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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: The Public Service Commission of Utah

From: The Office of Consumer Services

Michele Beck, Director
Béla Vastag, Utility Analyst

Date: May 12, 2023

Subject: Docket No. 23-035-20

**Application of Rocky Mountain Power for an Extension to the 2020
Inter-Jurisdictional Cost Allocation Agreement [MSP Extension]**

BACKGROUND

On April 12, 2023, Rocky Mountain Power (RMP) filed with the Utah Public Service Commission (PSC) a request for approval of a First Amendment to PacifiCorp's 2020 Inter-Jurisdictional Cost Allocation Agreement. The purpose of this amendment is to extend the end date of the existing agreement from December 31, 2023 to December 31, 2025. This agreement is also commonly referred to as the Multi-State Protocol or MSP.

On April 13, 2023, the PSC issued a Notice of Filing and Comment Period which set deadlines for interested parties to file comments as follows:

- Initial Comments – by May 12, 2023
- Reply Comments – by May 30, 2023

According to the PSC's schedule, the Utah Office of Consumer Services (OCS) submits the following comments on RMP's Application to extend the 2020 Inter-Jurisdictional Cost Allocation Agreement.

OFFICE OF CONSUMER SERVICES RECOMMENDS APPROVAL OF THE FIRST AMENDMENT TO THE 2020 MSP AGREEMENT, EXTENDING IT TO 12/31/2025

The OCS has been an active participant in PacifiCorp's Framework Issues Workgroup. This workgroup began regular meetings in approximately March 2020 to resolve the MSP Framework Issues and to develop a successor to the 2020 MSP Protocol. Unfortunately, progress has been slow and the workgroup has concluded that additional time is needed to resolve the outstanding issues. The OCS believes that this 2-year extension to the Agreement should provide sufficient time to resolve all necessary issues. As a result, the OCS signed the Amendment on March 28, 2023.

The OCS recommends that the PSC approve the proposed Amendment to the 2020 MSP Agreement, extending it another two years to December 31, 2025.

cc:

Joelle Steward and Jana Saba, PacifiCorp
Chris Parker, Division of Public Utilities
Email Service List