



Joelle R. Steward
Vice President, Regulation
1407 West North Temple, Suite 330
Salt Lake City, UT 84116

October 14, 2021

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Wyoming Public Service Commission
2515 Warren Avenue, Suite 300
Cheyenne, Wyoming 82002

Attn: John Burbridge, Chief Counsel

Docket No. 20000-__-ET-21
Record No. _____

**RE: IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER
FOR AUTHORITY TO REVISE RULE 12**

Dear Mr. Burbridge:

Enclosed for filing is one copy of Rocky Mountain Power's ("Company") application requesting authority to revise Rule 12 Line Extensions to update the line extension allowance as required by the tariff.

The application, exhibits, and supporting workpaper are also being provided by CD and in electronic format on the Docket Management System.

All formal correspondence and staff requests regarding this matter should be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

with copies to: Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 W. 27th St.
Cheyenne, WY 82001
E-mail: stacy.splittstoesser@pacificorp.com

Wyoming Public Service Commission

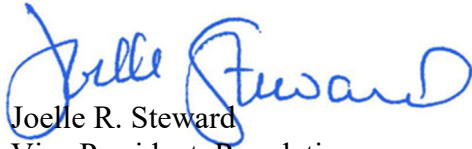
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stephanie.barber-renteria@pacificorp.com

Please contact Stacy Splittstoesser, Wyoming Regulatory Affairs Manager at (307) 632-2677 if you have any questions.

Sincerely,



Joelle R. Steward
Vice President, Regulation

Enclosures

Emily L. Wegener
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Rocky Mountain Power
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BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE)	
APPLICATION OF ROCKY)	Docket No. 20000-__-ET-21
MOUNTAIN POWER FOR)	Record No. _____
AUTHORITY TO REVISE RULE 12)	
)	APPLICATION

COMES NOW, Rocky Mountain Power (the “Company”), and hereby applies to the Wyoming Public Service Commission (the “Commission”) for authority to revise the Rule 12 Line Extensions policy.

In support of this Application, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a public utility in the state of Wyoming and is subject to the jurisdiction of the Commission with regard to its rates and service. Rocky Mountain Power also provides retail electric service in the states of Idaho and Utah.

2. Communications regarding this Application should be addressed to:

By e-mail (preferred): datarequest@pacificorp.com
stacy.splittstoesser@pacificorp.com
emily.wegener@pacificorp.com
stephanie.barber-renteria@pacificorp.com

By mail: Data Request Response Center
Rocky Mountain Power
825 NE Multnomah St., Suite 2000
Portland, OR 97232

Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 W. 27th St.
Cheyenne, WY 82001

Informal inquiries may be directed to Stacy Splittstoesser at (307) 632-2677.

3. The Company recently reviewed its Rule 12 Line Extensions tariff pursuant to the Company's tariff language in Rule 12, Section I.F, which states, "The Company will periodically review the Extension Allowance and may propose adjustments from time to time. This periodic review shall occur no less often than every three years." The Company last reviewed and filed for revisions to Rule 12 on March 3, 2017 under Docket No. 20000-511-ET-17 (Record No. 14658).

4. The Company filed a new general rate case ("GRC") on March 2, 2020 under Docket No. 20000-578-ER-20 (Record No. 15464) (or "2020 GRC") with a proposed rate effective date of January 1, 2021. As outlined in the Rule 12 tariff, the Company was due to review the Extension Allowance in 2020. The new GRC filing included updates to the Company's requested revenue requirement and subsequent cost of service of which the cost of service study is required to evaluate and review the Extension Allowance. The Company planned on reviewing the Extension Allowance once the outcome of the GRC was known.

5. On May 18, 2021 and June 17, 2021, the Commission conducted public deliberations in the 2020 GRC and rendered a final decision. The Company updated its cost of service to align with the Commission's decision. The Company has now completed the review of the Extension Allowance based on the new cost of service study from the Commission's decision in the 2020 GRC.

