



# State of Utah

DEPARTMENT OF COMMERCE  
Office of Consumer Services

To: The Public Service Commission of Utah

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Date: May 4, 2010

Subject: RMP Strategic Communications and Outreach Plan for Utah Demand  
Side Management Program Year 2 Plan and Budget  
Docket No. 09-035-36

## Background

On June 11, 2009 the Public Service Commission approved Rocky Mountain Power's application for Approval of a Proposed Strategic Communications and Outreach Program for Demand Side Management. The Program funding is not to exceed \$1.5 million per year for an initial three year period. The effectiveness of the Program is to be monitored over that period with a final assessment performed at the end of the three year period.

The Commission required the Company to "...jointly develop second and third year action plans and budgets with the Utah DSM Advisory Group and shall file them with the Commission for approval prior to April 1<sup>st</sup> of the relevant program year". On April 1, 2010 the Company filed its Strategic Communications and Outreach Plan for Demand-side Management Program Year 2 Plan and Budget.

## Purpose of Program

In its original application for the Program the Company stated

"The overarching program objectives are to promote customer conservation through energy efficiency education and increase customer awareness of and participation in the Company's DSM programs. The program will also deliver the residential rate structure education program ordered by the Commission in Docket No. 07-035-93."

Ten specific objectives were also listed.

The Office agreed that educating customers and increasing awareness of the benefits of conservation and energy efficiency as well as increasing participation in the Company's DSM programs are worthwhile goals and supported approval of the Program.

## Discussion

On November 9, 2009 the Commission issued an Order approving the Company's first year budget for the Program. With the approval of the budget the Commission ordered that "The Company shall include a variance report in all future reports and budgets submitted in accordance with of [sic] prior Order in this Docket". The Office notes that the Year 2 Budget and Plan submitted by the Company on April 1, 2010 does not include the required variance report.

The Program Year 2 Budget includes eight categories of expenses. The Office recommends that the Commission require a more granular accounting of the expenditures and budget including identifying the subject matter or specific ad type incorporated in media expenditures. For example, the filing did not include any advertising or reference to educating customers about the residential summer tiered rates. This area of education could be embedded somewhere in the budget but without more granularity that can not be discerned. It is also insufficient to determine how much is going toward "See ya later refrigerator" in comparison to how much money is going toward "Cool Keeper." Increased granularity will allow parties to verify that the focus of the advertising is on general education and on high value programs.

The Company included several examples of print advertising in the filing. The Office believes that many of these ads do an excellent job of raising awareness of energy efficiency issues, but offers the following suggestion and critique.

Attachment B, page 1 related to Cool Keeper (attached) reads:

**"COOL KEEPER MANAGES ELECTRICTY DEMAND ON HOT DAYS."**

It's a wireless device that connects to your AC unit and during hot afternoons it turns your AC off and on every 15 minutes. You stay cool and it helps us manage peak energy demand and energy costs. Installation is free and you get a \$20 thank you credit each year. It's wattsmart. To learn more, go to [wattsmart.com](http://wattsmart.com).

The ad does not provide a well stated description of Cool Keeper nor does it appear to be convincing to potential participants. The focus and explanation for this program needs to be improved. The Office is concerned that uninformed customers will not be convinced that they can "stay cool" after they read that the program turns their air conditioner on and off every 15 minutes during the hottest days. The Company has often touted the value of the Cooler Keeper program and the ads must be improved to increase participation and maximize potential value. The Office has long supported the Cool Keeper program, but has also emphasized in recent filings and forums that the education and outreach surrounding the program must be increased and improved. We are concerned that the efforts to date do not accomplish that goal.

Attachment B, pages 9 and 10 show a power strip graphic. As this education program moves forward, the Office would like to see this used as one of the more descriptive ads so that the average consumer understands it isn't just a generic reference, but a reference to the savings associated with reducing vampire energy associated with a lot of electronics and appliances.

## Recommendations

The Office recommends the Commission:

- 1) Require the Company to provide the variance report as ordered in the Commission's November 9, 2009 Order.
- 2) Require the Company to provide more granularity regarding expenses and budget in future filings.
- 3) Require the Company to work with interested parties to improve advertising regarding the Cool Keeper Program and provide more descriptive ads for vampire energy.