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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

)	
In the Matter of the Application of)	
Rocky Mountain Power for Approval)	DOCKET NO. 17-035-____
to Revise Demand Side Management)	
Annual Energy Efficiency and Peak)	APPLICATION OF
Load Reduction Report Requirements)	ROCKY MOUNTAIN POWER
)	

Rocky Mountain Power, a division of PacifiCorp (“Company”), hereby submits this application (“Application”) to the Public Service Commission of Utah (“Commission”), requesting approval to revise the Demand Side Management (“DSM”) Annual Energy Efficiency and Peak Load Reduction Report Requirements (“Annual Report”). In support of its Application, the Company states as follows:

1. Rocky Mountain Power is a division of PacifiCorp, an Oregon corporation, which provides electric service to retail customers through its Rocky Mountain Power division in the states of Utah, Wyoming and Idaho, and through its Pacific Power division in the states of Oregon, California, and Washington.

2. Communications regarding this Application should be addressed to:

Michael S. Snow
Manager, DSM Regulatory Affairs
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, UT 84116
Telephone: (801) 220-4214
Email: Michael.Snow@PacifiCorp.com

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In addition, the Company requests that all data requests regarding this application be sent to the following:

By e-mail (preferred): datarequest@pacificorp.com
michael.snow@pacificorp.com

By mail: Data Request Response Center
Rocky Mountain Power
825 NE Multnomah St., Suite 800
Portland, OR 97232

Informal questions may be directed to Michael Snow, DSM Regulatory Affairs Manager at (801) 220-4214.

BACKGROUND

3. Pursuant to the Order issued January 15, 2013, in Docket No. 12-035-116, the Company is required to provide the Annual Report by May 1st each year. Requirements for the Annual Report are derived from multiple orders issued in several dockets dating back to 2009. The Annual Report requirements and references to said dockets and orders are provided as Appendix A to the Annual Report each year. The Company has discussed Annual Report requirements with DSM Steering Committee members on several occasions, adjusting and clarifying the information provided to increase the Annual Report's value. In an effort to update the formal Annual Report requirements, remove ambiguity, and to consolidate requirements under one docket and order, current Annual

Report requirements will be discussed below along with proposed changes to them based on discussions with DSM Steering Committee members.

ANNUAL REPORT REQUIREMENTS

4. Table 1 below contains a reference to Commission orders and dockets from where the requirements originate, descriptions of current Annual Report requirements, and descriptions of new proposed requirements to replace current requirements. The rationale for each proposed requirement is discussed in the paragraphs following Table 1.

Table 1 – Current and Proposed Annual Report Requirements

Requirement No.	Docket/Order Reference	Current Requirement	New Proposed Requirement
1.	Order Issued 1/15/13 in 12-035-116, p. 2	The annual filing date of the Annual Report is May 1.	The Company will file the Annual Report between May 1 and June 1.
2.	Order Issued 12/21/09 in 09-035-27, p. 3	In the executive summary table, include the estimate of megawatt savings at the time of system peak corresponding to the mega-watt hour savings for energy efficiency programs.	Consolidate this requirement with proposed Requirement No. 3.
3.	Order Issued 12/21/09 in 09-035-27, p. 3	In the executive summary table, include the Integrated Resource Plan megawatt and megawatt-hour targets.	The Company shall report Class 1 capacity reduction, estimated Class 2 megawatt savings during system peak, and Class 2 megawatt-hour savings achieved, all compared against the Integrated Resource Plan targets and forecast targets submitted in the applicable DSM November 1 st Deferred

Requirement No.	Docket/Order Reference	Current Requirement	New Proposed Requirement
			Account and Forecast Report. ¹
4.	Order Issued 9/11/13 in 13-035-71, pp. 6-7	The Company shall report Class 1 and Class 2 DSM planned megawatts for Utah when planned megawatts at the program level are unavailable in the Company's portfolio. The Company may use the DSM November 1 st Deferred Account and Forecast Report for reporting the program by program comparison of forecast and actual megawatt hours when the IRP preferred portfolio does not contain this information. The Company shall report the IRP planned DSM megawatts for Utah at the time of system peak corresponding to the DSM report year, as shown in the Company's IRP preferred portfolio.	Consolidate this requirement with proposed Requirement No. 3.
5.	Order Issued 12/21/09 in 09-035-27, p. 3	In the executive summary table, include the lifetime megawatt-hour savings in addition to first year savings.	In the executive summary, include the lifetime megawatt-hour savings in addition to first year megawatt-hour savings.

¹ Pursuant to the Phase I Stipulation filed August 3, 2009, in Docket No. 09-035-T08, and approved in the order dated August 25, 2009, in the same, the Company must provide a forecast of expenditures for approved programs and their acquisition targets for the next calendar year by November 1st of each year.

