



State of Utah
Department of Commerce
Division of Public Utilities

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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Doug Wheelwright, Utility Technical Consultant Supervisor

Brenda Salter, Utility Technical Consultant Supervisor

Gary Smith, Utility Technical Consultant

Joanna Matyjasik, Utility Analyst

Date: March 15, 2021

Re: **Docket No. 21-035-T03**, Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Schedule No. 94, Energy Balancing Account.

Docket No. 20-035-01, Application of Rocky Mountain Power to Increase the Deferred EBA Rate through the Energy Balancing Account Mechanism.

Recommendation (Approve Tariff Sheets)

The Division of Public Utilities (Division) recommends that the Public Service Commission of Utah (Commission) approve the proposed revised tariff sheet 94.11 as filed in Rocky Mountain Power's (Company) Compliance Filing dated March 3, 2021.

Background

On February 26, 2021, the Commission issued an Order Approving Rocky Mountain Power's Application for Approval of the 2020 Energy Balancing Account (EBA) in Docket No. 20-035-

01 (Order). In the Order, the Commission granted the Company's recovery of the actual costs claimed in its Application through the EBA with the following modifications:

1. The Company's recoverable EBA Costs will reflect the SO Adjustment and any associated interest expense.
2. The Company may not recover any replacement power costs or interest expense associated with the Wyodak Outage.
3. The Company may recover its replacement power costs associated with the Dave Johnson Outage but the EBA recoverable amount will be adjusted to reflect the full amount of the Manufacturer's Discount.

The Order approved recovery of the total deferred 2020 EBA costs be collected over 12 months through Schedule 94. Subject to the Order, the Company made a Tariff Compliance Filing in Docket No. 21-035-T03 and Docket No. 20-035-01 dated March 3, 2021. The Company included workpapers showing an EBA cost increase of \$36,786,109 based on the Commission's adjustments in the Order. This total increase includes a Manufacturer's Discount of \$17,986.27 (total-Company).

On March 3, 2021, the Commission issued an Action Request to the Division to review the filing and make a recommendation by March 17, 2021. On March 8, 2021, the Commission in Dockets Nos. 21-035-T03 and 20-035-01, issued a notice of filing and comment period. Comments on the Company's proposed tariff revisions may be submitted on or before Monday, March 19, 2021.

Discussion

The Company submitted revised tariff page 94.11 along with workpapers that provide the detail and calculation of the 2020 EBA costs, carrying charges, rate spread, and pricing. The Company is requesting an effective date of March 1, 2021, for these changes. Pursuant to the requirement of Rule R746-405-2(D), the Company stated that the proposed tariff sheet does not constitute a violation of state law or Commission rule.

The Division has reviewed the workpapers and calculation in the filing and believes that they support the revised tariff page 94.11 as provided by the Company.

Conclusion

Based on the Division's review of the Company's Tariff Compliance Filing in Dockets Nos. 21-035-T03 and 20-035-01, the Division recommends that the Commission approve the revised tariff sheet 94.11 filed on March 3, 2021, and make it available for public inspection.

Cc: Michele Beck, Office of Consumer Services
Joelle Steward, Rocky Mountain Power
Jana Saba, Rocky Mountain Power