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ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
Energy Section
Artie Powell, Manager
Brenda Salter, Technical Consultant
Abdinasir Abdulle, Technical Consultant

Date: February 21, 2013

Re: Rocky Mountain Power's Utah Demand-Side Management Semi-Annual Forecast for 2013, Docket No. 10-035-57. The Division recommends conditional acknowledgement of the DSM 2013 forecast.

RECOMMENDATION (Conditional Acknowledgement)

The Division of Public Utilities (Division) recommends that the Commission conditionally acknowledge the 2013 Semi-Annual Forecast filed by Rocky Mountain Power (Company) as being in compliance with the Commission Order of August 25, 2009 in Docket No. 09-035-T08 approving the Phase I stipulation. The Division recommends conditional acknowledgement pending the Company providing the additional Irrigation Load Control data.

ISSUE

On December 28, 2012 the Division filed its response the Commission's Action Request dated November 30, 2012. In this response the Division requested a conditional

acknowledgement of the Company's filing based on missing information. On December 21, 2011 the Commission ordered the Company to include the capacity and energy savings targets in comparison to Utah DSM program targets included in the most recent IRP. The February 10, 2012 Commission's acknowledgment of RMPs Utah DSM Semi-annual Forecast required the Company to include the savings estimates for the DSM Irrigation Load Control program. On January 31, 2013 the Company filed a Demand-Side Management supplementary filing. On January 31, 2013 the Commission issued an Action Request requesting the Division to review the supplemental filing for compliance and make a recommendation. This memorandum is in response to the Commission's Action Request.

DISCUSSION

The Company's Supplemental filing provided the comparison of the calendar year 2013 projected targets with the Company's most recent resource planning model results from the 2012 Supply-Side Resource Request for Proposals¹ (2012 RFP) as ordered by the Commission on December 21, 2011. Attachment 1 provides a comparison of Class 1 DSM – residential, commercial and industrial resource planning for 2013. The total Class 1 MW at generation are comparable showing the Semi-Annual forecast MW of 152 and the 2012 RFP filing MW of 157. In reconciling the 2012 RFP filing with the Resource Planning Results shown on Attachment 1, the Division noted that the Irrigation Load Control (Sch. 96 & 96A) MW were 38 and 37 respectively². The Division issued DPU data request 2.1 requesting the Company verify the Irrigation Load Control MW in the 2012 RFP. The Company's response indicated an error in the supplemental filing and stated the Irrigation Load Control 2013 MW of 38 was correct. The 2012 RFP Class 1 DSM MW total is 158 with this correction. A Class 2 DSM comparison is not available. Class 2 resources are not provided to or selected in the IRP modeling by program. DSM supply curves are used to compare competing supply-side or other resource alternatives available to the model. These supply curves are

¹ The Division notes that the Company did not use the 2011 IRP data nor did the Company use the draft 2013 IRP information. The most recent resource planning model is from the 2012 Supply-Side Resource RFP filed in Docket No. 11-035-73.

² Docket No. 11-035-73, DPU DR 2.4 Confidential Attachment

not program specific therefore making a comparison between what was selected in the IRP and how to acquire the resource not readily available.

The Company indicated that the savings estimated for the DSM Irrigation Load Control was provided with the original filing in Attachment A under the Industrial Programs section. The Office of Consumer Services (Office or OCS) is still concerned that the Company's response is not sufficient. The Commission's February 10, 2012 acknowledgement letter provided the following direction.

OCS recommends the Commission direct the Company to file 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. [Emphasis added]

In reviewing the supplemental filing it does not appear that the Irrigation Load Control total program participation and the contribution to peak were included. In order to comply with the Commission order the Division recommends the Company provide the additional Irrigation Load Control documentation.

CONCLUSION

Based on its review of the Company's filing, the Division concludes that Company's 2013 Semi-Annual Forecast complies with the Commission Order of December 21, 2011 in Docket No. 10-035-57 but does not meet the requirements for the Commission's acknowledgment dated February 10, 2012. The Division recommends conditional acknowledgement pending the Company providing the additional Irrigation Load Control data.

CC: Michele Beck, OCS
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