

September 22, 2021

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Administrator

RE: Docket No. 21-035-T10
Application of Rocky Mountain Power for Approval of Billing for Other Entities
Tariff, Electric Service Schedule No. 299
Reply Comments

On August 31, 2021, Rocky Mountain Power (“Company”) filed an application for approval to implement a new tariff, Electric Service Schedule No. 299 – Billing for Other Entities (“Schedule 299”). On September 2, 2021, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment Period (“Notice”) establishing a comment period related to the Company’s application. On September 15, 2021, the Division of Public Utilities (“Division”) and the Office of Consumer Services (“OCS”) filed comments. Division recommends the Commission approve the proposed Schedule 299. The OCS also generally supports the implementation of Schedule 299, but requests the Company provide additional support in reply comments. Consistent with the Notice, the Company submits reply comments in response to the OCS’ recommendations.

RMP Response to the OCS

In its comments, the OCS makes the following recommendations as conditions for approval of Schedule 299:

1. Demonstrate that grandfathering the Company’s Existing Contracts is in the public interest and provide a redline Schedule 299 tariff to clarify this treatment.
2. Demonstrate that the Existing Contracts are complying with the Utah Administrative Rule R746-460-3.
3. Clarify the treatment of Assigned Fees that are billed but not collected.

Existing Contracts

As stated in the Company’s application, there are five active contracts (“Existing Contracts”) for which the Company is proposing to grandfather the Billing Fees that are stated in the contract. The OCS requests the Company provide additional information to demonstrate that grandfathering the Billing Fees is in the public interest. Confidential Attachment 1 provides the

requested information for each of the Existing Contracts. As shown in Confidential Attachment 1, the Billing Fees under three of the five existing contracts reflect the same pricing as the proposed Schedule 299. In the two Existing Contracts with differences in the Billing Fees, the only differences between the contract and the Billing Fees in proposed Schedule 299 are in the 2nd and 3rd tiers. Updating the two Existing Contracts to the Schedule 299 pricing would decrease the revenue by \$3,000 per year. Because of the relatively immaterial impact in revenues, the Company does not believe an update in pricing for those two contracts is necessary at this time. Both of these Existing Contracts end in 2026 and if they are renewed the Company will update the pricing consistent with the tariff at that time.

In response to the OCS's concern that Schedule 299 could be clearer about the grandfathering treatment of Existing Contracts, Attachment 2 is a redlined version of the proposed Schedule 299 that has been modified to add the clarity recommended by the OCS.

The Company also clarifies that other than the Billing Fees, it intends for all other aspects of proposed Schedule 299 apply to the Existing Contracts. Since the agreements were executed, the process to provide the services has included the Company providing reports to the Entity that contain the customer name, address, and company site ID so the Entity is able to reconcile payments with each of their residents. For the Existing Contracts with Millard, Taylorsville, Sanpete and Beaver, that were in place before Utah Administrative Rule R746-460-3 was implemented, the Company has continued to update the reports that contain this information.

Assigned Fees

The OCS also requested that the Company clarify when the Company deducts any unrecovered Assigned Fees from the payments sent by the Company to the Entities. The Company clarifies that it remits payments to the Entity monthly, and once per year reconciles Assigned Fees with the payments to the Entities. If a customer is over 90 days in arrears, then the Company removes the Entity's charges from the electric bill and the Entity is then responsible to collect from the customer. The Company believes this process fairly balances the Company's administrative efforts to provide this service to the municipalities with the incremental costs.

Sincerely,



Joelle Steward
Vice President, Regulation

CC: Service List - Docket No. 21-035-T10

CERTIFICATE OF SERVICE

Docket No. 21-035-T10

I hereby certify that on September 22, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

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Mary Penfield
Adviser, Regulatory Operations

Attachment 1

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER SEPARATE
COVER**

Attachment 2

ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 299

STATE OF UTAH

Billing for Other Entities

DEFINITIONS:

Assigned Fees: Non-electric fees, which are specifically described in any Billing Services Agreement, for services provided by an Eligible Entity to a customer that are eligible for collection through Rocky Mountain Power's utility bill by relevant law.

Billing Services Agreement: An Existing Agreement or future agreement between Rocky Mountain Power and an Eligible Entity that memorializes the specific terms of the assignment of the right to bill and collect Assigned Fees consistent with this Schedule.

