



State of Utah  
Department of Commerce  
Division of Public Utilities

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## Action Request Response 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

Brenda Salter, Utility Technical Consultant Supervisor

Abdinasir Abdulle, Utility Technical Consultant

Bob Davis, Utility Technical Consultant

**Date:** May 17, 2021

**Re:** **Docket No. 21-035-T05**, Schedule 37 Avoided Cost Purchases from QFs.

### Recommendation (Acknowledge)

The Division of Public Utilities (“Division”) has reviewed Rocky Mountain Power’s (“RMP” or “Company” or “Utility”) proposed updates to Schedule 37 for qualifying facilities that was filed with the Public Service Commission (“Commission”) on April 30, 2021. The filing is in compliance with the Commission Orders in Docket Nos. 08-035-78 and 12-035-T10 and recommends the Commission approve the Company’s filing.

### Issue

On April 30, 2021, in compliance with previous Commission Orders, RMP filed its Advice Filing 21-03, in which it requested tariff changes to Schedule 37 – Avoided cost purchases from Small qualifying facilities. On May 4, 2021, the Commission issued a Notice of Filing and Comment Period in which it asked any interested party to submit comments on or before

Monday, May 17, 2021 and reply comments on or before Monday, May 24, 2021. This memorandum represents the Division's comments on the Company's filing.

## **Discussion**

In its Order, dated February 12, 2009,<sup>1</sup> the Commission directed the Company to annually update the avoided cost pricing in Schedule 37 in order to establish the value or credit for net excess generation of large commercial customers under Schedule 135 Net Metering Service. In its Order, dated November 28, 2012,<sup>2</sup> the Commission directed the Company to file future annual filings within 30 days of filing the Company's Integrated Resource Plan ("IRP") or by April 30 of each year, whichever comes first.

In compliance with these Orders the Company filed its updated avoided cost pricing for Schedule 37 on April 30, 2021. The Division reviewed this filing in light of the relevant Commission Orders. The Division concludes that the Company made its filing in compliance with the Commission Orders. The Division also concludes the avoided calculations are made consistent with the approved method. However, the Division noticed a significant increase in the 15-year levelized on-peak summer prices between this filing and the previous in 2020. In a response to OCS Data Request 1.2, which is attached to this document, the Company attributed this change in the avoided costs primarily to the higher prices in the March 31, 2021 Official Forward Price Curve (OFPC) relative to that of December 31, 2019 and other input changes. Therefore, the Division recommends that the Commission acknowledge the updates to Schedule 37.

## **Conclusion**

The Division concludes that RMP's filing complies with the Commission's Orders and recommends that the Commission approve RMP's filing.

Cc: Michele Beck, OCS  
Jana Saba, RMP

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<sup>1</sup> Docket No. 08-035-78

<sup>2</sup> Docket No. 12-035-T10