

June 17, 2021

***VIA ELECTRONIC FILING***

Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Administrator

**RE: Docket No. 21-035-29**  
**Rocky Mountain Power's Fourth Annual Sustainable Transportation**  
**and Energy Plan Act ("STEP") Program Status Report**  
*Reply Comments*

On April 30, 2021, Rocky Mountain Power ("Company") filed its fourth annual Sustainable Transportation and Energy Plan Act ("STEP") program status report ("Report"). On May 4, 2021, the Public Service Commission of Utah ("Commission") issued a Notice of Filing and Comment Period providing comment and reply comment deadlines ("Notice"). Consistent with the Notice, the Company submits reply comments in response to the comments filed by the Division of Public Utilities ("Division") and the Office of Consumer Services ("Office").

Response to the Division's Comments

The Division states that it reviewed the Report and concludes the Company followed the reporting requirements with no recommended changes. The Division discusses the Utah Solar Incentive Program ("USIP") refunds and includes a copy of Table 1 that was included in the Report on Page 19.0. The Company notes that in preparing the annual USIP report that was filed in Docket No. 21-035-34, it discovered a small reporting error in the CY 2019 refund amount. Table 1 on Page 19.0 reports \$227,376 for USIP refunds provided to customers in 2019. This amount included \$99,614 in refunds related to 2020, which were reported in both years. The Company has corrected the 2019 amount in Table 1 and has provided a corrected version of Page 19.0 and the USIP workpaper with these reply comments as Attachment 1 and Attachment 2, respectively. This correction does not change the USIP refund amount for 2020. The total refund provided to customers related to USIP is \$127,762 in CY 2019 and \$3,036,349 in CY 2020 for a total refund of \$3,164,111.

Response to the Office's Comments

The Office also states that the Report appears to comply with the reporting requirement and offers two recommendations. First, the Office noted that pages 1.2 through 1.6 were mentioned in the cover letter accompanying the Report but not included

June 17, 2021


Page 2

in the Report. The Company confirms that there were no new requirements since the last STEP report was filed in Docket No. 20-035-21. The Company included these pages because they are designed to allow parties to track all requirements since the first STEP report was filed. The Company submits pages 1.2 through 1.6 that were inadvertently omitted with these reply comments as Attachment 3.

The Office also requests that the Company supplement its Report to provide additional detail regarding the Panguitch Solar and Battery Storage project. Although the project was completed in the summer of 2020, the final report for this project is not yet complete since the team continues to work with the battery supplier to solve ongoing issues with the battery control system which has prevented the battery system from being used for voltage management. The Company anticipates having a final report on this project completed by the beginning of August 2021 and will file it once it is finalized.

As this is the fourth year of the annual STEP reports, the Company wishes to express its appreciation for the continued interest and efforts of the Division and Office in helping ensure the Report provides meaningful and accurate information. The Company appreciates the opportunity to file reply comments and looks forward to continual engagement with the parties in implementation of STEP.

Sincerely,



Joelle Steward  
Vice President, Regulation

CC: Service List - Docket No. 21-035-29

**CERTIFICATE OF SERVICE**

Docket No. 21-035-29

I hereby certify that on June 17, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Michele Beck [mbeck@utah.gov](mailto:mbeck@utah.gov)  
[ocs@utah.gov](mailto:ocs@utah.gov)

**Division of Public Utilities**

[dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov)

**Assistant Attorney General**

Patricia Schmid [pschmid@agutah.gov](mailto:pschmid@agutah.gov)  
Justin Jetter [jjetter@agutah.gov](mailto:jjetter@agutah.gov)  
Robert Moore [rmoore@agutah.gov](mailto:rmoore@agutah.gov)  
Victor Copeland [vcopeland@agutah.gov](mailto:vcopeland@agutah.gov)

**Rocky Mountain Power**

Data Request Response Center [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
Jana Saba [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)  
[utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com)  
Emily Wegener [Emily.wegener@pacificorp.com](mailto:Emily.wegener@pacificorp.com)



---

Mary Penfield  
Adviser, Regulatory Operations

# Attachment 1

## Utah Solar Incentive Program (USIP)

Revised 6/17/2021

The USIP amounts shown on page 1.0 represent the actual expenditures of the USIP program. When STEP commenced, the Company anticipated that a portion of STEP revenues would be necessary to fund the remainder of the USIP program obligations through 2023. The Company's September 12, 2016, application in Docket No. 16-035-36 assumed funds would be needed for all remaining USIP project applications that had received, or were expected to receive, conditional approvals but had not yet qualified for incentive payments. At that time, the remaining USIP obligations was estimated to be \$33.6 million. Since 2016, an estimated \$14.2 million of projects that were previously approved for incentives have expired and are no longer eligible to receive USIP funds. Therefore, the revenues collected under the discontinued Electric Service Schedule 107 ("Schedule 107") are sufficient to cover all remaining USIP incentive obligations without the use of any of the \$50 million in STEP funds.

