

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

Rocky Mountain Power's Proposed Tariff Changes to Electric Service Schedule No. 300, Regulation Charges and Electric Service Regulation No. 5, Customer's Installation	<p style="text-align: center;"><u>DOCKET NO. 22-035-T04</u></p> <p style="text-align: center;"><u>ORDER</u></p>
--	---

ISSUED: March 1, 2022

BACKGROUND

On February 2, 2022, Rocky Mountain Power (RMP) filed Advice No. 22-02 (“Application”) with the Public Service Commission (PSC) proposing modifications to Electric Service Schedule No. 300 (“Schedule 300”) and Electric Service Regulation No. 5 – Customer’s Installation (“Regulation 5”) of its Tariff P.S.C.U. No. 51. RMP’s revised Regulation 5 requires a customer with a customer-owned below grade vault for company-owned electrical equipment (“Underground Station”) to design the Underground Station consistent with RMP standards, attain RMP pre-approval of an Underground Station design, enter the Underground Station only when escorted by an authorized RMP representative, and pay a monthly inspection and maintenance charge of \$300 (“Underground Station Maintenance Fee”) assessed on RMP’s revised Schedule 300. RMP requests an effective date of April 1, 2022 for its revised Schedule 300 and Regulation 5. In addition, RMP states that only new Underground Station customers¹ would be subject to its proposed Schedule 300 fee at this time.²

¹ RMP defines new below grade vault customers as those who execute a line extension electric service agreement or other applicable contract after March 31, 2022. *Rocky Mountain Power’s Proposed Tariff Changes to Electric Service Schedule No. 300 – Regulation Charges and Electric Service Regulation No. 5 – Customer’s Installation*, Docket No. 22-035-T04, Advice Letter No. 22-02 filed February 2, 2022, at 2.

² RMP adds that it may request that existing customers with accounts for underground stations be subject to the fee in the next general rate case proceeding. *See Application* at 2.

On February 3, 2022, the PSC issued a Notice of Filing and Comment Period. On February 17, 2022, the Division of Public Utilities (DPU) filed comments. No other party filed comments.

POSITIONS OF THE PARTIES

In support of its Application, RMP states that it is proposing the new \$300 fee on Schedule 300 based on the additional inspection and maintenance costs compared to above-ground stations. According to RMP, its costs to conduct an inspection of an underground station are an average of \$1,819 and required twice per year, while a visual inspection of above-ground equipment is \$12.78 and required every 10 to 20 years. RMP states that it calculated the amount of the fee based on the difference in inspection costs.

Based on its calculation of the fee and the type of customer to which the fee would apply, RMP asserts that the fee is reasonable, and aligns with cost causation principles. According to RMP, existing customers that would be subject to RMP's revised Schedule 300 and Regulation 5 typically have an average monthly bill of \$35,000,³ and, because the fee will only apply to new customers at this time, prospective customers can make an informed decision regarding the impact of the fee before installing an underground station.⁴

DPU comments that the revised Schedule 300 and Regulation 5 are just and reasonable, and recommends that the PSC approve them as filed. In support of its recommendation, DPU asserts that RMP's \$300 per month fee for underground vault inspections is supported by actual

³ For reference, the range of the average bill for existing customers with underground stations is \$8,000 to \$137,000 per month.

⁴ Application at 2, ¶ 3.

costs and occurrences over the past five years based on its analysis of RMP's average cost of inspecting a below-grade vault in downtown Salt Lake City.⁵ DPU adds that Underground Stations are becoming more common and differ from above-ground stations in complexity, ease of access, working clearance, heating, cooling, ventilation, and drainage.

DISCUSSION, FINDINGS, AND CONCLUSIONS

The PSC finds that RMP has demonstrated that its proposed Schedule 300 and Regulation 5 are reasonable, aligned with cost causation principles, and support the public interest. Underground Stations are more complex than above-ground stations, require annual inspections, and demand a more expensive inspection. DPU's calculations based on RMP responses to DPU data requests corroborate RMP's assertions that it calculated the Schedule 300 fee based on differences in inspection costs and inspection occurrences compared to above-ground stations. And the public interest requires that RMP frequently inspect the more complex Underground Stations to ensure safety and reliability.

Based on those findings, the PSC's review of RMP's Application, on DPU's comments and recommendation, and the absence of opposition or objection to the Application, the PSC concludes the proposed Tariff revisions are just, reasonable, and in the public interest. Accordingly, the PSC approves the Application as filed.

⁵ DPU's Comments at 3-4.

ORDER

- 1) The Application is approved as filed;
- 2) Filed Tariff Sheet No. 5R.1 and Tariff Sheet No. 300.1 are effective April 1, 2022.

DATED at Salt Lake City, Utah, March 1, 2022.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Ron Allen, Commissioner

Attest:

/s/ Gary L. Widerburg
PSC Secretary
DW#322525

Notice of Opportunity for Agency Review or Rehearing

Pursuant to Utah Code Ann. §§ 63G-4-301 and 54-7-15, a party may seek agency review or rehearing of this written order by filing a request for review or rehearing with the PSC within 30 days after the issuance of the order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the PSC fails to grant a request for review or rehearing within 30 days after the filing of a request for review or rehearing, it is deemed denied. Judicial review of the PSC's final agency action may be obtained by filing a Petition for Review with the Utah Supreme Court within 30 days after final agency action. Any Petition for Review must comply with the requirements of Utah Code Ann. §§ 63G-4-401, 63G-4-403, and the Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on March 1, 2022, a true and correct copy of the foregoing was delivered upon the following as indicated below:

By Email:

Data Request Response Center (datareq@pacificorp.com, utahdockets@pacificorp.com)
PacifiCorp

Jana Saba (jana.saba@pacificorp.com)
Emily Wegener (emily.wegener@pacificorp.com)
Rocky Mountain Power

Patricia Schmid (pschmid@agutah.gov)
Justin Jetter (jjetter@agutah.gov)
Robert Moore (rmoore@agutah.gov)
Utah Assistant Attorneys General

Madison Galt (mgalt@utah.gov)
Division of Public Utilities

Alyson Anderson (akanderson@utah.gov)
Bela Vastag (bvastag@utah.gov)
Alex Ware (aware@utah.gov)
(ocs@utah.gov)
Office of Consumer Services

Administrative Assistant