and FERC Form 1 - Utah Supplemental is negligible. The Division notes that the individual change in rates for customer classes 6, 6A, 6B, 8, and 10, is less than five percent.

In review of RMP's advice letter for this matter, the Division reviewed Utah Administrative Code R746-405-2(D)(3)(g), which requires a statement that the tariff sheets proposed do not constitute a violation of state law or Commission rule. However, the rule also states that the filing of proposed tariff sheets shall of itself constitute the representation of the filing utility that it, in good faith, believes the proposed sheets or revised sheets to be consistent with applicable statutes, rules and orders. The filing does not appear to violate statute or rule.

¹ See <https://pscdocs.utah.gov/electric/08docs/0803578/0803578ROdtm.pdf>, Section V. Issue 2.b., page 20.

² See <https://pscdocs.utah.gov/electric/20docs/2003515/313441RMPUt2019AnnualRprt4-30-2020.pdf>.

Conclusion

The Division concludes that RMP's filing complies with the Commission's Order and recommends that the Commission approve RMP's filing with an effective date of July 1, 2020.

Cc: Joelle Steward, RMP
Jana Saba, RMP
Michele Beck, OCS