Previously, a portion of revenues collected under STEP are credited to the USIP account. On June 28, 2019, the Commission approved the Company's request to use the STEP funds that were previously budgeted for USIP for the Advanced Resiliency Management System project. On August 20, 2019 the Commission approved the Company's request to begin refunding \$3.06 million in surplus revenue collected through Schedule 107 through a reduction in Electric Service Schedule No. 196 Sustainable Transportation and Energy Plan ("STEP") Cost Adjustment Pilot Program rates over one year beginning November 1, 2019<sup>1</sup>. For transparency and consistency with prior reports, the company will continue to report USIP expenses in the annual STEP reports.

Table 1 provides the CY 2020 USIP account balance with USIP collections under Schedule 107.

Utah Solar Incentive Program Account - Through 2020										
	Program Total	2012	2013	2014	2015	2016	2017	2018	2019	2020
Program Revenue	(23,261,688)	(961,324)	(6,293,704)	(6,320,828)	(6,317,639)	(6,323,285)	(308,633)	-	127,762	3,036,349
Program Expenditures:										
Incentive		-	981,796	2,328,676	3,292,006	4,884,763	4,766,963	3,459,713	2,317,571	1,585,779
Program Administration		-	253,665	322,664	173,248	412,866	94,788	27,098	13,807	3,881
Marketing		55,905	35,744	25,995	14,515	336	-	-	-	-
Program Development		30,748	99,140	577	-	-	-	-	-	-
Expired Deposits		-	-	-	(36,821)	(103,963)	(99,568)	-	(157,638)	-
Cool Keeper program		-	-	-	-	(200,000)	-	-	-	-
Total Expenditures	24,584,253	86,653	1,370,345	2,677,912	3,442,948	4,994,002	4,762,183	3,486,811	3,486,811	1,589,660
Interest	(3,627,377)	(5,995)	(219,165)	(473,909)	(721,712)	(685,628)	(627,425)	(569,938)	(147,937)	(175,669)
<b>USIP Account Balance (Sch. 107 only)</b>	<b>(2,304,812)</b>									

The Total Expenditure amounts showing for CY 2017, 2018, 2019 and 2020 tie to the USIP expenditures on page 1.0 of this report and also tie to Table 15 in the Company's USIP annual reports.

The 2019 and 2020 program revenue of \$127,762 and \$3,036,349 shown in Table 1 represents the credits back to customers through the reduction in Schedule 196 beginning November 1, 2019. The USIP workpaper provides the forecast program expenditures.

<sup>1</sup> See Docket No. 19-035-T12.

## Attachment 2



	2020 Total	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	2021 Total	2022 Total	2023 Total	Program Totals
Administration	\$ 15,900.00	\$ 10,200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 3,700.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 15,900.00	\$ 15,900.00	\$ 14,300.00	\$ 46,100.00
Incentive Payouts	\$ 1,773,186.66	\$ 51,447.48	\$ 13,328.83	\$ 122,110.49	\$ -	\$ 287,886.27	\$ -	\$ 36,557.63	\$ 177,044.43	\$ 193,604.20	\$ 19,268.81	\$ 283,083.71	\$ -	\$ 1,184,331.85	\$ 668,101.91	\$ -	\$ 1,852,433.75
Total Program Costs	\$ 1,789,086.66	\$ 61,647.48	\$ 13,528.83	\$ 122,310.49	\$ 200.00	\$ 291,586.27	\$ 200.00	\$ 36,757.63	\$ 177,244.43	\$ 193,804.20	\$ 19,468.81	\$ 283,283.71	\$ 200.00	\$ 1,200,231.85	\$ 684,001.91	\$ 14,300.00	\$ 1,898,533.75
<b>Administration</b>		\$ 10,200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 3,700.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 15,900.00	\$ 14,300.00		
Admin- Internal		\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 3,700.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 5,900.00	\$ 5,900.00	\$ 4,300.00	
Admin- Inspections																	
Admin- Power Clerk		\$ 10,000.00												\$ 10,000.00	\$ 10,000.00	\$ 10,000.00	
<b>Incomplete Project Incentives</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Residential																	
Small Non-Residential																	
Large Non Residential								\$ -							\$ -		
<b>Completed Large Projects</b>	\$ 51,447.48	\$ 13,328.83	\$ 122,110.49	\$ -	\$ 287,886.27	\$ -	\$ 36,557.63	\$ 177,044.43	\$ 193,604.20	\$ 19,268.81	\$ 283,083.71	\$ -		\$ 668,101.91			
RMP-00137																	
RMP-00756																	
RMP-00979																	
RMP-01055*																	
RMP-01292																	
RMP-01331																	
RMP-01361																	
RMP-10014																	
RMP-10023																	
RMP-10075																	
RMP-10088																	
RMP-10722																	
RMP-10739																	
RMP-10818																	
RMP-10916																	
RMP-11779																	
RMP-11856																	
RMP-11998																	
RMP-20685									\$ 14,661.75								
RMP-20825									\$ 156,771.21					\$ 156,771.21			
RMP-20858											\$ 43,788.30						
RMP-21154								\$ 11,163.99									
RMP-21527																	
RMP-21669																	
RMP-21673																	
RMP-21675																	
RMP-22431																	
RMP-22441																	
RMP-22667									\$ 13,043.21								
RMP-22889																	
RMP-22890																	
RMP-30041											\$ 105,707.88						
RMP-30051											\$ 82,073.96						
RMP-30104	\$ 51,447.48													\$ 51,447.48			
RMP-30120						\$ 98,887.48								\$ 98,887.48			
RMP-30159			\$ 122,110.49											\$ 122,110.49			
RMP-30825																	
RMP-31051											\$ 21,271.60						
RMP-31074											\$ 30,241.97						
RMP-31109						\$ 80,009.69								\$ 80,009.69			
RMP-31115						\$ 96,539.97								\$ 96,539.97			
<b>RMP-31161*</b>								\$ 16,651.21						\$ 16,651.21			
RMP-32081		\$ 13,328.83												\$ 13,328.83			
RMP-32088						\$ 12,449.13								\$ 12,449.13			
RMP-32608								\$ 15,415.92									
RMP-32610*									\$ 9,128.03								
RMP-32874								\$ 33,628.15									
RMP-34249											\$ 19,268.81						
RMP-34290								\$ 116,836.37									
RMP-34302							\$ 19,906.42							\$ 19,906.42			



