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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
Abdinasir Abdulle, Utility Technical Consultant Supervisor
Trevor Jones, Utility Technical Consultant

Date: July 3, 2025

Re: **Docket No. 25-035-T09**, Rocky Mountain Power's Proposed Tariff Changes to Electric Service Schedule No. 74, Renewable Energy Credit Option Program (Pilot Program)

Recommendation (Approve Tariff Sheets)

The Division of Public Utilities ("Division") has reviewed Rocky Mountain Power's ("Company") Tariff Schedule 74 revision filed on June 19, 2025. The Division recommends that the Public Service Commission ("Commission") approve the tariff revisions as filed.

Discussion

The purpose of this filing is to update the newly approved Schedule 74 with some clarifying language for the first Special Condition. The current language is vague and has resulted in multiple customer inquiries. The revision is within the first sentence, which is as follows:

Current Language Special Condition No. 1

On behalf of the participants of the Program, the Company will retire RECs from contracted or Company-owned Renewable Resources equal to the aggregated load for participating customers multiplied by a percentage of renewable resource generation from PacifiCorp's system.



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Proposed Modification Special Condition No. 1

On behalf of the participants of the Program, the Company will retire RECs from contracted or Company-owned Renewable Resources equal to the aggregated load for participating customers multiplied by **20 percent, which is equal to the approximate** a percentage of renewable resource generation from PacifiCorp’s ~~system~~ **owned and contracted resources**.

This change is in line with what was mentioned by Company witness Craig M. Eller in his Direct Testimony filed in Docket No. 24-035-04 (the general rate case or GRC) on June 28, 2024, lines 219 through 231, where the Company proposed to set an initial percentage of 20 percent for the first program year. In a data request response¹, the Company stated, “The Company chose this number as it reasonably approximates the percentage of renewable energy in the Company’s resource portfolio...”

“The data the Company reviewed in determining the 20 percent figure is provided as Confidential Attachment DPU 1.4.” The Company’s confidential table is provided below:

[REDACTED]			
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]
[REDACTED]			[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹ DPU Data Request 1.4 and Response is attached.

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While reaching the proposed 20 percent requires multiple assumptions, the figure was ultimately approved in the GRC. The Company's response to DPU data request 1.4 states "the 20 percent will be used as the initial percentage and reviewed annually for subsequent program years." Consequently, the Division recommends approval of the Company's proposed tariff change and expects more granularity in the future.

Conclusion

The Division recommends the Commission approve the tariff proposal based on the 20 percent figure approved in the GRC.

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