



GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: Public Service Commission

From: Office of Consumer Services
Michele Beck, Director
Gavin Mangelson, Utility Analyst

Date: February 2, 2017

Subject: Docket 17-035-04

In the Matter of: the Application of Rocky Mountain Power for Approval to Revise Demand Side Management Annual Energy Efficiency and Peak Load Reduction Report Requirements

On January 18, 2017 Rocky Mountain Power Company (Company) filed with the Public Service Commission (Commission) an application to revise the reporting requirements for the Annual Demand Side Management Report (Annual Report). The Commission posted a Notice of Filing and Comment Period on January 20, 2017.

The current requirements for the Annual Report derive from Commission Orders from several separate dockets over a number of years. The Company has identified the orders containing requirements for the Annual Report and has listed them in the application.

IRP Targets vs. Realized Capacity Reduction

A preliminary proposal was submitted to the DSM Steering Committee for review and suggestions. The Office of Consumer Services (Office) worked with the Company and other members of the Steering Committee to ensure that, among other things, the Annual Report maintain clear comparisons of the DSM portfolio performance and the goals laid out in the Integrated Resource Plan (IRP). In these discussions the Office advocated specifically for preservation and clarification of the comparison between the IRP Class 2 DSM capacity reduction targets (MW), and the actual MW capacity reduction achieved through Class 2 DSM programs.

The Office asserts that MW capacity reduction is an important benefit of the DSM portfolio. A straightforward comparison of the realized Class 2 DSM capacity reduction to the IRP targets in the Annual Report executive summary is essential in order to properly ascertain whether or not the DSM portfolio is meeting the IRP targets. This information can be used not only in developing strategy for the DSM portfolio, but the historical performance should also be considered when determining the feasibility of future IRP targets, and the potential ramifications of unrealized IRP-targeted capacity reductions. The proposed reporting requirement listed in the application as requirement number three adequately describes this comparison.

The Office notes that unlike Class 1 DSM capacity reduction, Class 2 DSM capacity reductions are achieved through energy savings (i.e. increased energy efficiency), rather than load control, and are estimated through megawatt savings at system peak.

Filing Date and Other Requirements

The Office also supports allowing the Company to file the Annual Report during the proposed timeframe, rather than on a set date. The Office supports the remaining proposed requirements as they provide useful information pertaining to the DSM portfolio, and subordinate programs.

Recommendation

The Office recommends that the Commission approve the requested revisions to the Annual Report.

Copies To: Rocky Mountain Power
Bill Comeau, Director, Customer Solutions
Michael Snow, Manager, DSM Regulatory Affairs

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