

January 29, 2024

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

**RE: Docket No. 23-035-55
Rocky Mountain Power’s Notice of Intent to Use ECR Input**

**Docket No. 24-035-T03
Rocky Mountain Power’s Proposed Tariff Changes to Electric Service
Schedule No. 137, Net Billing Service**

PacifiCorp, dba Rocky Mountain Power, (“Company”) hereby respectfully submits its annual compliance filing to update the exported customer-generated energy credit rates (“ECR”) provided under Electric Service Schedule No. 137 – Net Billing Service (“Schedule 137”).

In accordance with the Public Service Commission of Utah (“Commission”) orders issued in Docket No. 17-035-61 on October 30, 2020, December 23, 2020, and August 11, 2021, Rocky Mountain Power is required to submit an annual filing to the Commission to update the ECR provided under Schedule 137, which is due 30 days before the target effective date. The following sections provide the information required in the Commission’s order in Docket No. 17-035-61 on August 11, 2021 (“ECR Update Order”).

I. Content and Scope

Per the ECR Update Order, Table 1 below contains the scope and content of the ECR Update. This table was also provided with the Company’s December 1, 2023, Notice of Intent to use ECR Input (“ECR Notice”). The source data is based on the twelve months ended June 30, 2023. There were no changes to the inputs identified in the ECR Notice and all updates are classified as routine as determined in the ECR Update Order. The Company includes two workpapers with this filing. Workpaper A contains the calculation of the ECR along with the export profile data and Energy Imbalance Market (“EIM”) data. Confidential Workpaper B provides the hourly Utah load and is unchanged from the December 1, 2023, ECR Notice filing.

TABLE 1

Annual Update Input	Element(s)	Update Frequency	Location of Information
Export Profile	Energy / Capacity Contribution / Export Volume	Annual	Workpaper A
EIM Prices	Energy	Annual	Workpaper A
Line Losses	Energy / Capacity	Most recent GRC	Docket No. 20-035-04
Integration Cost	Integration	Most recent IRP	Docket No. 23-035-10
Hourly Utah Load	Capacity Contribution	Annual	Confidential Workpaper B
Generation Capital Cost	Generation Capacity	Future Proceeding	Not Updated
Generation Carrying Charge	Generation Capacity	Future Proceeding	Not Updated
Generation Fixed O&M	Generation Capacity	Future Proceeding	Not Updated
OATT Transmission Rate	Transmission Capacity	Annual	FERC Docket ER11-3643
Distribution Capital Cost	Distribution Capacity	Future Proceeding	Not Updated
Distribution Carrying Charge	Distribution Capacity	Future Proceeding	Not Updated

The **Export Profile** reflects an average value from all customers enrolled in Schedule 136.¹ To control for changes in customer count, export volumes will be reported as an average for the customers participating on each calendar day of the historical period. This produces weighted-average exports for a single typical customer. The historical period for the Annual Update is the twelve months ending June 2023.

Export volume per kW of installed capacity is calculated by dividing average annual export volumes by the average installed customer generation capacity, and reflects the same export profile described above and used to determine avoided energy costs and capacity contribution.

¹ The Company does not install metering that can capture interval data for Schedule 137 customers.

Energy Imbalance Market (“EIM”) Prices reflect 15-minute PacifiCorp East EIM Load Aggregation Point values reported by the California Independent System Operation (“CAISO”) for the twelve months ending June 2023.

Line Losses for energy, generation capacity, and transmission capacity costs, are calculated from generation input to the line transformer segment. For distribution capacity, line losses are calculated as the ratio of grossed up demand up to the line transformer segment to grossed up demand on the transmission system. Line loss values are consistent with the line loss study used to develop the rates approved by the Commission in the Company’s most recent general rate case (Docket No. 20-035-04).

Integration Costs reflect values identified for solar resources in the Company’s most recently filed Integrated Resource Plan (IRP). The Company’s 2023 IRP did not report an updated solar integration cost for calendar year 2023, but does identify a value from the 2021 IRP for that year, which the Company intends to apply in the Annual Update.²

Capacity Contribution is calculated as the average of the customer generation export profile during hours in the top 10% of Utah load for the same historical period (12 months ending June 2023). The Commission adopted the same method for generation, transmission, and distribution, so they all use the same capacity contribution value in the Annual Update.

Generation capacity cost is calculated from six inputs and the Company is not proposing any changes to generation cost inputs (items 1-3) as part of the Annual Update. Items 4-6 will be updated as previously described.

