



GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: The Public Service Commission of Utah

From: The Office of Consumer Services
Michele Beck, Director
Danny A.C. Martinez, Utility Analyst
Cheryl Murray, Utility Analyst

Copies To: Rocky Mountain Power
Carol Hunter, Vice President, Services
Lisa Romney, DSM Regulatory Manager

Division of Public Utilities
Chris Parker, Director
Artie Powell, Energy Section Manager

Date: February 20, 2013

Subject: DSM Report Supplementary Filing Pursuant to Commission Order
in Docket 10-035-57

Background

On November 28, 2012, Rocky Mountain Power (“Company”) filed with the Public Service Commission of Utah (“Commission”) its Semi-Annual Forecast Report (“Report”). On December 21, 2012, the Office of Consumer Services (“Office”) filed comments with the Commission. In its comments, the Office noted that the Company omitted two elements in the Report ordered by the Commission in its December 21, 2011 order (“Order”). These items included:

1. Reporting capacity and energy targets in comparison to Utah DSM program targets included in the most recent IRP.
2. Reporting savings estimates for the DSM Irrigation Load Control program in terms of both total program participation and contribution to peak.

On December 28, 2012, the Division of Public Utilities (“Division”) filed comments identifying the same elements as missing from the Report. The Division recommended to the Commission to order the Company to comply with the Order prior to acknowledging the Company’s filing.¹ On January 31, 2013, the Company filed with the Commission a

¹ See Division Action Request Response – Docket No. 10-035-57, December 28, 2012, p3.

supplemental report (“Supplement”) to address the missing elements cited by the Office and the Division.

Discussion

Comparison with Current IRP

The Supplement comprises Attachment A from the November Report filing and adds “Resource Planning Results.” Resource Planning Results include DSM program targets from the current IRP. This format provides the comparative information the Commission ordered and should be used each year the Company files its projected capacity savings forecast.

Irrigation Load Control Program

The Company states that the Irrigation Load Control program has forecasted savings of 35 MW. The Office notes that this is the same information that was included in the original Report; thus the Company has yet to provide total program participation and contribution to peak information as was ordered.² As stated above the Office and Division both identified this omission in earlier comments and the Company still has not provided this Commission ordered information in the Supplement. The Office recommends to the Commission that the Company be required to provide total program participation and participation at system peak for the Irrigator Load Control program in the Supplement as previously ordered.

Recommendation

The Office recommends the Commission require the Company to re-file its report to comply with previous Commission orders by reporting savings estimates for the DSM Irrigation Load Control program both in terms of total program participation and contribution to peak.

² In its February 10, 2012 correspondence with the Company, the Commission reiterated its order as follows:

OCS recommends the Commission direct the Company to refine these forecasts by reporting savings estimates for the DSM Irrigation Load Control program both in terms of total program participation and contribution to peak in future filings. *The Commission agrees with this recommendation and directs the Company to incorporate this information in future filings.* (Italics added)