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Date: April 14, 2014

Subject: Docket 09-035-36

In the Matter of: the Application of Rocky Mountain Power for Approval of a Strategic Communications and Outreach Program for Demand Side Management

Background

On March 13, 2014 Rocky Mountain Power Company (Company) filed with the Public Service Commission (Commission) its annual report on the effectiveness of its demand-side management (DSM) outreach and communications campaign (Report). The Commission subsequently issued a Notice of Filing and Comment Period on March 20, 2014.

The Company filed in May 2009 a request to implement a communications and outreach program in order to increase awareness of and participation in the Company's DSM programs. A 2007 survey conducted by Dan Jones & Associates demonstrated a general lack of awareness of DSM programs among the Company's customers. The Commission ordered an approval of the program on June 11, 2009. The Company has continued to utilize Dan Jones & Associates to gauge the effectiveness of the program.

Discussion

The Office has reviewed the report and attached exhibits. Exhibit A is a power point presentation demonstrating the results of the 2013 Dan Jones phone survey completed in cooperation with Questar Gas Company. Exhibit B is the actual survey questions used by Dan Jones & Associates. The Office generally supports the program and comments on the following four items:

- Reporting of demographic information,
- Timing of telephone interviews,
- Downward trend of reported DSM actions, and
- Awareness of the Cool Keeper program.

The final questions of the survey identify the demographics of the person completing the survey; particularly whether the person rents or owns; age and income level. This demographic information is notably absent from Exhibit A, it is not factored into any of the provided analysis of the survey. The Office has learned from Questar Gas Company that the survey is prone to respondents choosing to begin but not complete it; and that the majority of those who remained on the phone to answer all questions were in the 55 and above age categories. The Office asserts that the demographic information of the respondents is material to the analysis of the effectiveness of the Company's DSM outreach. Different demographic groups have different habits relating to energy use, conservation actions, as well as to what types of media they are likely to be exposed. Actions should be taken to mitigate over representation of any groups in the survey results and any over representation of demographics should be considered when determining effective communication strategies. This demographic information, as well as the actions taken to account for demographics should be included by the Company in future reports for review by Interveners.

The Company contends that the telephone interviews have been conducted using the same questions for 2010, 2011, 2012 and 2013 in order to provide continuity in the study results from year to year. This telephone interview was conducted during the July/August timeframe in 2010 and 2011. The interview was then moved to September for years 2012 and 2013. The Company now proposes moving the telephone interview date back to the July/August timeframe. The Company states that this move will allow them, "to take advantage of the advertising in the marketplace and to be able to utilize learning to make changes to the plan as necessary." The Office

asserts that changing the dates of the survey will only serve to sacrifice the continuity developed from the previous two years. The Office supports efforts to utilize information garnered from the study to make program improvements, however it is not clear how changing the survey date to July/August will facilitate plan changes. Further, the Office is concerned that by changing the date of the survey, the Company, stakeholders, and regulators will not know whether any changes in survey results relate to the change in timing or effectiveness of outreach. The Office questions whether there is any real advantage to the change in timing of the survey other than using timing rather than effectiveness to produce higher numbers. To be clear, the Company is not requesting permission to move the survey date but includes that information in the conclusions and recommendation section of the Report.

The Office notes that the survey indicates a downward trend in respondents reporting energy conservation action; and that this may be due to customers having exhausted the lower cost actions. The Office will continue to monitor this trend to identify any correlation to lower energy savings.

The Office also notes the decline in awareness of the Cool Keeper program; this decrease was expected by the Company. The Company reduced marketing activities for Cool Keeper in coordination with the decision to replace all of the original Cool Keeper devices with more modern devices. The Office agrees with the Company's allocation of marketing resources away from Cool Keeper in order to complete the new device installation. The Office anticipates that once the new Cool Keeper devices have been installed for all current participants that the Company will again focus its efforts to raising awareness and participation in Cool Keeper.

Recommendations

The Office recommends that the Commission require the Company to include the demographics of survey respondents as part of the analysis for future DSM Outreach Reporting.