

# **Division Audit Report of**

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## ***Rocky Mountain Power’s Renewable Energy Rider “Blue Sky” Program***

**January 1, 2021 – December 31, 2021**

**Docket No. 22-035-09**

Prepared by Utah Division of Public Utilities

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## **PURPOSE**

The Utah Division of Public Utilities (Division) has completed an audit of Rocky Mountain Power's (Company) Renewable Energy Rider or "Blue Sky" program.<sup>1</sup> The intent of this audit was to review the revenues and expenses of the Blue Sky program as reported by the Company for the year ended December 2021 and test compliance of the program to the Public Service Commission (Commission) Orders and to Tariff Schedules 70 and 72.

## **BACKGROUND**

Two program options are available to Rocky Mountain Power customers. The first program is a "block" option. For the year ended December 2021, one block equals 200 kWh of renewable energy at a cost of \$1.95 each and is available to customers receiving service under Schedules 1, 2, 3, 6, 6A, 6B, 9, 9A, 10, 23 or Utah Municipal (Rocky Mountain Power Electric Service Schedule No 70). Participating customers are billed monthly on their Rocky Mountain Power statement as a separate line item. The second program is the "bulk" option. For the year ended December 2021, one block equals 200 kWh of renewable energy but requires a minimum purchase of 1,212 blocks per year at a cost of \$0.70 per month and a fixed per year charge of \$1,500. This program is available to non-residential customers receiving service under Schedules 6, 6A, 6B, 9, 9A, 10, or 23 (Rocky Mountain Power Electric Service Schedule Number 72). The bulk option allows the customer to choose to be billed monthly, twice yearly, or annually on their Rocky Mountain Power statement.

Both programs are voluntary for customers interested in supporting the purchase and development of renewable energy. Therefore, this program does not affect customers' scheduled tariff rates. All revenues and costs associated with this program stay with the program and do not go to the utility.

Funds received from participating customers under this program will cover program costs and match renewable energy purchases to block purchases. Funds not spent after covering program costs and matching renewable energy purchases may be used to fund "Qualifying Initiatives" such as solar panels installed on schools that are used for teaching renewable conservation.

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<sup>1</sup> In using the term "Audit" the Division notes that it did not conduct an independent audit as defined and conducted under Generally Accepted Auditing Standards as promulgated under the Auditing Standards Board of the American Institute of Certified Public Accountants. In this instance "Audit" means compliance review.

## **SCOPE OF THE AUDIT**

The Division performed the following audit procedures for the Company's 2021 Blue Sky program:

### **Revenues:**

- Reviewed recording procedures to get an understanding of the Blue Sky process and to trace Blue Sky revenue.
- Compared revenues to prior years and reviewed month-to-month trends in order to determine abnormal or specific areas that required additional review.
- Reviewed revenue accounts and compared balances with expected revenue calculations. Note material forecasting differences if found.
- Reviewed several revenue entries (including offsetting entries) and applicable supporting documentation. This is a general review to understand and to ensure revenue was accurately reported.

### **Disbursements/Expenses:**

- Reviewed recording procedures to get an understanding of the Blue Sky process and to trace Blue Sky expenses.
- Compared expenses to prior years and reviewed annual trends in order to determine abnormal or specific areas that required additional review.
- Reviewed several operating expenditures (including payroll), with applicable receipts, invoices, and statements, etc. This is a general review to understand and to ensure expenses were accurately reported.

### **Regulatory and Reporting Requirements:**

- Reviewed the 2021 Blue Sky Annual Report submitted to the Commission for completeness and accuracy as outlined in Rocky Mountain Power's Renewable Energy Rider Tariff Schedules 70 and 72 along with Commission orders.
- Reviewed revenue and expense accounts for propriety and proper regulatory reporting.
- Reviewed the most recent Tariff rates for compliance.
- Reviewed prior Commission Report & Orders for compliance.

## **AUDIT FINDINGS**

Information was provided to the Division through the data request process. The Company was responsive in supplying the Division with the requested documentation.

The Company's Utah Blue Sky program is relatively small compared to other Rocky Mountain Power programs. The scale of transactions reviewed was commensurate to the

size and complexity of the Blue Sky program. The Division utilized a judgmental rather than a statistical sample for review of expenses.

There are no Company assets or lease contracts assigned to the Blue Sky program; therefore, no review of plant, equipment, depreciation, or leasehold agreements was completed with the review.

Because of the nature of the Blue Sky program a traditional budget does not work. The Company annually forecasts annual program revenue assuming certain customer participation and block sales levels. Renewable Energy Credit (REC) expenses are also estimated based on anticipated block sales. A spending plan is developed based on these forecasts, working within the guideline that fixed expenses will need not exceed 30% of revenues. Fixed expenses include those associated with customer education and outreach, customer service energy program support, administration and product management. Revenues and expenses are monitored on a monthly basis.

**Revenues:**

The Blue Sky program is a voluntary program for customers interested in supporting the purchase and development of renewable energy in the State of Utah. The Division reviewed a sample of billing statements to ensure the tariff was correctly applied. The revenues appear to be properly stated.

**Disbursements/Expenses:**

The Company administers the Blue Sky program in six states, California, Oregon, Washington, Idaho, Wyoming, and Utah. Multiple invoices were reviewed and appear to be properly stated.

**Regulatory and Reporting Requirements:**

Based on a review of the Blue Sky tariff and other filings with the Commission, the Company appears to comply with regulatory and reporting requirements.

The Available Uncommitted Funds as of Dec. 2021, was \$4,460,908. The Division asked the Company if there were any plans to bring the balance down. The Company stated that they were holding the funds to cover the current high cost of RECs. In Dec. 2021, the Company filed tariff revisions to decrease the standard program block size from 200 kWh to

100 kWh<sup>2</sup>. With the approval of the block size reduction, the Company will open the funds for renewable project grants to spend the uncommitted funds.

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<sup>2</sup> Docket No. 21-035-T14 – Proposed Changes to Schedule Nos. 70 and 72, Renewable Energy Rider and Renewable Energy Rider Bulk Purchase.