6. Based on the results of the review, the Company proposes to increase the residential Extension Allowance from \$1,400 to \$1,800. The Company also proposes to increase the residential Extension Allowance located within a planned development from \$400 to \$500. The Company proposes no change to the non-residential Extension Allowance at this time because the cost of service review shows no significant change from the prior review.


7. The supporting calculations are included in Exhibit 1 to this application.

8. The legislative and clean versions of the Company's proposed Rule 12 Line Extensions tariff language are included in Exhibit 2 to this application. The Company respectfully requests approval of the proposed changes with an effective date of April 1, 2022 or sooner if possible.

WHEREFORE, Rocky Mountain Power respectfully requests that in accordance with Chapter 3, Section 21(j) of the Commission's Rules of Practice and Procedure, the Commission issue an order approving the modifications to the Rule 12 Line Extensions policy effective April 1, 2022 or sooner if possible.

DATED: October 14, 2021

Respectfully submitted,



Emily L. Wegener

Stephanie Barber-Renteria (Wyoming Bar #7-4917)

Attorneys for Rocky Mountain Power

Exhibit 1

Line Extension Allowance

State of Wyoming

Based on December 31, 2021 Test Period Cost of Service Study

		Residential	General Service
1	Average Price per kWh	\$0.1149	\$0.0753
2	Average Annual Revenue per Customer	\$911	\$9,206
3	Average annual kWh per customer	7,926	122,327
4	Generation Revenue Requirement	\$0.0566	\$0.0503
5	Transmission Revenue Requirement	\$0.0156	\$0.0132
6	Substation Costs	\$0.0047	\$0.0024
7	Backbone Feeder Cost	\$0.0206	\$0.0068
8	Billing and Accounting Costs	\$0.0061	\$0.0003
9	Total Non Line Extension Costs	\$0.1035	\$0.0729
10	Margin to Apply to Line Extension	\$0.0114	\$0.0023
11	Annual Margin per Customer	\$90	\$285
12	Fixed charge % of investment	10.65%	10.65%
13	Investment Supported by Revenue	\$848	\$2,674
14	Investment to Revenue Ratio	0.9	0.3
15	Gross Investment per Customer		
16	Line Extension Related Distribution Plant	\$1,762	\$9,807
17	Investment to Revenue Ratio	1.9	1.1
18	Current Line Extension Allowance	\$1,400	1.0 X Revenue
19	Line Extension Allowance Supported by Cost of Service	\$1,762	1.1 X Revenue
<p>Source:</p> <p>Lines 1 - 8: Wyoming December 2021 Cost of Service Study</p> <p>Line 9: Sum Line 4 to Line 8</p> <p>Line 10: Line 1 - Line 9</p> <p>Line 11: Line 3 X Line 10</p> <p>Line 12: Financial Analysis - Distribution Plant Use of Facilities Charges, Incremental Cost of Capital</p> <p>Line 13: Line 11 / Line 12</p> <p>Line 14: Line 13 / Line 2</p> <p>Line 16: Residential - FERC Accounts 364 to 367 Secondary Voltage, Accounts 368 to 370 General Service - FERC Accounts 364 to 370</p> <p>Line 17: Line 16 / Line 2</p>			

Exhibit 2

ROCKY MOUNTAIN POWER

First Revision of Sheet No. R12-6
Canceling Original Sheet No. R12-6

P.S.C. Wyoming No. 17

Line Extensions Rule 12

I. Line Extensions – Conditions and Definitions (continued)

M. Restrictions

An Extension of the Company's facilities is subject to these regulations and other rules and restrictions. These may include but are not limited to: laws of the United States; laws of the State of Wyoming; executive and administrative proclamations; Commission orders or regulations; or by any lawful requirement of a governmental body.