1. Generation capital cost,
2. Generation carrying charge,
3. Generation fixed operations and maintenance (O&M) cost,
4. Avoided line losses (cumulative losses from generation to the line transformer segment),
5. Generation capacity contribution, and
6. Export volume per kilowatt (kW) of installed capacity.

Transmission capacity cost is calculated from four inputs, all of which will be updated as part of the Annual Update. The transmission cost input (item 1) is described below, while Items 2-4 will be updated as previously described.

1. Open Access Transmission Tariff (OATT) rate,
2. Avoided line losses (cumulative losses from generation to the line transformer segment),
3. Transmission capacity contribution, and
4. Export volume per kW of installed capacity.

The **OATT transmission rate** is updated annually, in accordance with a Federal Energy Regulatory Commission (FERC) approved formula established in docket ER11-3643. The projected rate effective on June 1, 2023, is \$37.10/kilowatt-year.³

² The Company’s 2023 Integrated Resource Plan was filed in Docket No. 23-035-10 and is available online at: <https://pscdocs.utah.gov/electric/23docs/2303510/3281812023IRPFnlVlm15-31-2023.pdf>

Distribution capacity cost is calculated from five inputs and the Company is not proposing any changes to distribution cost inputs (items 1-2) as part of the Annual Update. Items 3-5 will be updated as previously described.

1. Distribution capital cost,
2. Distribution carrying charge,
3. Avoided line losses (the ratio of grossed up demand up to the line transformer segment to grossed up demand on the transmission system),
4. Distribution capacity contribution, and
5. Export volume per kilowatt (kW) of installed capacity.

II. Schedule

The ECR Update Order also determined that for routine updates, the Annual Update schedule would include a target effective date of March 1, 2024, with a comment deadline of 15 calendar days after the filing. Also, Rocky Mountain Power is required to submit an annual notice of intent to use any calculation, input, or workpaper not publicly available in a federal or state forum no later than December 1 before any Annual Update where the Company uses the calculation, input, or workpaper to determine the ECR. The required Notice of Intent was filed on December 1, 2023.

III. New ECR Rates

Based on the inputs described above, the new ECR rates have been calculated and provided in the attached workpaper A. A summary of the impact to the various inputs is provided in Table 2 below.

TABLE 2

Export Profile				
Season	Jan. 2024	Jan. 2023	% Change	
Export Profile				
Volume (kWh per kW)	Annual	729	870	-16%
Capacity Contribution (%)	Annual	14.37%	15.19%	-5%
Value by Element (cents/kWh)				
Energy Including integration & losses	Summer	4.984	3.215	55%
	Winter	3.641	2.325	57%
	<i>Annual (i)</i>	<i>4.208</i>	<i>2.669</i>	<i>58%</i>
Generation Capacity	Annual	1.760	1.559	13%
Transmission Capacity	Annual	0.776	0.688	13%
Distribution Capacity	Annual	0.196	0.173	13%
Total	Summer	7.715	5.636	37%
	Winter	6.372	4.745	34%
	<i>Annual (i)</i>	<i>6.939</i>	<i>5.089</i>	<i>36%</i>

(i) Annual values for information only and reflect seasonal weighting from the historical period.

³ Details on the annual transmission rate update are available online at: www.oatioasis.com/ppw/. From the sidebar, select PacifiCorp OASIS Tariff/Company Information >> OATT Pricing >> 2023 Transmission Formula Annual Update.

The updated export credit rate is 37% higher in the summer months (June through September) and 34% higher in the winter (October through May). This change is primarily a result of higher energy values, as well as a lower solar integration cost. While the capacity contribution declined, the average delivered volume declined by a greater amount, resulting in an increase to the generation, transmission, and distribution capacity values on a per kWh basis. Transmission cost is updated annually based on the Company's most recent Open Access Transmission Tariff (OATT) rate, but in the current update the change was negligible.

IV. Tariff Changes

Enclosed for filing by PacifiCorp, d.b.a. Rocky Mountain Power ("the Company"), is a tariff sheet associated with Tariff P. S. C. No. 51 applicable to electric service in the state of Utah. Pursuant to the requirement of Rule R746-405-2(D), the Company states that the proposed tariff sheet does not constitute a violation of state law or Commission rule. The tariff sheet attached herein contains the ECR Updates presented in this filing and reflect a proposed effective date of March 1, 2024.

Fourth Revision of Sheet No. 137.3	Schedule 137	Net Billing Service
------------------------------------	--------------	---------------------

Informal questions may be directed to Jana Saba, Regulatory Manager at (801) 220-2823.

