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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

Brenda Salter, Utility Technical Consultant Supervisor

Bhavana Venjimuri, Utility Analyst

Date: July 26, 2021

Re: Docket No. 21-035-T08, In the Matter of Rocky Mountain Power's Proposed Tariff

Changes Associated with PacifiCorp's Advanced Metering Infrastructure Project and

various Housekeeping Changes.

Recommendation (Approval)

The Division of Public Utilities (Division) recommends that the Public Service Commission of Utah (Commission) approve Rocky Mountain Power's (RMP or Company) proposed revised pages associated with tariff 51 P.S.C.U Nos. B1, 2E, 6A, 80, 97, 136, 300 and Regulation 7, applicable to the electric service in the State of Utah, effective October 1, 2021.

Issue

On July 13, 2021, RMP filed Advice No. 21-06 with the Commission proposing revisions to pages associated with tariff 51 P.S.C.U Nos. B1, 2E, 6A, 80, 97, 136, 300 and Regulation 7, applicable to the electric service in the State of Utah with an effective date of October 1, 2021. On July 14, 2021, the Commission issued an action request to the Division requesting it to investigate RMP's filing and make recommendations. The Commission asked the Division to



report back by July 27, 2021. This memorandum represents the Division's response to the Commission's request to investigate RMP's filing.

Discussion

The proposed changes represent a collection of updates related to the Company's advanced meter infrastructure ("AMI") project and other housekeeping changes. Additional information on each of the changes is included below.

Electric service schedule No. 300 – Regulation Charges

RMP will begin deployment of Advanced Metering Infrastructure (AMI) to Utah customers in the fall of 2021 with installation continuing through 2022. The revised 300.2 tariff sheets will add a new reconnection fee of \$8.75 to reflect the cost of service for residences where AMI has been installed and fully functional. The cost of service is calculated based on the average cost of a call to the Company's call center including labor, material, and operating costs required to process the customer's initial request to have power turned on, with no truck expense or field labor expense included in the calculation of the fee. The proposed remote reconnect fee is subject to the existing terms stated in Electric Service Regulation No. 10 for electric service disconnection due to non-payment by the customer.

Currently, the Company's reconnection charges in Electric Service Schedule No. 300 specify charges to reconnect that are based on the costs under the current meter capabilities, which require an employee to be dispatched and the residences do not have AMI installed.

The AMI project in Utah will not replace all existing meters. There will be no changes proposed to the current reconnection fees listed in Schedule No. 300 that require a site visit.

Electric Service Regulation No. 7

For the customers who have opted for non-standard meter, the Company proposes to add the following statement to Regulation No. 7: "Customers who choose non-standard metering may be excluded from participating in Company offered programs for which a standard meter is required."

Electric schedule No. 136 – Transition Program for Customer Generations

The Company proposes to add a new special condition to Electric Service Schedule No. 136-Transition Program for Customer Generations ("Schedule 136") to prohibit customers taking service under this schedule from opting out of a standard meter. A significant benefit of the AMI project is the automation of the data collection process. Since 15-minute netting is required for Schedule 136, it is appropriate to require that participating customers receive an AMI meter.

The Company also proposes to add the word "Applicable" to the section regarding costs for a non-standard meter on Sheet No. 300.1. It will reflect the fact that not all rate schedules may be eligible to elect this fee.

Housekeeping Tariff Changes

The Company has corrected the error and added back the following paragraph to Sheet No. 6A.3. "Due to the expansions of Daylight Saving Time (DST) as adopted under Section 110 of the U. S. Energy Policy Act of 2005 the time periods shown above will begin and end one hour later for the period between the second Sunday in March and the first Sunday in April, and for the period between the last Sunday in October and the first Sunday in November". This paragraph had been previously included in the rate schedule since it was authorized February 20, 2007 in Docket No. 06-035-T10 but inadvertently removed in the February 9, 2021, compliance filing.

The company propose to change the Electric service schedule 2E.2 to reflect the corrected filling and remove the errors made during the previous compliance filing.

The company included the Wildfire Mitigation Balancing Account as a new Electric Service Schedule No. 97 and the related updates to add it to the tariff index Sheet No. B1 and Electric Service Schedule 80 approved by the commission in the December 30,2020 order on the GRC. The Company added an asterisk to the Transition Program for Customer Generators on Sheet No. B1 to denote that it is now a schedule that is not available to new customers or premises per the Commission's October 30, 2020 order in Docket No. 17-035-61.

Conclusion

The Division concludes that RMP's filing is reasonable and appropriate updating and correcting the associated tariff 51 P.S.C.U Nos. B1, 2E, 6A, 80, 97, 136, 300 and Regulation 7. The Division recommends that the Commission approve RMP's updated Tariff 51 P.S.C.U Nos. B1, 2E,6A, 80, 97, 136, 300, Regulation 7 and the house keeping tariff charges filed on July 13, 2021, and make it effective October 1, 2021.

Cc: Michele Beck, Office of Consumer Services Michael Snow, Rocky Mountain Power Jana Saba, Rocky Mountain Power