



State of Utah

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February 25, 2022

Ms. Jana Saba
Rocky Mountain Power
1407 W North Temple, Suite 330
Salt Lake City, UT 84116

Data Request Response Center
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232

Re: *Rocky Mountain Power's Proposed Changes to Electric Service Schedule No. 137 – Net Billing Service for the Annual Update to the Exported Customer-Generated Energy Credit Rate; Docket No. 22-035-T02*

Dear Ms. Saba:

The Public Service Commission (PSC) reviewed Rocky Mountain Power's (RMP) January 28, 2022 tariff filing proposing revisions to Tariff P.S.C.U. No. 51, Electric Service Schedule No. 137 – Net Billing Service, Sheet No. 137.3 ("Schedule 137 Revisions"). Schedule 137 provides Exported Customer-Generated Energy Credit Rates (ECR) for, and the terms and conditions associated with, customers exporting energy to RMP. The Schedule 137 Revisions decrease the ECR customers will receive from 5.817 cents per kWh to 5.160 cents per kWh for June through September and 5.487 cents per kWh to 4.462 cents per kWh for October through May. RMP states the Schedule 137 Revisions are consistent with the calculation methodology approved in the PSC's orders issued in Docket No. 17-035-61 on October 30, 2020, December 23, 2020, and August 11, 2021 ("ECR Orders"). RMP requests an effective date of March 1, 2022 for the Schedule 137 Revisions. The Division of Public Utilities (DPU) filed comments on February 14, 2022. Utah Clean Energy (UCE) filed comments in a related docket, 21-035-64, on February 14, 2022. RMP filed reply comments on February 22, 2022.

DPU recommends the PSC approve RMP's proposed Schedule 137 Revisions. In making its recommendation, DPU comments that the Schedule 137 Revisions are as intended under the ECR Orders, and that it reached a result similar to the Schedule 137 Revisions in its own analysis. DPU ultimately states that the adjustments to the credit rates are routine, reasonable, and comply with PSC orders, and therefore are just and reasonable and in the public interest.

UCE comments that inputs provided by RMP in Docket No. 21-035-64 include the information necessary to calculate the ECR and are consistent with the ECR Orders. In addition, UCE makes two recommendations. First, UCE recommends RMP clearly label whether all hourly data is presented in Pacific Standard Time or Pacific Daylight Time so that it can be determined whether time zones are standardized, and data is time-correlated. Second, UCE recommends that RMP provide an export profile that includes customers with storage separately from an export profile that does not include customers with storage.

In its reply, RMP agrees to clearly label all data files filed in future ECR updates with relevant time stamps. RMP disagrees with UCE's second recommendation, and instead comments that UCE could request desired export profiles through discovery at the time RMP files any notice of intent to use an ECR input.

The PSC appreciates RMP's commitment to provide time labeled data in future ECR update filings. Regarding UCE's request for separate export credit profiles, RMP has committed to provide this data through discovery at the time RMP files any future notice of intent to use an ECR input. This commitment obviates the need for further consideration of UCE's recommendation at this time.

Based on the PSC's review of the Schedule 137 Revisions, DPU's comments and recommendations, UCE's comments, and RMP's reply comments, the PSC finds that the Schedule 137 Revisions comply with the calculation methodology set forth in the ECR Orders and approves the Schedule 137 Revisions, effective March 1, 2022.

Sincerely,

/s/ Gary L. Widerburg

PSC Secretary

DW#322472