Requirement No.	Docket/Order Reference	Current Requirement	New Proposed Requirement
6.	Order Issued 12/21/09 in 09-035-27, p. 3	In the executive summary table, provide the calculations for reported savings and identify if reported savings are ex-post or ex-ante estimates.	Remove this requirement. Portion duplicative of Requirement No. 7.
7.	Order Issued 7/14/11 in 11-035-74, p. 7	The Company shall clearly state for each program and measure whether all reported savings are ex-post or ex-ante.	No Change to this requirement.
8.	Order Issued 2/15/12 in 11-035-74, p. 1	The Company shall provide DSM capacity benefits in terms of system coincident peak and for each individual program.	Consolidate this requirement with proposed Requirement No. 3.
9.	Order Issued 10/7/09 in 09-035-27, p. 14	Include all of the cost-effectiveness tests in the Program Performance Reporting stage of review, including portfolio analysis in addition to the program and measure level views.	The Company shall accurately and clearly report all cost effectiveness test results at the portfolio and sector level in addition to the program and measure category levels.
10.	Order Issued 10/7/09 in 09-035-27, p. 14	The most recent IRP avoided costs shall be used to evaluate program cost effectiveness, in addition to the avoided costs used when the program was approved.	The Company shall perform cost effectiveness tests using avoided costs from planned assumptions.
11.	Order Issued 7/14/11 in 11-035-74, p. 8	Accurately and clearly report cost effectiveness results to avoid confusion.	Consolidated this requirement with proposed Requirement No. 9.

Requirement No.	Docket/Order Reference	Current Requirement	New Proposed Requirement
12.	Order Issued 1/15/13 in 12-035-117, p. 1	The Company shall perform cost effectiveness tests using initial avoided cost assumptions only for new programs through the first year of implementation or for existing programs that incur significant changes within a given program year.	Consolidate this requirement with proposed Requirement No. 10.
13.	Orders Issued 7/12/12, pp. 3-4 and 9/11/13, p. 8 in 12-035-57 and 13-035-71, respectively.	The Company shall provide cost-effectiveness results with associated decrement values and related inputs such that results regarding the associated year's performance of the Company's peak reduction programs are available in the record, subject to the confidentiality requirements of Utah Administrative Code R746-100-16.	The Company shall provide cost-effectiveness results with associated decrement values and program expenditures for the year's performance of the Company's Class 1 programs, subject to the confidentiality requirements of Utah Administrative Code R746-100-16.
14.	Order Issued 7/12/12 in 12-035-57, p. 2	For Irrigation Load Control program results, capacity savings should be stated in kilowatts, not megawatts.	For Class 1 programs, capacity reduction will be reported in megawatts.
15.	Order Issued 3/15/13 in 13-035-20, p. 5	The Company shall annually provide irrigation load control program data regarding loads available for curtailment, actual curtailment achieved,	The Company shall provide Class 1 program data regarding loads available for curtailment, actual curtailment achieved, and program expenditures.

Requirement No.	Docket/Order Reference	Current Requirement	New Proposed Requirement
		and capacity and energy reduction payments in its Utah DSM Annual Report.	
16.	Order Issued 10/7/09 in 09-035-27, pp. 13-14	The term “reported” includes both ex-post and ex-ante energy savings. Include results of ex-post impact evaluations or the schedule for completion of ex-post impact evaluations to be conducted for each program.	The Company shall include published evaluations that have not previously been provided in an Annual Report, and also include a schedule of current and upcoming evaluations.
17.	Order Issued 10/7/09 in 09-035-27, p. 14	The Annual Report shall include a review of the IRP planned DSM amounts and the Annual Report’s “actual” results.	Consolidate this requirement with proposed Requirement No. 3.
18.	N/A	N/A	The Company shall submit process and impact evaluation and annual reporting costs at the sector level for the cost effectiveness tests.

REQUIREMENT NO. 1

5. Due to the amount of reporting workload in the second quarter of each year required of the Company, extension requests have been filed multiple times in the past for the Annual Report. To avoid extension requests in the future, the Company proposes a permanent change to the due date of the Annual Report to be due no later than June 1st annually. To give DSM Steering Committee members and the Commission a sense of

consistency, the Company also proposes to file the Annual Report no earlier than May 1st annually.

REQUIREMENT NO. 2

6. The Company proposes to consolidate this requirement with proposed Requirement No. 3 with updated language to clarify the requirement and reflect actual practice of what is reported in the Annual Report.