Eligible Entity: A municipality or an agency of a municipality, county, state, or the federal government that satisfies the requirements of Utah Code section 54-4-37.

Existing Agreement: A Billing Services Agreement between Rocky Mountain Power and an Eligible Entity executed prior to the effective date of this Schedule.

PURPOSE: This Schedule governs Rocky Mountain Power's Existing Agreements and future Billing Service Agreements.

AVAILABILITY: Rocky Mountain Power may contract with an Eligible Entity to utilize the Rocky Mountain Power utility bill to charge customers Assigned Fees, subject to the provisions set forth in this Schedule. Rocky Mountain Power will only contract with an Eligible Entity pursuant to this Schedule if it determines, in its reasonable discretion, that allowing the Eligible Entity to utilize the Rocky Mountain Power utility bill is not likely to adversely impact Rocky Mountain Power's customers.

An Eligible Entity must provide Rocky Mountain Power a copy of the applicable ordinance, resolution, or other approved legislation granting the Eligible Entity the authority to collect the non-electric fee. An Eligible Entity must also provide Rocky Mountain Power with a copy of the notice to

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its customer informing them that the non-electric fee will be billed and collected through their Rocky Mountain Power electric bill.

SHARING OF UTILITY CUSTOMER INFORMATION: Rocky Mountain Power may provide the Eligible Entity with utility customer information, such as name, service address and billing address for use in providing services under this Schedule and consistent with Utah Administrative Code Rule R746-460-3. An Eligible Entity will use the utility customer information provided only for the purposes of this Schedule and will maintain the information as confidential consistent with Rule R746-460-3.

RATE: An Eligible Entity seeking to utilize the Rocky Mountain Power utility bill to charge customers shall pay monthly charges as follows:

i.	1 – 1,000 customer billings = \$ 500.00 per month
ii.	1,001 – 2,000 customer billings = \$1,000.00 per month
iii.	2,001 – 3,000 customer billings = \$2,000.00 per month
iv.	3,001 – 5,000 customer billings = \$2,500.00 per month
v.	5,001 – 10,000 customer billings = \$4,000.00 per month
vi.	10,001 – 15,000 customer billings = \$5,000.00 per month
vii.	15,001 – 20,000 customer billings = \$6,000.00 per month
viii.	20,001 – 25,000 customer billings = \$7,000.00 per month
ix.	25,001 – 30,000 customer billings = \$8,000.00 per month
x.	30,001 – 35,000 customer billings = \$9,000.00 per month

For an Eligible Entity with more than 35,000 customer billings, the charge shall be \$10,000.00 plus \$1,000 for each 5,000 customer billings in excess of 35,000. To the extent the Rates above differ from the contract under an Existing Agreement, the Rates in the Existing Contract apply until the time in which the Existing Agreement is renewed.

APPLICATION OF PAYMENT: Consistent with Utah Code section 54-4-37, if a payment received from a customer is less than the amount owed for the utility service and the amount owed for the non-electric fee, then all monies received from the customer will first be applied to pay for the electric utility service with the remainder applied to the Assigned Fees. Rocky Mountain Power may notify its customers that become delinquent in the payment of the Assigned Fees of such delinquency and may make reasonable efforts to collect the Assigned Fees from such customers. However, Rocky Mountain Power shall not issue electric service disconnect notices based solely upon past-due Assigned Fees. Rocky Mountain Power will not issue notices of disconnection to customers on behalf of the Eligible Entity for any reason. Rocky Mountain Power shall not undertake efforts to collect the Assigned Fees other than those normally undertaken to collect the charges for electric utility service. Revenues from late fees that are added to a customer's bill in accordance with Electric Service Regulation No. 8(5) associated with the Assigned Fees will be passed on to the Eligible Entity.

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DISPUTE RESOLUTION: Rocky Mountain Power may respond to general inquiries by customers regarding the Assigned Fees, such as billing calculations, status of collections, and payments. However, disputes and inquiries concerning the Assigned Fees shall be the sole responsibility of the Eligible Entity. Rocky Mountain Power will refer the customer to the Eligible Entity for resolution based on the authority of the Eligible Entity.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Billing Services Agreement.

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FILED: August 31, 2021
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EFFECTIVE: TBD