

Office of the Governor AMANDA SMITH Energy Advisor

Dear Commissioners:

Re: Comments on Rocky Mountain Power's Smart Grid Information Standard (SGIS) and Home Energy Rating (HER) Program, as requested by the Public Service Commission (PSC) from members of the Demand Side Management (DSM) Advisory Group

This letter provides comments on how the *Smart Grid Information Standard (SGIS)*, as adopted by the PSC in 2009, could be implemented in Utah. In addition, the PSC asked for members of the DSM Advisory Group to review the idea of Home Energy Reporting (HER) and recommend whether adoption of a HER program is appropriate. Comments regarding implementing the *SGIS* and the adoption of a HER program are as follows.

The SGIS has the potential to greatly increase energy literacy in the public sector and to broadly encourage energy-saving behaviors among Utah's electricity customers. The purpose of the Smart Grid Information Standard is to provide customers sufficient information such that they are able to make informed decisions about their electricity usage and emissions footprint. Customers should be able to easily learn about rates, usage and sources of their electricity to be informed in making energy purchasing decisions. Information provided to customers regarding renewable energy sources should also be accurate and straightforward. That said it would be good for Rocky Mountain Power (RMP) to provide energy information in an easily accessible format for individual customers. Annually, RMP meets with its industrial customers and helps ensure that they have the knowledge to decipher energy data. No such analog exists for the individual energy users. Small businesses and home customers do not likely have the skills to navigate the intricate RMP website, obscure federal filing forms, or hard-to-know-about-for-the-public PSC filings in order to learn details of their electricity. An existing RMP publication, the annual Consumer Information mailer, and the *Voices* newsletter could both provide detailed and regular information about tiered rates, usage, and power sources. Providing this information on-bill, and in regular customer communications will better inform customers about their energy decisions. This is, after all, the purpose of the Smart Grid Information Standard.

Regarding the implementation of an RMP Home Energy Report, this is a very appropriate opportunity to better understand the potential impact of behavioral programs and increased knowledge to improve energy literacy. Home Energy Reporting is being utilized with great success in many U.S. energy markets and is helping to spread the ethic of energy conservation. Both direct marketing and community social marketing are serving to foster energy-conserving behaviors for home dwellers. The RMP proposal to offer a HER program on a 3-year pilot basis is a good first effort. Our office agrees with RMP that the size of the pilot project should be limited to 75,000 households, and that the cost can be capped at \$2.8 million. It may make sense to evaluate the pilot project on an annual basis for all three (3) years. Additionally, RMP and the DSM Advisory Group should be encouraged to look

together at a means to distribute HER information to all customers in a cost-effective manner.

I hope these thoughts are useful and helpful to the Commission. Thank you for the opportunity to make comments on these important DSM programs.

Sincerely yours,

Amanda Smith Governor's Energy Advisor