

February 22, 2022

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. 22-035-T02
Rocky Mountain Power’s Proposed Tariff Changes to Electric Service Schedule
No. 137 – Net Billing Service for the Annual Update to the Exported Customer-
Generated Energy Credit Rates**

**Docket No. 21-035-64
Rocky Mountain Power’s Notice of Intent to Use Export Credit Rate Input
*Reply Comments***

On January 28, 2022, PacifiCorp, dba Rocky Mountain Power (the “Company”), submitted its first annual compliance filing to update the exported customer-generated energy credit rates (“ECR”) provided under Electric Service Schedule No. 137 – Net Billing Service (“Annual Update”) with the Public Service Commission of Utah (“Commission”). On February 2, 2022, the Commission issued a Notice of Filing and Comment Period (“Notice”) setting a deadline for interested parties to file comments on the above referenced matter. Per the Notice, comments were filed on February 14, 2022, by the Division of Public Utilities (“DPU”) and Utah Clean Energy (“UCE”).

Background

The Commission’s order (“Order”) issued in Docket No. 17-035-61 on August 11, 2021, requires the Company to submit an annual filing to the Commission to update the ECR provided under Electric Service Schedule No. 137, which is due 30 days before the March 1st effective date.

Summary of Interested Party Comments

DPU recommends the Commission approve the Company’s Annual Update with an effective date of March 1, 2022.

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UCE states that the Company's filing contains the information necessary to calculate the ECR and its inputs are consistent with the Order. UCE notes that "In the case of the 2022 Update, the change in value of the Export Credit Rate is driven by a change to the export profile input, and, again, it is unclear whether the new input is a more accurate measure of the value of Schedule 137 customer exports than the current export profile input.¹" UCE recommends:

1. The Company more clearly label whether all hourly data is presented in Pacific Standard Time or Pacific Daylight Time so that it is simpler to determine whether time zones are standardized, and data is time-correlated; and,
2. Future filings provide an export profile that includes customers with storage and an export profile that does not include customers with storage.

The Company respectfully submits these comments in response.

Company's Response to UCE

The Company agrees with the first recommendation to clearly label whether all hourly data is presented in Pacific Standard Time or Pacific Daylight Time. Pertaining to the second recommendation, the Company proposes that it not be required to include this information as part of the Annual Update filings as it is a departure for the Commission orders establishing the Annual ECR Update process.² This information could instead be requested through discovery at the time the Company files the required December 1 annual notices of intent.

Sincerely,



Joelle Steward

Senior Vice President, Regulation & Customer/Community Solutions

cc: Service List Docket Nos. 21-035-64 and 22-035-T02

¹ February 14, 2022 comments of Utah Clean Energy, page 2.

² See Docket No. 17-035-61, Public Service Commission of Utah October 30, 2020 Order and August 11, 2021 Order Approving annual Export Credit Rate Update Procedures.

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2022, a true and correct copy of Rocky Mountain Power's **Reply Comments** in Docket No. 21-035-64 was served by email on the following Parties:

Division of Public Utilities	
Madison Galt	mgalt@utah.gov
Utah Office of Consumer Services	
Alyson Anderson Bela Vastag Alex Ware	akanderson@utah.gov bvastag@utah.gov aware@utah.gov ocs@utah.gov
Assistant Utah Attorney General	
Patricia Schmid Justin Jetter Robert Moore	pschmid@agutah.gov jjetter@agutah.gov rmoore@agutah.gov
Utah Clean Energy	
Hunter Holman (C) Kate Bowman (C)	hunter@utahcleanenergy.org kate@utahcleanenergy.org
Rocky Mountain Power	
Data Request Response Center Emily Wegener Jana Saba	datarequest@pacificorp.com emily.wegener@pacificorp.com jana.saba@pacificorp.com ; utahdockets@pacificorp.com



Mary Penfield
Adviser, Regulatory Operations

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Assistant Utah Attorney General	
Patricia Schmid Justin Jetter Robert Moore	pschmid@agutah.gov jjetter@agutah.gov rmoore@agutah.gov
Rocky Mountain Power	
Data Request Response Center Emily Wegener Jana Saba	datarequest@pacificorp.com emily.wegener@pacificorp.com jana.saba@pacificorp.com ; utahdockets@pacificorp.com



Mary Penfield
Adviser, Regulatory Operations