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DEPARTMENT OF COMMERCE  
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To: The Public Service Commission of Utah

From: The Office of Consumer Services  
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Chris Parker, Director  
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Date: June 4, 2012

Subject: Docket No. 12-035-57, 2011 Annual Energy Efficiency and Peak Load Reduction Report

### Background

Rocky Mountain Power (Company) filed with the Public Service Commission of Utah (Commission) the 2011 Annual Energy Efficiency and Peak Load Reduction Report (Report) on April 30, 2012. On February 8, 2012, the Cost-Effectiveness Sensitivity Subcommittee of the DSM Advisory Group (Subcommittee) met and discussed whether certain costs should be treated as part of program costs, customer segment costs or portfolio costs in determining cost effectiveness. The Subcommittee requested additional time to consider the Company's request, and tabled the issue until the next Subcommittee meeting scheduled for March 14, 2012. The Company filed a request for extension with the Commission on March 6, 2012 to extend the due date from March 31, 2012 to April 30, 2012. The Commission ordered an extension of the Report to April 30, 2012.

### Discussion

The Company incorporated the feedback received in various dockets and DSM subcommittee meetings. For example, the Company included how deemed savings was estimated within each DSM Program. The Strategic Outreach and Communications Report is now contained within the Report. The Company also included in appendices, detailed information about cost-effectiveness, Class 2 DSM MW contribution estimates

and Nexant's Self-Direction Credit Program Administrator Report. This improved the information and delivery of the content in the Report.

The Office notes two minor issues that need correction or clarification.

The first item is a correction on page 19 of the Report. Table 6 reports the information as "MW under control" instead of "KW under control."

Next, in Appendix 1 – Cost Effectiveness, the Company reports cost-effectiveness for the total portfolio, by customer type, and DSM class. On page 8 of the Report, the Company reports the total portfolio and customer type results, but not the DSM class results. The Report could be clarified by including that the Load Management Portfolio passed all cost-effectiveness tests and that the Energy Efficiency Portfolio passed all cost-effectiveness tests except the RIM test within the summary on page 8. The Office recommends that the Company report separately on the cost-effectiveness of the Load Management and Energy Efficiency portfolios in reporting cost-effectiveness in this summary section on page 8 of the Report.

### Recommendations

The Office recommends the following:

1. Correct Table 6 from MW to KW
2. Include Load Management and Energy Efficiency portfolio cost-effectiveness in reporting cost-effectiveness on page 8 of the Report.