



State of Utah  
Department of Commerce  
Division of Public Utilities

FRANCINE GIANI  
*Executive Director*

THOMAS BRADY  
*Deputy Director*

CHRIS PARKER  
*Director, Division of Public Utilities*

GARY HERBERT.  
*Governor*  
GREG BELL  
*Lieutenant Governor*

## ACTION REQUEST RESPONSE

To: Public Service Commission of Utah

From: Division of Public Utilities  
Chris Parker, Director  
Energy Section  
Artie Powell, Manager  
Brenda Salter, Technical Consultant  
Abdinasir Abdulle, Technical Consultant

Date: April 17, 2013

Re: **Recommendation—Acknowledgement:** Rocky Mountain Power's Utah Demand-Side Management Semi-Annual Forecast for 2013, Docket No. 10-035-57. The Division recommends acknowledgement of the DSM 2013 forecast.

---

### RECOMMENDATION (Acknowledgement)

The Division of Public Utilities (Division) recommends that the Commission acknowledge the 2013 Semi-Annual Forecast filed by Rocky Mountain Power (Company) as being in compliance with the Commission Order of August 25, 2009 in Docket No. 09-035-T08 approving the Phase I stipulation.

### ISSUE

The Company filed its 2012 Demand-Side Management Semi-Annual Forecast Report on November 28, 2012. As requested by the Office of Consumer Services (Office) and the Division, the Company subsequently filed two supplemental filings the first on January 31,

2013 and the second on April 3, 2013. The Division conditionally acknowledged the DSM Semi-Annual Forecast Report pending compliance with Commission orders. On April 8, 2013 the Commission issued an Action Request requesting the Division review the supplemental filing for compliance with the Commission's Order issued March 1, 2013. This memorandum is in response to the Commission's Action Request.

## **DISCUSSION**

Based on the recommendations of the Division and the Office, the Commission issued an Order directing the Company to prepare a supplementary filing within 90 days of the order reporting savings estimates for the 2013 DSM Irrigation Load Control program both in terms of total program participation and contribution to system peak.

The Company's Supplemental Attachment 2 provides an estimate in terms of program participation and contribution to system peak. The system peak is provided as a range estimate and not a point estimate. The Company has stated that it cannot predict the system peak day and hour in advance therefore the range is intended to provide the peak information in the most accurate manner. These estimates are based on evaluated results of the Idaho irrigation program and not Utah results. In reviewing the information provided it appears that the requested reporting of the contribution to peak is not well defined at this time. The Company has entered into an agreement with EnerNoc who will be able to provide actual loads available for curtailment over the summer control period. With the additional data that EnerNoc purports it can provide, more accurate irrigation program impact forecasts could be available in subsequent DSM forecasts. The Division believes the Company has answered the above Commission Order to the best of their ability at this time. The Division requests this issue be returned to the DSM Steering Committee for further review in the 2014 filing.

The Company's Supplemental Attachment 1 provides the correction to the planning assumption forecast to align it with the planning source document that was referenced in the 2012 RFP.

**CONCLUSION**

Based on its review of the Company's filing, the Division concludes that Company's 2013 Semi-Annual Forecast complies with Commission Orders. The Division recommends acknowledgement of the DSM Semi-Annual Forecast for 2013.

CC: Carol Hunter, RMP  
Dave Taylor, RMP  
Michele Beck, OCS