



State of Utah

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Public Service Commission

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Commissioner

JOHN S. HARVEY, Ph.D.
Commissioner

June 13, 2024

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 Revisions to Electric Service Schedule No. 37, Avoided Cost Purchases from Qualifying Facilities*, Docket No. 24-035-T04

Dear Ms. Saba:

The Public Service Commission (PSC) reviewed the May 15, 2024 Tariff Filing¹ ("Filing") submitted by Rocky Mountain Power (RMP). The Filing: (1) revises RMP's Electric Service Schedule No. 37 ("Schedule 37"), Avoided Cost Purchases from Qualifying Facilities Sheet Nos. 37.4 through 37.7; (2) incorporates the March 29, 2024 Official Forward Price Curve and the preferred portfolio from RMP's 2023 IRP Update, filed on April 1, 2024; and (3) revises the rates for base load, fixed solar, tracking solar, and wind facilities.

The Division of Public Utilities (DPU) submitted comments on June 3, 2024 recommending the PSC approve RMP's revisions to Schedule 37. No other party filed comments and no party filed reply comments. DPU comments that changes in macroeconomic conditions continue to impact Schedule 38² quarterly updates since last year's Schedule 37 revisions, and electricity market prices and wind/solar integration costs continue to influence the Official Forward Price Curve. Additionally, DPU states RMP's transition from its Generation and Regulation Initiative Decision

¹ On April 30, 2024, the PSC granted RMP's April 26, 2024 request for an extension of the April 30, 2024 filing deadline to May 15, 2024 to allow it time to incorporate the 2023 IRP Update preferred portfolio using the PLEXOS model for determining avoided costs.

² Schedule 38 applies to owners of existing or proposed Qualifying Facilities with a design capacity greater than 1,000 kW for a Cogeneration Facility or greater than 3,000 kW for a Small Power Production facility who desire to make sales to the Company, and to QFs who are not able to obtain pricing under Schedule 37 because the Schedule 37 cap has been reached.

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Tool (GRID) model to the PLEXOS model for its avoided cost pricing calculations may contribute to the price changes. DPU compares in Table 1 GRID and PLEXOS model results in price changes and plans to monitor them over time as RMP continues its transition. DPU states it identified no significant issues with the changes or calculations and comments the revisions are consistent with the requirements set forth in the PSC's February 12, 2009 Order in Docket No. 08-035-78³ and its November 28, 2012 Order in Docket No. 12-035-T10⁴. According to DPU, the proposed revisions are just, reasonable, and in the public interest. DPU recommends the PSC approve the Filing, effective June 15, 2024.

Based on the PSC's review of the Filing and DPU's recommendation, and there being no opposition, the PSC approves RMP's proposed changes to Schedule 37 as filed, effective June 15, 2024.

Sincerely,

/s/ Gary L. Widerburg
PSC Secretary
DW#334268

³ In its February 12, 2009 Order in Docket No. 08-035-78 (at page 24, ¶ 2), the PSC required RMP to update the avoided cost pricing in Schedule 37 annually, concurrent with the approval and establishment of rates for larger commercial and industrial customers based on the FERC Form No. 1 method, consistent with the updating requirements for the FERC Form No. 1 method.

⁴ In its November 28, 2012 Order in Docket No. 12-035-T10 (at page 7, ordering paragraph 2), the PSC required RMP to file future annual proposed rates for Schedule 37 within 30 days of filing its IRP or IRP Update or by April 30 of each year, whichever occurs first.