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DEPARTMENT OF COMMERCE  
Office of Consumer Services

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To: The Public Service Commission of Utah

From: The Office of Consumer Services

Michele Beck, Director  
Béla Vastag, Utility Analyst

Date: June 2, 2021

Subject: Docket 21-035-29

**Rocky Mountain Power's Fourth Annual Sustainable Transportation  
and Energy Plan Act ("STEP") Program Status Report**

STEP Program Status Report for Period Ended December 31, 2020

## INTRODUCTION

On April 29, 2021, Rocky Mountain Power ("RMP") filed its fourth STEP Program Status Report for calendar year 2020 ("2020 STEP Report") with the Utah Public Service Commission ("PSC"). On May 4, 2021, the PSC issued a Notice of Filing and Comment Period that set a deadline of June 2, 2021 for parties to file initial comments and June 17, 2021 for reply comments on RMP's 2020 STEP Report. Pursuant to the PSC's Notice, the Utah Office of Consumer Services ("OCS") submits these initial comments on RMP's Report.

## BACKGROUND ON THE ANNUAL REPORTING REQUIREMENTS FOR RMP'S STEP PROGRAM

On October 12, 2017, the PSC issued a letter approving a Reporting Template to be used by RMP for the STEP projects. The PSC based its approval of the template on the Division of Public Utilities' (DPU) recommendations and the OCS's comments, pointing out the DPU's recommendation that "the Reporting Template is intended to inform stakeholders of the STEP program's progress and funding". As part of its approval, the PSC also indicated that parties should have the opportunity to file

comments on each annual report and to suggest report modifications after each report is filed.

## **OFFICE OF CONSUMER SERVICES COMMENTS**

The OCS commends RMP's efforts in producing the annual STEP report which, due to the many complex projects of the STEP program, is not a small or easy undertaking. The OCS has performed a high level review of RMP's 2020 STEP Report and it appears that the report generally complies with the template approved by the PSC in October 2017. Though the template is generally followed, the level of detail reported does vary greatly from project to project.

The OCS has one concern on the format of the report. RMP's cover letter for the report states:

...the Company continues to modify and supplement the report based on feedback and recommendations from interested parties through various proceedings. A complete list of these changes is provided on pages 1.2 through 1.6 along with a reference to where the additional information can be found in the STEP Report, if applicable.

The 2020 STEP Report does not include the referenced pages numbered 1.2 through 1.6. The OCS assumes that the above statement is an inadvertent carryover from a previous filing and that there may have not been any modifications or supplements to the report since RMP filed its 2019 report in April 2020. The 2019 report did provide a "List of Report Changes in Compliance with Commission Orders and Other Commitments" which was actually found on pages 1.2 to 1.5 of that report. The OCS requests that RMP formally indicate that no modifications or additions have been made to this year's report or if some modifications have been made, that RMP file the additional pages indicating the changes to this 2020 STEP Report.

As mentioned above, the OCS notes that the level of reporting in the 2020 STEP Report varies greatly by project. This variance stands out, in particular, when comparing the Panguitch Solar and Storage Technology Project (see report page 13.0 or pdf page 70) and the Soleil Lofts Battery Demand Response Project (see pdf page 97). Both of these projects involve solar panels and battery systems. Both projects plan to rely on the solar panels to reduce demand on the grid and/or to charge the batteries. Both projects also plan to use the batteries to reduce demand on the grid. The Soleil Lofts project reported the results of battery demand response and grid outage events in 2020. The Soleil project also reported on the performance of its solar panels. This type of information is very useful and clearly meets the goal "to inform stakeholders of the STEP program's progress".

According to the 2020 STEP Report, for the Panguitch solar and battery project, construction was completed on November 1, 2019 and commercial operations began on March 9, 2020. It appears that these milestones occurred well before the 2020

summer peak load season when this new system would have been needed. However, unlike for the Soleil Lofts project, the 2020 STEP Report reports no results for the Panguitch project. The purpose of the Panguitch project is “to correct the voltage issues during peak loading conditions” (page 13.0 of the 2020 STEP Report). It is unusual that no results on whether the project could meet its purpose were reported when the project was in operation during the summer of 2020.

The OCS requests that RMP supplement the 2020 STEP Report to explain what has happened since the Panguitch project became operational in March 2020. Were tests run to address the voltage problem on the Panguitch transmission line? If so, what were the results? If no tests were done toward addressing the voltage issue, what has happened with the solar generation and the battery operation since March 2020? How did those systems perform? What did RMP learn?

## **RECOMMENDATIONS**

The OCS recommends that the PSC direct RMP to file a supplement to the 2020 STEP Report within 30 days, or within another reasonable time period, that provides a complete progress report, including sufficient detail (similar to the Soleil Project) for the operations of the Panguitch Solar and Battery Project. The OCS also recommends that RMP complete and include pages 1.2 through 1.6 for the 2020 STEP Report as described above, if applicable.

cc:

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