



# State of Utah

## Department of Commerce Division of Public Utilities

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## Comments

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Doug Wheelwright, Utility Technical Consultant Supervisor

Bob Davis, Utility Technical Consultant

**Date:** May 24, 2021

**Re:** **Docket No. 21-035-16**, Collaborative Stakeholder Process for Rocky Mountain Power's Grid Modernization and Rate Design

## Recommendation

The Division of Public Utilities (Division) appreciates Rocky Mountain Power's (RMP) Informational Filing (Filing) and Technical Conference presentation including its scope and schedule for the Advanced Metering Infrastructure (AMI), Grid Modernization, and Advanced Rate Design (ARD). The Division will participate in workgroup meetings and is available to take the lead to schedule and convene the workgroup sessions.

## Issue

On March 17, 2021, the Commission issued its Scheduling Order and Notices of Technical Conference, Comment Period, and Scheduling Conference in Docket No. 21-035-16, (Order). The Commission's Order directed RMP to file an informational filing by May 3, 2021 that would include topics of interest that are important to the stakeholders followed by a technical conference on May 10, 2021 where RMP presented its Filing. Any person may submit comments

on RMP's Filing by May 24, 2021. The Commission requests that parties come prepared to discuss the process and schedule for continued collaboration at the Scheduling Conference on June 2, 2021.

## **Background**

Throughout the general rate case proceeding, various parties proposed working groups, task forces, or other collaborative processes in connection with certain issues, adjustments, and RMP proposals discussed in testimony. Proposals included the AMI Project, residential rates, a multi-site commercial rate, Schedule 32 rate design, Schedule 6A TOU rates, electric vehicle-specific rates, critical peak pricing, class cost of service allocation, and rate unbundling. The Commission found that a collaborative stakeholder process could evaluate avenues for consensus or clarification on some or all of these issues. The Commission initiated this docket after its December 30, 2020 order in Docket No. 20-035-04 requesting a round of comments and reply comments for a scope and format of the collaborative stakeholder process related to grid modernization and rate design.<sup>1</sup>

RMP, the Office of Consumer Services (OCS), Utah Clean Energy (UCE), Western Resource Advocates (WRA), Kroger, and the Division filed comments on February 16, 2021, and reply comments on March 2, 2021. The parties' comments addressed a potential scope of the process, whether the process should involve a Commission docket or be more informal, whether any reporting is appropriate, and who should take the lead in the process.

## **Discussion**

The Division concluded in its March 2, 2021, reply comments that there were three general areas of potential discussion that encompassed most of the concerns raised by the parties in RMP's general rate case and ensuing comments requested by the Commission.<sup>2</sup> The general areas were:

- (1) Advanced metering infrastructure (AMI);
- (2) Advanced rate design (ARD); and

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<sup>1</sup> See Commission Order, Docket No. 20-035-04, December 30, 2020, page 96, section 10, <https://pscdocs.utah.gov/electric/20docs/2003504/3168662003504ro12-30-2020.pdf>.

<sup>2</sup> See Division Reply Comments, Docket No. 20-035-04, page 2, <https://pscdocs.utah.gov/electric/20docs/2003504/317601DPURplyCmntsClbrtvStkhldrPres3-2-2021.pdf>.

(3) Large Customer, electric vehicle (EV), Schedule 6A, and other time of use (TOU) rates.

The Division appreciates RMP's efforts to compile and put forth a scope of work for this collaborative process and concludes that RMP's Filing and explanation of the proposed areas of discussion during the technical conference held on May 10, 2021, include the Division's proposed topics of discussion.

Each of RMP's proposed discussion areas encompasses complex issues. The Division is mindful of parties' time demands and suggests, based on process discussions, parties promoting an issue or adjustment should take the lead in various topics or subgroup discussions. The Division is available to take the lead to schedule and convene the workgroup sessions but not necessarily to lead the specific sessions.<sup>3</sup>

## **Conclusion**

The Division appreciates the time and effort RMP dedicated to its Filing and presentation during the May 10, 2021 Technical Conference. The Division looks forward to the Scheduling Conference on June 2, 2020 and is available as needed to schedule and convene workgroup sessions.

cc: Service List

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<sup>3</sup> Id., page 3.

## CERTIFICATE OF SERVICE

I certify that on May 24, 2021, I caused a true and correct copy of the foregoing to be filed with the Public Service Commission and served by the Utah Division of Public Utilities to the following in Utah Docket 21-035-16 as indicated below:

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*/S/ Madison Galt*

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