



Salt Lake City, Utah 84111

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December 12, 2014

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

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

Re: Reply Comments
In the Matter of the Request of Rocky Mountain Power for Approval of its Sixth-Year Action Plan and Budget for the Strategic Communications and Outreach Plan for Demand Side Management – Docket No. 14-035-141

On November 7, 2014, the Public Service Commission of Utah (“Commission”) issued a notice of filing and comment period for Docket 14-035-141 in the above referenced matter. Rocky Mountain Power (“Company”) provides these reply comments to address concerns with the Office of Consumer Service’s (“OCS”) comments filed December 1, 2014.

The comments dated December 1, 2014 from OCS state, “...*Furthermore, expenditures should be justified by specific desired outcomes in program participation and not just general awareness.*”

Currently, the Company’s communications objectives are not tied to specific programs. Communication objectives since inception have been to 1) educate customers about the Company’s summer tiered pricing structure, 2) build awareness of the energy efficiency opportunities and energy efficiency and peak management programs offered by the Company, 3) identify the personal and societal benefits associated with energy efficiency opportunities and energy efficiency and peak use management, 4) motivate customers to change behaviors and act on energy efficiency opportunities, and 5) promote energy efficiency steps customers can take to reduce energy consumption associated with summer cooling.

The Strategic Communications and Outreach Plan is focused on promoting behavior change and building awareness of how to be *wattsmart* and take advantage of *wattsmart* programs and incentives. The current type of plan and budget does not allow the Company to track program participation.

The timing of the *wattsmart* campaign has been the summer peak usage months (April through September). In the year 4 plan,¹ the Demand Side Management Advisory Group² (“Steering Committee”) requested a shift to focus more on behavior change. At that point, the Company revised creative and utilized multiple touch points to reach the target audience to keep the *wattsmart* message top-of-mind, essential to changing behavior.

Developing a plan that can track to specific program uptick requires a much heavier program schedule, specific focused offers and a very different approach. If this is the desire of the Steering Committee, the Company can plan on presenting a program that meets these criteria for the 2016 plan. This change in direction will be discussed in 2015 Steering Committee meetings. The Company proposes that any changes agreed with the Steering Committee will be filed for Commission approval before the 2016 Strategic Communications and Outreach Plan for Demand Side Management is filed in November 2015.

Informal inquiries regarding this filing may be directed to Michael Snow, DSM Regulatory Projects Manager, at (801) 220-4214.

Sincerely,



Kathryn Hymas
Vice President, Demand Side Management

Cc: Division of Public Utilities
Office of Consumer Services

¹ Approved May 1, 2012 by Commission Order in Docket No. 12-035-71.

² In context of this filing, Demand Side Management Advisory Group is redefined as the Steering Committee.