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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Brenda Salter, Assistant Director
Doug Wheelwright, Utility Technical Consultant Supervisor
Matthew Pernichele, Utility Technical Consultant

Date: May 22, 2025

Re: **Docket No. 25-035-T04** Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Schedule No. 31, Partial Requirements Service – Large General Service – 1,000 kW and Over

Recommendation (Approval)

The Division of Public Utilities (the Division) has examined PacifiCorp Utah's (the Company) proposed changes to Electric Service Schedule No. 31¹ (the Proposed Tariff). The Utah Public Service Commission (the Commission) should approve the Proposed Tariff because it more accurately reflects the actual costs caused by the affected customers.

Background

On May 7, 2025, the Company filed its Proposed Tariff and the Commission issued an Action Request² asking the Division to investigate. On May 8, 2025, the Commission Issued a Notice of Filing and Comment Period³ giving parties until May 22, 2025, to file comments and May 29, 2025, to file reply comments.

¹ Tariff, May 7, 2025.

² Action Request, May 7, 2025.

³ Notice of Filing and Comment Period, May 8, 2025.



The Division reviewed the Proposed Tariff and existing tariffs and held a call (the Call) to discuss the matter with the Company and the Utah Office of Consumer Services on May 13, 2025.

Discussion

Proposed Tariff Change

Schedule 31, Partial Requirements Service – Large General Service- 1,000 kW and Over, of the Company's tariff provides various types of back up power to customers who would otherwise qualify for Schedule 8 or 9 but generate at least 1 MW but not more than 15 MW of their own electricity.

The Company proposes modifying Schedule 31 to accommodate customers who generate more than 15 MW and require Station Service of 15 MW or less. Station Service is a type of backup power that a generator uses to restart after it stops generating electricity.⁴ Station Service does not replace all the power that the generator normally produces nor serve the other load that a generator would normally serve. On the Call, the Company explained that most customers with a generation capacity higher than Schedule 31's current 15 MW limit would likely need much less than 15 MW of Station Service. The Company used the example of a 200 MW generator that may only require 1 MW of Station Service in the event of an outage.

The Company stated that this change should reduce costs for current or potential customers who generate more than 15 MW of power but need less than 15 MW of Station Service. The Company referred to an increase in the number of customers interested in generating power and a potential increase in power disruptions for potential and existing customers from Public Safety Power Shut Offs and other factors which could require the use of Station Service more often than in the past.

Due to Schedule 31's 15 MW cap, these customers would currently be on Schedule 9, which is for customers purchasing large amounts of power at transmission voltages, over 46,000 volts. The Company proposes changing Schedule 31's 15 MW cap to apply to the customer's required Station Service instead of its generating capacity. This more accurately

⁴ Tariff, May 7, 2025, Original Sheet No. 31.6.

reflects these customers' system costs because they are using only the smaller amount of Station Service and very intermittently. In the event of an outage, customers using Schedule 9 for Station Service would potentially be subject to large power and energy charges. The Company stated that the current tariff would be more expensive for customers than service through the Proposed Tariff. Under the Proposed Tariff, a customer requiring more than 15 MW of Station Service would be served through a special contract. The Company stated that it is only aware of two current customers who would be affected by the Proposed Tariff.

Overlapping Filings

The Company filed the Proposed Tariff as changes to P.S.C.U. No. 51, which is the version of its tariff currently in effect. P.S.C.U. No. 51 is subject to change by the Company's filing in Docket No. 25-035-T05 (GRC Tariff), in which the Company proposes revisions to its tariffs resulting from its latest General Rate Case in Docket No. 24-035-04. As filed, if the Proposed Tariff and the GRC Tariff are both approved by the Commission, the rates for Schedule 31 could revert to the P.S.C.U. No. 51 rates and conditions on August 1, 2025. On the Call, the Company stated that it is aware of this situation and will modify its remaining filing to accommodate whichever of these dockets is approved first.

Conclusion

The Proposed Tariff would allow generating customers to access up to 15 MW of Station Service under Schedule 31 instead of Schedule 9. The Division recommends the Commission approve the Proposed Tariff because it better reflects the actual costs that these customers impose on the system.

cc: Joelle Steward, RMP
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