



State of Utah

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Public Service Commission

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July 22, 2020

Ms. Jana Saba
Rocky Mountain Power
1407 W North Temple, Suite 330
Salt Lake City, UT 84116

Data Request Response Center
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232

Re: *Rocky Mountain Power's Demand-Side Management 2019 Annual Energy Efficiency and Peak Load Reduction Report; Docket No. 20-035-27*

Dear Ms. Saba:

The Public Service Commission (PSC) reviewed Rocky Mountain Power's (RMP) June 1, 2020 filing of its Demand-Side Management (DSM) 2019 Annual Energy Efficiency and Peak Load Reduction Report ("Report"). The PSC also reviewed the June 22, 2020 comments of the Division of Public Utilities (DPU), the June 30, 2020 comments of the Office of Consumer Services (OCS), the July 1, 2020 joint comments of the Southwest Energy Efficiency and Utah Clean Energy ("SWEEP/UCE"), and RMP's July 16, 2020 reply comments and corrected Report.

DPU states the Report complies with the PSC's reporting requirements and recommends acknowledgement. Likewise, OCS recommends the PSC acknowledge the Report as satisfying the PSC's reporting requirements. In future reports, OCS recommends RMP include certain clarifying references in Appendix 1 concerning expenditures for Class 1 programs. In addition, OCS identified discrepancies in citations provided in Appendix 1, including the absence of the commitments made by RMP in Docket No. 19-035-22. OCS recommends that RMP include those commitments in the next annual report either in Appendix 1 or other appropriate place. In its reply comments, RMP agreed with OCS's recommendations. The PSC finds RMP's comments address OCS's issues.

SWEEP/UCE recommends the PSC require RMP to provide information in future reports related to 1) the reserve and ancillary service benefits each program provides; 2) a brief explanation of the change in cost effectiveness for each of the cost-effectiveness tests, and 3) an analysis of how program changes explained in the Program Administration or Program Changes sections of the report have affected the cost effectiveness of each program.

In response to SWEEP/UCE Item 1, RMP states it will provide additional information in subsequent reports and/or in DSM Steering Committee meetings regarding the ancillary benefits of its Class 1 programs. The PSC finds RMP's commitment addresses this issue. Regarding SWEEP/UCE Item 2, RMP states it believes that attempting to identify all the various reasons for differences between a given cost-effectiveness result and the previous year's result is not useful. RMP affirms it will continue to provide an explanation for cost-effectiveness tests that fail, but states it does not intend to provide an explanation for tests that pass. Regarding SWEEP/UCE Item 3, RMP states it believes the request is already covered through DSM Steering Committee meetings and Advice Letters, and the information does not need to be provided in the annual reports.

The PSC's December 21, 2009 Order in Docket No. 09-035-27, Proposed Revisions to the Utah Demand Side Resource Program Performance Standards, approved RMP's DSM reporting requirements. These requirements were later revised in the PSC's February 16, 2017 Order in Docket No. 17-035-04, Application of Rocky Mountain Power for Approval to Revise Demand Side Management Annual Energy Efficiency and Peak Load Reduction Report Requirements. The PSC has approved or accepted limited changes to these requirements as agreed to by parties. Absent such agreement, or an application for agency action, the PSC does not find it reasonable to consider changing the reporting requirements.

The PSC's May 23, 2012 Report and Order establishing the DSM Steering Committee, issued in Docket No. 12-035-69, Request for Agency Action for Creation of a DSM Steering Committee for DSM Issues involving Sensitive, Confidential or Proprietary Information or Settlement Negotiations, provided guidance on the DSM Advisory Group and DSM Steering Committee. The DSM Advisory Group was designated as the forum for RMP to solicit input, receive suggestions, and facilitate general discussions of DSM programs and issues, including DSM program results, new or revised DSM programs, and other DSM issues of general concern. The DSM Steering Committee was formed to allow discussions of sensitive, confidential, or proprietary information, settlement negotiations, and to address pending or anticipated disputes relating to DSM programs and issues. Based on these distinctions and absent a formal request to modify the DSM reporting requirements, should UCE/SWEEP desire further consideration of recommendations 2 and 3, it should raise them during a DSM Advisory Group meeting.

Based on the PSC's review of the corrected Report, and the comments and recommendations filed by DPU and OCS, the PSC acknowledges the corrected Report as complying with the PSC's reporting requirements. As committed to in reply comments, RMP shall provide the information requested by the OCS in future DSM reports and additional information regarding the ancillary benefits of its Class 1 Programs in future DSM reports and/or in DSM Steering Committee meetings.

Sincerely,

/s/ Gary L. Widerburg

PSC Secretary

DW#314763