



May 24, 2021

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84111

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

The Public Service Commission initiated this docket to create a collaborative forum for stakeholders discuss and develop proposals in furtherance of grid modernization and advanced rate design. Rocky Mountain Power (RMP) submitted an informational filing on May 2 and held a technical conference on May 8 to initiate this docket. The purpose of RMP's informational filing was to provide a baseline of information to all stakeholders and to help identify which areas of modernization and advanced rate design are ripe for this group's collaboration. The Public Service Commission invited comments on RMP's information filing. Utah Clean Energy (UCE) appreciates the opportunity to provide these comments.

As RMP said in its technical conference presentation, Utah's grid modernization process will occur over time through the combined effect of several new technologies and rates. Many of these technologies and rates will not be fully available until advanced meters are widely deployed. This collaborative process does, however, give use the opportunity to improve systems and technologies that help modernize our grid but that do not rely on AMI, and to develop pilot rates that can work with the current systems and meters.

I. Time of Use and Critical Peak Pricing Rate Pilots

Utah should focus on developing default opt-out advanced rate structures for both residential and non-residential customers. However, RMP made clear that widespread advanced rates could not be practically or cost effectively implemented on the current customer billing system and without AMI. The new customer billing system will likely be online by the end of 2024, which may align with the next general rate case. Using the next two and a half years to design and test pilot rates that we can learn from affords us the best chance of designing a successful and widely supported default advanced rate structure during the next rate case.

Several TOU pilot rates already exist and we should take the opportunity to modernize these pilot rates to better understand what an optimal TOU rate should look like once RMP's billing system and meters are updated. A driving factor underlying the investment in new grid technologies should be an assessment of net benefits to customers. Pilot projects are valuable to gather data about the actual costs of implementing new rate designs and the benefits that accrue based on resulting customer behavior change. Information from these pilots can inform the design of rates for all customers when enabled by widespread deployment of AMI. UCE proposes that the stakeholder collaborative start by discussing updates to the current TOU rates



under schedules 2, 2E, and 9A, or creating new TOU pilot rates for residential, EV customers, and non-residential customers. We could also explore additional pilot rates that leverage other advanced rate designs such as critical peak pricing. The goal will be to identify and quantify savings derived from different options by customer class to determine the best model for an opt-out option that can be deployed after AMI and the new customer billing system are implemented.

To this end, it would be helpful for RMP to provide the parties with some additional information to supplement its initial filing. Information such as a breakdown of summer and winter customer use information by class and rate schedule, hourly marginal energy costs, and its load net of renewables for 2021 and in 2024. This information will help the stakeholders better understand how best to set on-peak and off-peak hours for each TOU or CPP pilot to maximize system benefits.

II. Explore Additional Demand Response Programs and Customer Usage Programs

In RMP's initial filing and during the technical conference the utility discussed the possibility of implementing additional demand response programs. Most of this discussion focused on possibilities that will materialize after AMI is fully deployed. However, we would like to discuss any opportunities that may exist before AMI is fully deployed. To start this conversation the stakeholder group should explore the results of the Washington and Oregon demand response RFP issued earlier in 2021. This information will give parties a strong understanding of what new demand response programs are possible in today's market, and at what cost. It will also start a conversation about which measure we could explore for possible new demand response programs in Utah over the next few years.

During the technical conference RMP also discussed energy usage tools like Green Button. RMP indicated that customers have largely not taken advantage of the Green Button tool and we would like to explore ways in which we could promote this resource, and related resources, for customer use through automated access to third parties at the customers' request. We should be looking to take advantage of third-party tools and new DR pilots that can help us understand how customers are willing to interact with demand response moving forward. Further, both new DR pilots and energy usage tools could generate important information that will help develop better capacity contribution values for demand response programs once AMI is in place.

III. Transitioning to an Advanced Distribution Management System

RMP's initial filing explains that the current outage management system (OMS) could transition to a combined distribution management system and OMS after AMI is deployed. RMP also said that building an advanced distribution management system (ADMS) is also possible, which would unlock a menu of capabilities and benefits for the grid, utility, and customers. Eventually achieving an ADMS should be the goal for grid modernization in Utah. However, we recognize that this will take time to build and that it ultimately relies on AMI. The stakeholders should, however, investigate what non-AMI system and technology upgrades are necessary for



an ADMS. Assuming they are cost effective, these are upgrades that we can implement in the next few years to establish the necessary foundation for ADMS while still providing benefits to customers.

IV. Collateral Benefits that Flow from Improvements

While many of the benefits and opportunities in RMP's initial filing require AMI to work, the utility is planning to move forward with several new technologies and system improvements now. For example, RMP is currently installing the communicating faulted circuit indicators (CFCI), which are expected to, among other things, enable more sophisticated remote line reading to identify outages more easily along a distribution line. But this technology also provides the utility with better information about loading information on the distribution system, which may prove useful in improving other processes like the hosting capacity analysis necessary for siting rooftop solar. Other potential benefits include using the incremental information in concert with the distributed energy resource impact tool. PAC uses this tool to analyze whether a non-wires alternative should be used in lieu of a traditional solution to a transmission or distribution system issue. As this group works through issues and explores new opportunities, we should keep in mind that there may be collateral benefits or functionality that we should try to leverage along the way.

V. Conclusion

UCE believes that this collaborative stakeholder process can help create a foundation for grid modernization and advanced rate design that will fully mature after the next rate case. To that end, we propose that one of the primary focusses of this group should be to develop both new and updated versions of existing TOU pilots, along with any additional advanced rate design that seems pertinent, i.e., CPP rate pilots. The group should also explore what technologies and system improvements we can implement prior to AMI deployment that help facilitate ADMS, while keeping an eye out for any collateral benefits that may arise from our work. Thank you for the opportunity to provide these comments.

Sincerely,

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Certificate of Service
Docket No. 21-035-16

I hereby certify that a true and correct copy of the foregoing was served by email this 24th day of May 2021 on the following:

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