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Salt Lake City, Utah 84116

December 22, 2021

VIA ELECTRONIC FILING

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

Attn: Gary Widerburg
Commission Secretary

RE: Advice No. 21-08
Proposed Changes to Schedule Nos. 70 and 72, Renewable Energy Rider and Renewable Energy Rider Bulk Purchase
Docket No. 21-035-___

Enclosed for electronic filing are the proposed tariff sheets associated with Tariff P.S.C.U. No. 51 of PacifiCorp, d.b.a. Rocky Mountain Power (the “Company”), applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405-2(D), the Company states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Company respectfully requests an effective date of February 1, 2022 for these changes.

First Revision of Sheet No. 70.1	Schedule 70	Renewable Energy Rider
First Revision of Sheet No. 70.2	Schedule 70	Renewable Energy Rider
First Revision of Sheet No. 72.1	Schedule 72	Renewable Energy Rider Bulk Purchase
First Revision of Sheet No. 72.2	Schedule 72	Renewable Energy Rider Bulk Purchase

The purpose of this filing is to propose changes to the Blue Sky Program (“Program”) administered through Electric Service Schedule Nos. 70 and 72, specifically to revert the standard Blue Sky block size back to 100 kilowatt hours (“kWh”) from 200 kWh of renewable energy, as well as some housecleaning items. Proposed changes to the Schedule 70 and 72 tariff sheets are included as Exhibits A and B, respectively.

BACKGROUND

In 2000, PacifiCorp launched Blue Sky Program to allow customers wanting to be served by RECs to offset some or all of their usage from renewable energy sources while also supporting renewable energy development. The Program is self-funded, and the funds collected are used to acquire RECs and cover administration and Program growth costs. Funds remaining after REC purchases and marketing/administration expenses are made available to help fund new community-based renewable energy installations through a competitive grant application process.

BLUE SKY BLOCK SIZE

Pursuant to Confidential Figure 1 below, the price of RECs from 2012-2019 remained stable between [REDACTED] dollars. This helped inform the Company's decision to file Advice No. 19-15 on October 25, 2019 in Docket No. 19-035-T15 requesting approval to increase the size of each Blue Sky block from 100 kWh to 200 kWh of renewable energy while maintaining the current price of \$1.95 per block in an effort to meet growing customer demands in the renewable energy sector and to better align with market conditions for REC prices.¹ The Commission approved the Company's filing in its Tariff Approval Letter issued November 21, 2019, effective January 1, 2020. The Company made similar filings in all six states where the Program was offered, with the proposed changes being contingent upon the Company receiving approval from all six states in order to maintain uniformity in Program management operations. Enclosed with this filing is a Confidential Information Certificate that the Company desires parties in this docket to execute prior to obtaining access to confidential information.

However, since 2020 the price of RECs has increased to a point where it is unsustainable for the Program to maintain the size of each block at 200 kWh. Accordingly, the Company requests to revert the size of each block back to 100 kWh to address the market fluctuation.

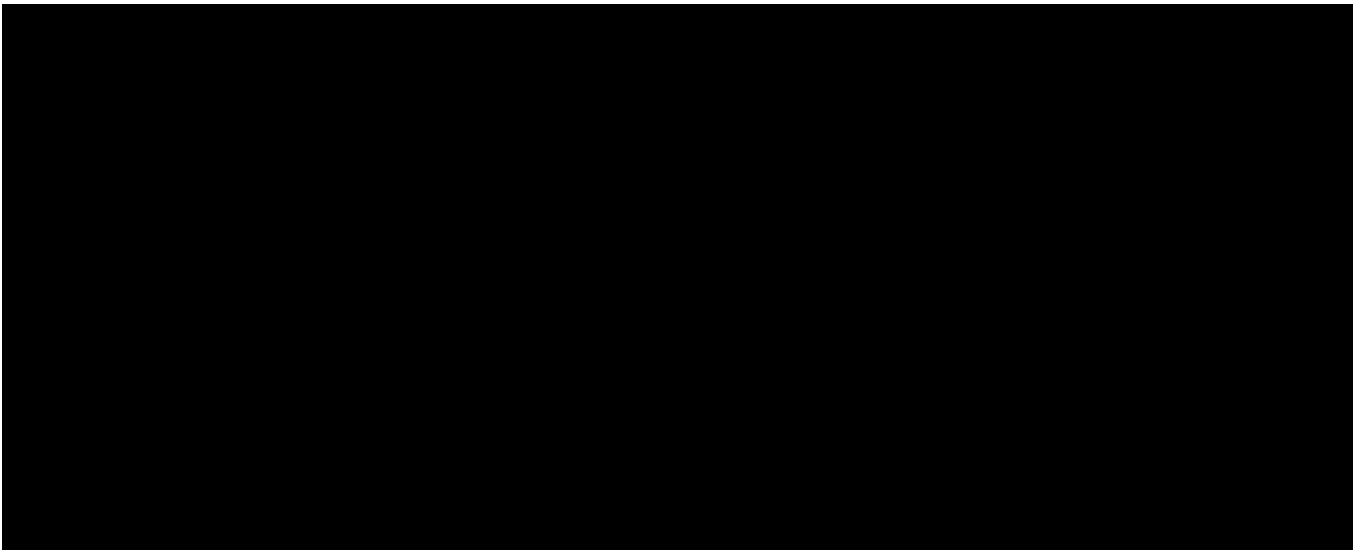


Table 1 below is a comparison forecast for 2022 to show estimated Program expenditures if the block size remains at 200 kWh versus if it reverts to 100 kWh. As reflected in Table 1, if the block size remains at 200 kWh, the Program will not have enough funds to cover both REC purchases and administrative costs, and will have no funds available for community renewable project grants. Conversely, if the block size reverts to 100 kWh, REC purchases will be halved, enabling the Program to have enough funds to cover REC purchases and administrative costs, and will have funding available for community renewable project grants.

¹ The proposed increase to standard block size did not alter individually negotiated contracts, including any contracts that were currently in place to facilitate direct purchase of RECs or any future individually negotiated agreements.

Table 1 – 2022 Forecast Comparison

Expense Category	2022 Forecast with 200 kWh Blocks		2022 Forecast with 100 kWh Blocks	
Program Revenue	\$2,879,000		\$2,879,000	
Program Expenses	-\$456,000	15.8%	-\$456,000	15.8%
REC Purchases	-\$2,748,633	95.5%	-\$1,374,316.50	47.7%
Available Grant Funds	\$0.00	0.0%	\$1,048,683.50	36.4%

COMMUNICATION PLAN

If approved, the Company will notify customers of this adjustment in multiple forums, including email and bill messaging, messaging on customers’ annual “thank you” and welcome letters, and notices prominently displayed on the Program website. All marketing materials for the Program will also be updated to reflect the updated block size. An example email communication to customers is attached hereto as Exhibit C.

HOUSECLEANING

In addition to the proposed changes discussed above, some minor redlined changes have been made to the Schedule 70 and 72 tariff sheets. These redlined changes are meant to provide clarity and remove outdated or unnecessary language. For example, customers do not need to be interconnected to the system in order to participate in the Program.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com
michael.snow@pacificorp.com

By regular mail: Data Request Response Center
 PacifiCorp
 825 NE Multnomah Blvd., Suite 2000
 Portland, OR 97232

Informal inquiries regarding this matter may be directed to me at (801) 220-4214.

Sincerely,



Michael S. Snow
 Manager, Regulatory Affairs

Enclosures