



State of Utah
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Division of Public Utilities

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ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Energy Section Manager

Brenda Salter, Technical Consultant

Date: January 6, 2014

Re: Rocky Mountain Power's Utah Demand-Side Management Semi-Annual Forecast for 2014. The Division recommends conditional acknowledgement of the DSM 2014 forecast.

Docket No. 13-035-183

RECOMMENDATION (CONDITIONAL ACKNOWLEDGEMENT)

The Division of Public Utilities (Division) recommends that the Commission conditionally acknowledge the 2014 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. Prior to acknowledging the filing the Division recommends the Commission direct the Company to explain its plans for acquiring replacement resources for the 11 MW deficiency as forecasted in the Company's filing.

ISSUE

On December 4, 2013 the Division and the Office of Consumer Services (Office) provided comments on the Company's 2014 DSM Semi-Annual Forecast. On December 19, 2013 the Company filed reply comments as outlined in the Commission's November 4, 2013 Notice of Filing and Comment Period. On December 19, 2013, the Commission issued an Action Request

to the Division directing it to determine if the Company's responses answer the Division's questions. The due date for the Division's comments is January 17, 2014. This memorandum is in response to the Commission's Action Request.

DISCUSSION

The Division's initial comments requested that prior to acknowledgement of the filing "the Commission direct the Company to provide an explanation of the deviation of the 2014 energy savings target and the 2013 IRP targets and explain its plans for acquiring replacement resources as outlined in the Commission's Order in Docket No. 10-035-57."

The Company has provided a partial response to the Division's December 4, 2013 comments. In its reply comments dated December 19, 2013, the Company has explained the deviation of the 11 MW in its 2014 DSM forecast from the 2013 IRP target. What the Company did not include is its plan for acquiring replacement resources as outlined in the Commission's Order:

"Report capacity and energy savings targets for such programs in comparison to Utah DSM program targets included in the most recent IRP. The Company shall also explain factors leading to deviations from the IRP targets and, when such deviations result in a forecasted amount which is lower than IRP targeted savings, *the Company shall explain its plans for acquiring replacement resources.*" [Emphasis added]

CONCLUSION

The Division recommends that the Commission require the Company to comply with the Commission's December 21, 2011 Order and explain its plans for acquiring replacement resources prior to acknowledging the Company's filing.

CC: Michele Beck, Office of Consumer Services
Kathryn Hymus, Rocky Mountain Power
Dave Taylor, Rocky Mountain Power