



State of Utah

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Commissioner

June 3, 2025

Mr. Max Backlund
Rocky Mountain Power
1407 West 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. 31, Partial Requirements Service – Large General Service – 1,000 kW and Over, Docket No. 25-035-T04*

Dear Mr. Backlund:

The Public Service Commission of Utah ("PSC") reviewed the May 7, 2025 filing by Rocky Mountain Power ("RMP") proposing changes ("Tariff Revisions") to Electric Service Schedule No. 31 ("Schedule 31"). The Schedule 31 Tariff Revisions contemplate Sheet Nos. 31.1, 31.6, 31.7, with an accompanying modification to Tariff Index Sheet No. B. RMP requests an effective date of August 1, 2025.

RMP states it has received an increase in requests for Schedule 31 Station Service¹ from customers whose primary enterprise is power generation. According to the provisions of Schedule 31, RMP must ensure Station Service to Schedule 31 customers without prior notice in the event onsite generation becomes unavailable. Currently, RMP limits Schedule 31 service to customers with on-site generation between 1,000 kW and 15,000 kW as a measure to limit the impacts to system of planning and service delivery, and negotiates on a case-by-case basis with customers requesting greater levels of on-site generation. RMP believes it is reasonable for the 15,000 kW cap for Station Service customers seeking service under Schedule 31 to apply to that level of Station Service load rather than the level of the on-site generation.

¹ Traditional Schedule 31 customers include commercial or industrial customers that use energy generated on-site to supply a portion of their own electricity needs. Schedule 31 supplies the electricity these customers request for supplementary power, backup power, maintenance power, or excess service ("Station Service").

RMP explains that should a Station Service customer's on-site generation become unavailable, the customer would require supplementary service at the level of its Station Service load rather than all the customer's on-site generation. The tariff's binding requirement on RMP to intermittently serve Schedule 31 customers with no notice creates additional risks with larger loads. Limiting the Station Service load served for a customer under Schedule 31 to 15,000 kW provides consistency with more traditional partial requirements customers that are limited to 15,000 kW of on-site generation. In RMP's experience, the Station Service needs of most generators are easily met within this load limit. RMP's proposed modifications to Schedule 31 also adds Station Service as a defined term to the tariff.

The PSC also reviewed the comments of the Division of Public Utilities (DPU) and the Office of Consumer Services (OCS) filed on May 22, 2025. No other comments were filed, and RMP filed reply comments on May 29, 2025 ("RMP Reply Comments").

DPU recommends the PSC approve the Schedule 31 Tariff Revisions because the Station Service required to supplement load rather than the level of the on-site generation better reflects the actual costs that these customers impose on the system. DPU comments it discussed with RMP the fact that, as filed, the Tariff Revisions may become incompatible with RMP's 2024 general rate case tariff compliance filing currently pending PSC review,² given the requested August 1, 2025 effective date. DPU states RMP will modify its remaining filing to accommodate whichever of the two dockets is approved first.

OCS agrees with RMP that Station Service appears similar to the supplementary service provided under Schedule 31. Additionally, it appears the number of customers this change potentially impacts is "very small," therefore OCS recommends the PSC approve the Schedule 31 Tariff Revisions. OCS also requests RMP provide additional information on the number of power plant customers in its service area potentially affected or covered by this change, the number of power plant customers not covered by this change (*i.e.*, below 1 MW or greater than 15 MW), the Station Service load each of these customers would require, on average how many times a year a typical power plant customer may require retail station service, and a list of reasons or issues why these customers now potentially need more frequent retail station service from RMP.

According to the RMP Reply Comments, RMP is uncertain as to the number of customers that would ultimately pursue this option if the PSC approves the Schedule

² *Rocky Mountain Power's Filing to Comply with the PSC's Order Issued on April 25, 2025 in Docket No. 24-035-04, Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations*, Docket No. 25-035-T05.

31 Tariff Revisions. RMP anticipates that the number of Station Service customers served under Schedule 31 would be small. RMP adds it does not currently have data on independent power producers in its Utah service territory that would be adequate to answer OCS's questions. RMP explains it based its recommended 1 – 15 MW load limit of Station Service on the risks inherent in the requirement for RMP to serve Schedule 31 customers with no notice and was not based on an analysis of the anticipated needs of Station Service customers. In its experience, RMP concludes the Station Service requirements of most generators would not exceed this load limit. Recognizing it was unable to answer all OCS's questions, RMP asserts the appropriate safeguards are in place with the proposed 1 – 15 MW load limit and that the Schedule 31 Tariff Revisions are reasonable and in the public interest.

The PSC appreciates RMP's responses and is satisfied with the explanations contained in the RMP Reply Comments and by DPU's representation that RMP will modify its tariff to address the potential overlapping of tariff compliance raised in DPU Comments. Based on the PSC's review of the Schedule 31 Tariff Revisions, the comments and recommendations from DPU and OCS, the RMP Reply Comments, and there being no opposition, the Schedule 31 Tariff Revisions are approved. Accordingly, we approve the Schedule 31 Tariff Revisions as filed, effective August 1, 2025.

Sincerely,

/s/ Gary L. Widerburg
PSC Secretary
DW#340029