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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  
David Williams, Utility Technical Consultant  
Matthew Pernichele, Utility Technical Consultant

**Date:** October 30, 2025

**Re:** **Docket No. 25-035-T12**, Proposed Tariff Changes Related to Rocky Mountain Power's Time of Use Programs

## Recommendation (Approval)

The Utah Division of Public Utilities (Division) recommends that the Utah Public Service Commission (Commission) approve Rocky Mountain Power's (Company) tariff changes proposed in this docket.

## Issue

The Company is seeking Commission approval of four revisions to some of its TOU tariffs. The Company proposes to make the implementation date of the tariffs flexible, change Schedule 6A time-of-use (TOU) prices based on newly available data from advanced metering infrastructure (AMI), correct Schedule 10 TOU rates, and add language to clarify how billing will work for net metering customers who are also on a TOU schedule.

## Implementation Date

Under the terms of the cost-of-service stipulation in the Company's last general rate case (Phase II Stipulation), all residential TOU customers were to be moved into the newly approved Schedule 1 TOU pilot program on December 1, 2025.<sup>1</sup> The Company proposes to

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<sup>1</sup> *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*



Division of Public Utilities

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change this date to “on or around December 1, 2025”<sup>2</sup> because reprogramming the billing system will take approximately two weeks, but the exact time required is unknown.

A customer would not be charged significantly more if they were moved from Schedule 2 to Schedule 1 TOU either a few days earlier or a few days later than December 1, 2025. A customer who is moved from Schedule 2 to the new Schedule 1 TOU program will see the price differential between on-peak and off-peak usage increase as the on-peak energy charge will go up and the off-peak charges will go down. Any effect from this should be offset in a customer’s total bill by: (1) the on-peak period shortening from 1 PM until 8 PM (7 hours) under Schedule 2, to 6 PM until 10 PM (4 hours) under the Schedule 1 TOU option, and (2) the lack of an inclining block in the Schedule 1 TOU program.

No stakeholders opposed this change when it was discussed during the September 24, 2025, workshop.

## **Schedule 6A Price Changes**

The Phase II Stipulation adopted all of the cost-of service changes proposed in the Company’s direct testimony that were not changed within the stipulation itself.<sup>3</sup> At the Commission’s request, the Company filed a list of the approved changes that were not described in the Phase II Stipulation (Stipulation Clarification).<sup>4</sup> This list included adjustments to Schedule 6A on December 1, 2025, to be determined once the Company had a year’s worth of hourly usage data from its AMI. The Company’s proposed changes to Schedule 6A include changes to the time of use periods that were approved in the rate case and pricing newly calculated using the hourly AMI data.

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No. 25-035-04, Phase II Settlement Stipulation, p. 3, (January 14, 2025) (hereinafter, Phase II Stipulation). Approved by the Commission in *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. 25-035-04, Order, p. 115 (April 25, 2025).

<sup>2</sup> Application, p. 2.

<sup>3</sup> Phase II Stipulation, p. 10.

<sup>4</sup> *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. 25-035-04, Settlement Stipulation – Phase II – Supplemental Exhibit on Uncontested Issues and Illustrative Rate Spread Comparisons, (January 24, 2025).

The Company proposes slight reductions in the first and second block of energy rates based on better data from the AMI system<sup>5</sup> and a 66% reduction in the discount for power used off-peak.<sup>6</sup> The on-peak period is to be reduced from 7 AM to 11 PM to 6 PM to 10 PM.<sup>7</sup> These changes comply with the order in the rate case and should be accepted.

The Company also changed the implementation date of these changes to “on or around 11/30/2025” for the similar reasons as described above. The Division does not oppose this change.

### **Schedule 10 Price Changes**

The Company proposes slightly increasing the Schedule 10 TOU pricing to fix an error in a previous tariff filing (July Filing).<sup>8</sup> The Phase II Stipulation changed the on-peak hours for the Schedule 10 TOU option from 7 AM until 11 PM to 4 PM until 10 PM to better reflect market pricing.<sup>9</sup> This change will go into effect on December 1, 2025.<sup>10</sup> The Company explained, via an email discussion with the Division, that the price changes proposed in the July Filing were calculated using the on-peak hours from the previous tariff, not the shorter on-peak hours that will be effective on December 1, 2025. These prices have increased slightly to account for the shorter on-peak period and estimated lower volume of sales at on-peak prices. The Division recommends that the Commission approve the corrected Schedule 10 TOU prices because they more accurately reflect the intent of the Phase II Stipulation and the Commission’s order in the general rate case.

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<sup>5</sup> *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. 25-035-04, Direct Test. of Robert M. Meredith, p.43 (June 28, 2024) (hereinafter, Meredith Direct Test.).

<sup>6</sup> Phase II Stipulation, p. 5.

<sup>7</sup> The updated time-of-use periods were originally proposed in Meredith Direct Test. line 810, table 7. This is incorporated into the Phase II Stipulation on p. 5.

<sup>8</sup> *Rocky Mountain Power’s Filing in Compliance with the PSC’s Order Issued on June 26, 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-T10 (July 3, 2025).

<sup>9</sup> Meredith Direct Test. p. 45.

<sup>10</sup> Stipulation Clarification, p. 2.

## **Schedule 135 Clarifying Language**

The Division recommends that the Commission approve Company's proposed additions to the language of Schedule 135 because the new language explains the complex and potentially confusing procedure for valuing and applying net metering energy credits to a TOU customer's bill. These credits are meant to compensate customers for energy they send to the Company's system from small scale renewable generation or other sources. This change addresses stakeholders' concerns brought up during a workshop on September 24, 2025.<sup>11</sup> These changes should increase customer acceptance of the Company's net metering program and allow customers to better evaluate whether to participate in it.

## **Conclusion**

The Division recommends the Commission approve the proposed tariff changes, as the tariff changes proposed in this docket are reasonable and in the public interest.

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<sup>11</sup> Tariff, p. 2. No transcript or recording of this workshop exists in the record.