



## Public Service Commission

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## State of Utah

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*Lieutenant Governor*

February 23, 2023

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 Tariff Changes to Electric Service Schedule No. 137, Net Billing Service; Docket No. 23-035-T03*  
*Rocky Mountain Power's Notice of Intent to Use Export Credit Rate Input; Docket No. 22-035-54*

Dear Ms. Saba:

The Public Service Commission (PSC) reviewed Rocky Mountain Power's (RMP) December 1, 2022 Notice of Intent to use Export Credit Rate Inputs ("Notice") and its January 30, 2023 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"), effective March 1, 2023.

Schedule 137 provides the terms and conditions, including the exported customer-generated energy credit rates ("ECR"), associated with customers' exported energy to RMP. The Schedule 137 Revisions increase the ECR customers will receive for exported energy from 5.160 cents per kWh to 5.636 cents per kWh for June through September, and from 4.462 cents per kWh to 4.745 cents per kWh for October through May. RMP states the Schedule 137 Revisions are filed in accordance with the PSC's orders issued in Docket No. 17-035-61 on October 30, 2020, December 23, 2020, and August 11, 2021 ("ECR Orders"). The Division of Public Utilities (DPU) filed comments regarding the Notice December 30, 2022 and, along with Vote Solar, filed comments regarding the Schedule 137 Revisions on February 14, 2023.

DPU indicates the component explanations, and accompanying Workpaper A, and Confidential Workpaper B in the Notice fulfill the requirements set forth in the ECR Orders.

DPU concludes that RMP has adequately fulfilled the PSC's directive for RMP to provide stakeholders with the necessary input updates to determine the annual Schedule No. 137 ECR.

As to the proposed Schedule 137 Revisions, DPU recommends that the PSC approve them. DPU states it reviewed RMP's annual ECR update adjustments approved by the PSC in Docket No. 21-035-64 and those proposed in RMP's recent Notice. DPU determined the annual and routine adjustments made by RMP are appropriate, and indicated DPU reached a result similar to the Schedule 137 Revisions in its own analysis. DPU states that the adjustments to the ECR are routine, reasonable, and comply with PSC orders and, therefore, are just and reasonable and in the public interest.

Vote Solar commented on the increase of the solar integration charges that RMP incorporated into the ECR related to the Schedule 137 Revisions. While Vote Solar expressed concern that the integration charges were "not representative of the integration costs caused by smaller, geographically diverse distributed solar customers ...", Vote Solar recognized that the calculation followed the PSC's directive in its October 30, 2020 order. Accordingly, Vote Solar's only recommendation was that the PSC carefully review changes to RMP's Flexible Reserve Study in the future to determine whether the use of the integration costs calculation was appropriate for smaller, distributed generation systems.

The PSC appreciates the comments that were filed by both DPU and Vote Solar. Based on the PSC's review of the Notice, the Schedule 137 Revisions, as well as DPU's and Vote Solar's comments and recommendations, the PSC (1) acknowledges the Notice complies with the ECR Orders, and (2) finds that the Schedule 137 Revisions comply with the calculation methodology approved in the ECR Orders. The PSC therefore approves the Schedule 137 Revisions as filed, effective March 1, 2023.

Sincerely,

/s/ Gary L. Widerburg

PSC Secretary

DW#327096