REQUIREMENT NO. 3

7. The most accurate forecast to use when reporting achieved savings to planned savings is the Company's November 1st Deferred Account and Forecast Annual Report ("November 1st Report"), which is based on the IRP. Accordingly, the Company proposes to update Requirement No. 3 to clarify that the Company shall use the applicable November 1st Report in its reporting in addition to the IRP.

REQUIREMENT NO. 4

8. The Company proposes to consolidate this requirement with proposed Requirement No. 3.

REQUIREMENT NO. 5

9. The Company proposes to keep this requirement the same, but with updated language to clarify that first year savings will be reported as first year megawatt-hour savings.

REQUIREMENT NO. 6

10. Due to the extensive volume of measures, the Company proposes to remove the requirement to "provide the calculations for reported savings" from the Annual Report. Reported savings for custom projects are calculated in the Company's proprietary incentive

calculator tools. As a result of the high volume of projects, saving verifications were moved to a system control validating against the Company's measure assumptions. If DSM Steering Committee members or Commission Staff wish to see the verification of reported savings, the Company can provide this demonstration on site at any time. The latter portion of Requirement No. 6 is covered in proposed Requirement No. 7.

REQUIREMENT NO. 7

11. There is no proposed change to this requirement. The Company will continue to state in the Annual Report whether reported savings are ex-post or ex-ante.

REQUIREMENT NO. 8

12. The Company proposes to consolidate this requirement with Requirement No. 3.

REQUIREMENT NO. 9

13. The Company proposes to update this requirement to clarify that cost effectiveness results will be reported at the portfolio and sector level in addition to the program and measure category levels, reflecting actual practice in the Company's Annual Report.

REQUIREMENT NO. 10

14. The Company proposes to update this requirement to clarify that the appropriate avoided costs from planned assumptions will be used for cost effectiveness testing. This will maintain symmetry and accuracy with the planned assumptions used in the applicable November 1st Report.

REQUIREMENT NO. 11

15. The Company proposes to consolidate this requirement with proposed Requirement No. 9 as they both require the same accurate reporting of cost effectiveness results.

REQUIREMENT NO. 12

16. The Company proposes to consolidate this requirement with proposed Requirement No. 10, which covers the issue of avoided costs.

REQUIREMENT NO. 13

17. The Company proposes minimal changes to this requirement to clarify that “related inputs” is referring to “program expenditures,” aligning more clearly with the Company’s cost effectiveness inputs.

REQUIREMENT NO. 14

18. The Company proposes to change this requirement so that capacity reduction for Class 1 programs are reported in megawatts rather than kilowatts. Reporting in megawatts is consistent with Requirement No. 3 and also reflects industry practice of reporting in megawatts.

REQUIREMENT NO. 15

19. The Company proposes to clarify this requirement to be in regards to Class 1 program data rather than just Irrigation Load Control data, and to clarify “capacity and energy reduction payments” as “program expenditures.”

REQUIREMENT NO. 16

20. The Company proposes to update this requirement with clarifying language that any published evaluations that have not previously been provided with the Annual

Report will be provided in the subsequent Annual Report, and a schedule of current and upcoming evaluations will also be provided.

REQUIREMENT NO. 17

21. The Company proposes to consolidate this requirement with proposed Requirement No. 3, comparing actual results against targets from the applicable November 1st Report as well as the IRP.

REQUIREMENT NO. 18

22. The Company proposes to add a new requirement to the Annual Report, clarifying that process and impact evaluation and annual reporting costs will be provided at the sector level, rather than program level, for cost effectiveness testing in the Annual Report. This will provide transparency of costs and more accurate budget forecasting.

STAKEHOLDER INVOLVEMENT

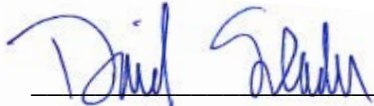
23. The Company circulated a draft of this Application to the DSM Steering Committee on January 3, 2017. After receiving concerns from Steering Committee members regarding the removal of IRP information from the Annual Report and other minor issues, the Company adjusted the proposed requirements to address the minor issues and continue providing IRP information. No other concerns were raised by Steering Committee members.

24. In an effort to regularly improve the Annual Report, the Company will continue to work in partnership with Steering Committee members to ensure it provides helpful and valuable information. As requested by Steering Committee members or as identified by the Company, additional information may be added beyond the existing requirements that is deemed useful and reasonable.

WHEREFORE, the Company respectfully requests the Commission issue an order approving the proposed Annual Report requirements described in Table 1 above, superseding all current Annual Report requirements, beginning with the 2016 Annual Report. The Company requests an effective date of February 17, 2017, so the new proposed requirements may be applied to the 2016 Annual Report.

DATED this 18th day of January, 2017.

Respectfully submitted,



Daniel E. Solander
Attorney for Rocky Mountain Power