Sincerely,



Joelle Steward
Senior Vice President, Regulation and Customer & Community Solutions

CC: Service List - Docket No. 23-035-55

CERTIFICATE OF SERVICE

Docket No. 23-035-55

I hereby certify that on January 29, 2024, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov
ocs@utah.gov

Division of Public Utilities

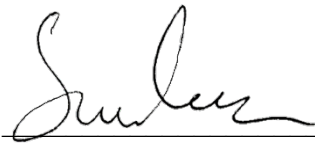
dpudatarequest@utah.gov

Assistant Attorney General

Patricia Schmid pschmid@agutah.gov
Robert Moore rmoore@agutah.gov
Patrick Grecu pgrecu@agutah.gov

Rocky Mountain Power

Data Request Response Center datarequest@pacificorp.com
Jana Saba jana.saba@pacificorp.com
utahdockets@pacificorp.com



Santiago Gutierrez
Coordinator, Regulatory Operations

Proposed Tariffs

MONTHLY BILL: Energy charges for electricity consumption shall be computed in accordance with a Customer's applicable standard service tariff. Credits for Exported Customer-Generated Energy, if any, shall be computed at the following rates. Regardless of whether the Customer exports net generation during the month, the Customer shall be billed the minimum monthly amount from the applicable standard service tariff. All other charges shall be calculated in accordance with the Customer's applicable standard service tariff.

Exported Customer-Generated Energy Credit Rates:

Billing Months – June through September inclusive

~~5.63~~ 67.715¢ per kWh for all exported kWh

Billing Months – October through May inclusive

~~4.74~~ 56.372¢ per kWh for all exported kWh

SPECIAL CONDITIONS:

1. Applications for service under this schedule will be subject to the following fees, in addition to any other applicable charges in Public Service Commission Rule R746-312-13:
 - a) Interconnection review request (non-refundable):
 - Level 1 - \$60 per application
 - Level 2 - \$75 per application plus \$1.50 per kilowatt of installed capacity
 - Level 3 - \$150 per application plus \$3.00 per kilowatt of installed capacity
2. Energy Charges in the applicable standard service tariff shall be computed from the total purchased Energy for the billing period.
3. The credit value in dollars computed for the Exported Customer-Generated Energy will be applied against the Power and Energy Charges on the Customer's monthly bill. Excess credits will carry-over to the next monthly bill during the Annualized Billing Period.
4. All unused credits accumulated by the customer-generator shall expire with the regularly scheduled meter reading at the conclusion of the Annualized Billing Period.
5. The customer-generator shall provide at the customer's expense all equipment necessary to meet applicable local and national standards regarding electrical and fire safety, power quality, and interconnection requirements established by the National Electrical Code, the Institute of Electrical and Electronics Engineers, and Underwriters Laboratories.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. ~~2324~~ 2324-035-~~T03T03~~

FILED: January ~~29~~ 30, 202~~4~~ 3

EFFECTIVE: March 1, 202~~4~~ 3

MONTHLY BILL: Energy charges for electricity consumption shall be computed in accordance with a Customer's applicable standard service tariff. Credits for Exported Customer-Generated Energy, if any, shall be computed at the following rates. Regardless of whether the Customer exports net generation during the month, the Customer shall be billed the minimum monthly amount from the applicable standard service tariff. All other charges shall be calculated in accordance with the Customer's applicable standard service tariff.

Exported Customer-Generated Energy Credit Rates:

Billing Months – June through September inclusive
7.715¢ per kWh for all exported kWh

Billing Months – October through May inclusive
6.372¢ per kWh for all exported kWh

SPECIAL CONDITIONS:

1. Applications for service under this schedule will be subject to the following fees, in addition to any other applicable charges in Public Service Commission Rule R746-312-13:
 - a) Interconnection review request (non-refundable):
 - Level 1 - \$60 per application
 - Level 2 - \$75 per application plus \$1.50 per kilowatt of installed capacity
 - Level 3 - \$150 per application plus \$3.00 per kilowatt of installed capacity
2. Energy Charges in the applicable standard service tariff shall be computed from the total purchased Energy for the billing period.
3. The credit value in dollars computed for the Exported Customer-Generated Energy will be applied against the Power and Energy Charges on the Customer's monthly bill. Excess credits will carry-over to the next monthly bill during the Annualized Billing Period.
4. All unused credits accumulated by the customer-generator shall expire with the regularly scheduled meter reading at the conclusion of the Annualized Billing Period.
5. The customer-generator shall provide at the customer's expense all equipment necessary to meet applicable local and national standards regarding electrical and fire safety, power quality, and interconnection requirements established by the National Electrical Code, the Institute of Electrical and Electronics Engineers, and Underwriters Laboratories.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. 24-035-T03