



State of Utah

Department of Commerce  
Division of Public Utilities

MARGARET W. BUSSE  
*Executive Director*

CHRIS PARKER  
*Director, Division of Public Utilities*

SPENCER J. COX  
*Governor*

DEIDRE HENDERSON  
*Lieutenant Governor*

## 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

Abdinasir Abdulle, Utility Technical Consultant

David Williams, Utility Technical Consultant

**Date:** November 2, 2021

**Re:** **Docket No. 21-035-T12** Rocky Mountain Power's Tariff Sheets in Compliance with the Commission's Order in Docket No. 20-035-04, dated December 30, 2020 for Rate Changes Effective January 1, 2022.

### Recommendation (Approve Tariff Sheets)

The Division of Public Utilities (Division) has reviewed Rocky Mountain Power's (RMP or the Company) Compliance Filing and verified its accuracy. The Division recommends the Public Service Commission of Utah (Commission) approve the Company's Compliance Filing. The Division also recommends the Commission not approve the Company's proposal that the changes to tariff sheets submitted in RMP's Application for Alternative Cost Recovery for Major Plant Additions of the Pryor Mountain and TB Flats Wind Projects (MPA Application) in Docket No. 21-035-42 should override those submitted in this Compliance Filing.

## **Issue**

On October 19, 2021, RMP filed tariff revisions in compliance with the Commission's Order in RMP's 2020 general rate case, issued on December 30, 2020 (2020 Order). On October 20, 2021 the Commission issued an Action Request for the Division to review the tariff filing for compliance and report its findings and recommendation to the Commission by November 2, 2021. Subsequently, the Commission issued a Notice of Filing and Comment Period in which it asked any interested party to submit comments on or before Wednesday, November 3, 2021 and reply comments on or before Wednesday, November 10, 2021. This memorandum represents the Division's comments on the Company's filing.

## **Discussion**

Rocky Mountain Power submitted for approval its tariff revisions in compliance with the Commission's 2020 Order in Docket No. 20-035-04 and is requesting an effective date of January 1, 2022. The Company submitted revised tariff pages along with a complete new tariff and tariff index sheet.

The Division completed a review of the Compliance Filing comparing it to the Commission's 2020 Order. In its filing, the Company noted that there was an error in the 2020 Order. The residential customers received \$0.5 million refund, in the first year, above what was in the 2020 Order. To correct this error, the Company proposed the residential refund be reduced by \$0.5 million in the second year. The Company calculated the impact of this proposal as a change in the second year Schedule 197 price for residential customers from -1.51 percent to -1.44 percent. The Division reviewed this claim and verified its accuracy.

The Company filed an MPA Application in Docket No. 21-035-42, which includes changes to tariff sheets. The Company proposes that if the Commission approves the MPA Application, the changes to its tariff sheets included in that docket should override those submitted in this compliance filing. The Division notes that the MPA Application is a separate proceeding that is currently being litigated before the Commission. The final outcome of that proceeding is uncertain and should not be included as part of this proceeding. The Division will evaluate the

Company's proposal when the Commission Order on that proceeding becomes available.  
Therefore, the Division recommends the Commission not approve an MPA tariff override.

## **Conclusion**

The Division reviewed the Tariff Compliance Filing and verified the tariff changes are consistent with the Commission's 2020 Order. The Division recommends the Commission approve the tariff changes as submitted. The Division also recommends the Commission not approve any action regarding the Company's tariff sheets submitted related to the MPA Application.

Cc: Joelle Steward, RMP  
Jana Saba, RMP  
Michele Beck, OCS