## Attachment 3

**2020 ANNUAL STEP STATUS REPORT**  
For Period Ended December 31, 2020

**ATTACHMENT A: List of Report Changes in Compliance with Commission Orders**

The following is a list of modifications to the STEP Report, which have been suggested by interested parties in various dockets pertaining to STEP. Each item is listed along with the source of the change and where the recommendation was incorporated into the STEP Report or otherwise provided.

Docket No. 18-035-16 (First STEP Report)

Several recommendations were proposed by parties in response to the First STEP Report. Exhibit A, which accompanied the reply comments of Rocky Mountain Power filed on July 27, 2018, summarized the parties' recommendations. A revised Exhibit A is provided below containing the items that were approved by the Commission, along with a new column that provides a reference to how the Company incorporated the recommendation:

Summary of Requirements from 1st STEP Report Docket No. 18-035-16				
Topic	Division	Office	SWEEP/UCE	Compliance Reference
USIP	1) Include a spreadsheet that reconciles USIP expenditures and ending balances that correlate to the STEP Report, RMP Exhibit A.			See Page 19.0
Overall DSM/STEP Liability Account	2) Include a brief summary and spreadsheet explaining the DSM/STEP Liability and Asset balancing accounts.			See Page 1.1
Electric Vehicle	3) Include a spreadsheet explaining the Electric Vehicle ("EV") Program expenditures.			See page 2.4 and Exhibits 2A-2E
	4) Provide accounting and explanations in the annual report that demonstrate the EV Program in a more transparent manner.	1) Table 1 EVCI should be modified such that the accounting information is presented in a more easily understood format.		See page 2.0
		2) Table 3 EVCI should include the date each custom project was accepted by the Company.		See Exhibit 2-A, column "creation date"
	5) The parties should meet to discuss how to proceed with accounting for EV custom project incentives and other commitments.			Discussed at STEP Collaborative on October 23, 2018
	6) Provide at a minimum, a status report for the additional filing requirements for the EV Program.			Discussed at STEP Collaborative on October 23, 2018
			1) modify future reports to include: total number of workplace charging ports by county, the number of employers and sites, the average and range of total costs for each charging station.	See Table 2 and Exhibit 2-A in the EV program report
Clean Coal	7) File with the Commission to reallocate funds from the Alternative NOx Emission Control Technology to another program.	5) Recommends that the Commission clearly indicate that the funds associated with this project are no longer authorized to be spent unless and until the Company receives approval for a reallocation or new proposal that is found to be in the public interest.		Application Submitted 11/13/18, approved 2/6/19
Panguitch Battery Storage		3) The Company should provide an explanation on the battery storage project accounting and milestones in reply comments in this docket.		See Docket No. 18-035-16 RMP Reply Comments p. 3-4
Overall Report	8) The Division suggests that RMP provide an explanation for any external OMAG expense in future reports.			Explanation of external OMAG is provided where applicable
		4) The Company should meet with interested parties to discuss potential modifications and/or enhancements to the STEP Annual Status Report.		STEP Collaborative held on October 23, 2018

Additionally, the Office of Consumer Services requested that the Company use consistent line colors in the charts provided in the Huntington Plant Neural Network Optimization Project. The Company has updated the report accordingly.

