



SPENCER J. COX  
*Governor*

DEIDRE M. HENDERSON  
*Lieutenant Governor*

# UTAH DEPARTMENT OF COMMERCE

## Division of Public Utilities

MARGARET W. BUSSE  
*Executive Director*

CHRIS PARKER  
*Division Director*

## Memorandum

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Brenda Salter, Assistant Director  
Abdinasir Abdulle, Utility Technical Consultant Supervisor  
Justin Christensen, Utility Analyst

**Date:** July 17, 2023

**Re:** **Docket No. 23-035-15**, Rocky Mountain Power's Application to Revise Rates in Tariff Schedule 98, Renewable Energy Credits Balancing Account.

## Recommendation (Approval)

Based upon the Utah Division of Public Utilities (Division) review and audit of Rocky Mountain Power's (RMP) Renewable Energy Credits (RECs), the Division recommends that the Public Service Commission of Utah (Commission) approve the interim rates set under this docket as final.

## Issue

The Division hereby submits for filing the Division's Audit Report of the Rocky Mountain Power, Renewable Energy Credits Balancing Account (RBA).

## Discussion

On May 30, 2023, the Commission issued its Order approving RMP's proposed RBA on an interim basis pending the Division's audit report, with an effective date of June 1, 2023.

The Division reviewed numerous documents during its audit, including direct testimony, RMP's responses to Data Requests from the Division, the Office of Consumer Services,

Division of Public Utilities

Heber M. Wells Building • 160 East 300 South • P.O. Box 146751 Salt Lake City, UT 84114-6741  
[www.dpu.utah.gov](http://www.dpu.utah.gov) • telephone (801) 530-7622 • toll-free in Utah (877) 874-0904 • fax (801) 530-6512

and Utah Association of Energy Users, RMP REC sales, request for proposals, RMP reverse request for proposals, RMP REC revenue contracts, renewable costs in base rates, the REC budget for 2022 and 2023, REC policies and procedures, and previous RBA filings. The Division reviewed and verified that the fees billed by the Company to Kennecott complied with the confidential Non-Generation and REC Supply Agreement between Kennecott Utah Copper LLC and PacifiCorp, dated April 8, 2019. Based on this review, it appears the RBA is prudently managed and follows regulatory and reporting requirements.

## **Conclusion**

Based on a review of the associated 2022 REC tariff, Schedule 98, and related 2022 filings with the Public Service Commission of Utah, Rocky Mountain Power appears to be prudently managing the program overall. The program complies with regulatory and reporting requirements. RMP's corrections to Oct. Nov. and Dec. 2021 REC resource assignments of \$19,855, and compliance resource allocations to Rolling Hills and River Rock I of \$9,535, result in an understatement of Utah REC revenue of approximately \$30,000 is immaterial in amount (less than 1 percent) and does not affect the interim rates. RMP will include these corrections in next year's filing. Therefore, the interim rates appear to be in the public interest and should be made final.

cc: Jana Saba, Rocky Mountain Power  
Joelle Steward, Rocky Mountain Power  
Service List