N. Routes, Easements and Rights-of-Way

The Company will select the route of an Extension in cooperation with the Applicant. The Applicant will acquire and pay all costs of obtaining complete unencumbered rights-of-way, easements or licenses to use land, and will pay all costs for any preparation or clearing of land the Company may require. Any required easements will be prepared on Company-provided forms. The Applicant may request that the Company assist in obtaining rights-of-way, easements or licenses as described above at the Applicant's expense.

O. Rules Previously in Effect

Rule changes do not modify existing Extension contracts. If a Customer advanced funds for an Extension under a Rule or a contract previously in effect, the Company will make refunds for additional Customers as specified in the previous Rule or contract.

P. Service Conductors

The secondary-voltage conductors extending from the pole line, the underground secondary-voltage main, a secondary-voltage transformer, or a secondary-voltage switch cabinet to the Point of Delivery.

II. Residential Extensions

A. Extension Allowances

The Extension Allowance for permanent single residential applications is ~~\$1,800~~1,400. The Extension Allowance for a residential application in a planned development is ~~\$500~~400. Residential meters used by the Company for billing purposes are provided at no cost to the Applicant. The Applicant must advance

(continued)

Issued by
Joelle R. Steward, Vice President, Regulation

Issued: ~~June 25~~October 14, 2021

Effective: With service rendered
on and after ~~April~~July 1, 2021

WY_R12-6.LEGE

Dkt. No. 20000-~~578~~ -ETR-210

ROCKY MOUNTAIN POWER

First Revision of Sheet No. R12-6
Canceling Original Sheet No. R12-6

P.S.C. Wyoming No. 17

Line Extensions
Rule 12

the costs exceeding the Extension Allowance prior to the start of construction.

(continued)

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WY_R12-6.LEGE

Dkt. No. 20000-~~578~~ -ETR-210

ROCKY MOUNTAIN POWER

First Revision of Sheet No. R12-14
Canceling Original Sheet No. R12-14

P.S.C. Wyoming No. 17

Line Extensions Rule 12

IV. Extensions to Planned Developments (continued)

A. General (continued)

1. Improved Planned Developments

The Company will install facilities in developments before there are actual Applicants for service under the terms of a written contract with the developer. Developments where this is done are improved planned developments.

2. Unimproved Planned Developments

Unimproved planned developments are those where the developer has not contracted with the Company to install facilities to serve each lot before there are actual Applicants for service. Applicants for service in an unimproved development will receive service under the provisions for residential and nonresidential extensions, but with the design and installation of the extension within the unimproved development including accommodation for future loads on platted lots along the route of the extension.

When an existing development is re-platted or changes configuration or use, the development shall be treated as a new development with the facilities designed to meet current standards for the revised portion of development.

B. Allowances and Advances for Improved Planned Developments

For nonresidential developments, the Developer must pay an advance equal to the Company's estimated installed costs to make primary service available to each lot. An Applicant who contracts for service before or in conjunction with the Developer may contract to use the excess of their allowance, if any, to help fund the primary voltage facilities necessary to serve them.

For residential developments the Company will provide the Developer an Extension Allowance of \$1,~~300,000~~ for each lot to which secondary voltage service is made available. The Developer must pay an advance for all other costs. The Developer may be required to pay a refundable advance equal to the Extension Allowance.

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Issued by

Joelle R. Steward, Vice President, Regulation

Issued: ~~October 14~~ June 25, 2021

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WY_R12-14.LEGE

Dkt. No. 20000-578-ETR-210

ROCKY MOUNTAIN POWER

First Revision of Sheet No. R12-6
Canceling Original Sheet No. R12-6

P.S.C. Wyoming No. 17

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Line Extensions Rule 12

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For residential developments the Company will provide the Developer an Extension Allowance of \$1,300 for each lot to which secondary voltage service is made available. The Developer must pay an advance for all other costs. The Developer may be required to pay a refundable advance equal to the Extension Allowance.

(continued)

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Joelle R. Steward, Vice President, Regulation

Issued: October 14, 2021

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on and after April 1, 2021

WY_R12-14.REV

Dkt. No. 20000-___-ET-21