Docket No. 16-035-36 February 6, 2019 Commission Order

On November 13, 2018 the Company filed for approval to modify the funding amounts previously authorized by the STEP Act. The Commission approved the Company's request in an order issued February 6, 2019. The order included the following additional reporting requirements for the annual STEP report:

<b>Summary of Requirements from February 6, 2019 Order (Docket No. 16-035-36)</b>		
<b>Topic</b>	<b>Requirement</b>	<b>Compliance Reference</b>
Commercial Line Extension	Include: 1) number of applications submitted 2) number of applications selected to receive incentives 3) whether recipients received multiple incentive awards 4) if awarded: a) size of project b) cost c) amount of incentive d) number of charging stations e) number of conduit extensions installed for future EV charging locations as provided for in Regulation No. 13	Page 11.0-11.1
Storage and Solar Technology Project	Meet with parties to discuss:	Meeting held on February 25, 2019
	1) Provide requested project cost data	Requested data was provided through discovery on March 25, 2019 in Docket No. 16-035-36 OCS 21.1 3rd Supplemental
	2) Develop reporting requirements for this data in annual STEP reports going forward 3) Discuss types of info to be provided after STEP ends (and in what manner)	None at this time although parties anticipate additional reporting requirements may develop as the project moves forward

Docket No. 16-035-36 June 28, 2019 Commission Order

On March 8, 2019 the Company filed for approval of three new innovative utility programs under the STEP Act. The Commission approved the Company’s request in an order issued June 28, 2019. The order included the following additional reporting requirements for the annual STEP report:

<b>Summary of Requirements from June 28, 2019 Order (Docket No. 16-035-36)</b>		
<b>Topic</b>	<b>Requirement</b>	<b>Compliance Reference</b>
Intermodal Hub	STEP Annual Report include progress on achieving the project's four tasks outlined in the Application	Starting on Page 17.0
	- Provide cost benefit analysis at project conclusion (Office)	will be provided at conclusion
	- Report on any elements that are not resolved within appropriate timeframes (Office)	will be reported if applicable
EXIT strategy Meeting	Include a summary of meeting in STEP Report (Division & PSC recommendation)	See Docket No. 20-035-21, Page 1.6
Ongoing OMAG	reporting on ongoing OMAG (Office)	See Docket No. 20-035-21, Page 1.6
Other	Quarterly updates w/ project accounting (Division and Office)	Ongoing
Battery Demand Response	comprehensive performance update report - mid year and in STEP report (WRA - RMP reply comments)	Nothing to report at this time.
	- proof of permit from city (Division)	filed Docket No. 16-035-36, 8/28/19
	- legal protections for ratepayers (Division)	filed Docket No. 16-035-36, 4/17/20

Docket No. 19-035-T12 August 20, 2019 Commission Order

On July 23, 2019 the Company filed for approval to refund \$3.06 million in surplus revenues collected under the discontinued Schedule 107 related to the canceled Utah Solar Incentive Program through a reduction in the STEP surcharge collections through Schedule 196. The Commission approved the Company's request to refund the revenues over 12 months beginning November 1, 2019. The order included the following additional reporting requirement for the annual STEP report:

<b>Summary of Requirements from August 20, 2019 Order (Docket No. 19-035-T12)</b>		
<b>Topic</b>	<b>Requirement</b>	<b>Compliance Reference</b>
USIP	Order: include the additional USIP balance reporting that the DPU requested in its August 9, 2019 comments in RMP's annual STEP and USIP status reports. DPU comments: The Division recommends the Commission direct RMP to include in its Annual STEP Report and Annual USIP Report an accounting of the USIP balance including the current variable charges explained above.	See USIP Explanation beginning on Page 19.0.

Docket No. 19-035-17 (Second STEP Report)

Below is a summary recommendations from the 2<sup>nd</sup> annual STEP report:

<b>Summary of Requirements from 2nd STEP report (Docket No. 19-035-17)</b>		
<b>Topic</b>	<b>Requirement</b>	<b>Compliance Reference</b>
USIP	coordinate and add detail on USIP	See USIP Explanation beginning on Page 19.0.
Accounting Summary	add footnote - see revised exhibit A (Office)	Footnote added to Page 1.0
Line extension	- specify number of applications received better - clarify if anyone received multiple rewards - check column labels on table 2	Pages 11.0-11.2

Docket No. 20-035-21 (Third STEP Report)

There were no new recommendations from the 3rd annual STEP report.