

December 19, 2013

***VIA ELECTRONIC FILING
AND HAND DELIVERY***

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT84114

Attention: Gary Widerburg
Commission Secretary

Re: Reply Comments Demandside management Nov. 1st deferred account and
forecast reporting– Docket No. 13-035-183

On November 4, 2013 the Public Service Commission (“Commission”) issued a notice of filing and comment period for Docket 13.035.183, In the Matter of Rocky Mountain Power’s Annual Demand Side Management Deferred Account and Forecast Reporting. Rocky Mountain Power (“Company”) would like to provide clarification based on comments received by the Commission from the Division of Public Utilities (“Division”) and the Office of Consumer Services (“Office”).

In the comments dated December 4, 2013 from the Division of Public Utilities, they state, “The Company’s 2014 DSM forecast deviates from the 2013 IRP in that the expected MW for the Cool Keeper program are 11 MW less than the IRP target. The Company failed to provide an explanation for this deviation as directed in the Commission’s Order in Docket 10-035-57. The Division recommends that the Company provide an explanation for the deviation.”

The impact of the Cool Keeper program has declined over the last three years primarily as a result of the structure of and requirements under the Company’s previous contract with former program delivery vendor, Comverge. The pay-for-performance contract required Comverge to maintain a minimum of 80 percent of the program’s participation during the maintenance period of the contract (years 7-10). As the end of the contract term approached Comverge managed the program in line with contract requirements that allowed for degradation in program participation in years 7-10. This contract provision recognized the decline in their ability to recover late program replacements/investments should they not be awarded another contract term.

The 120 MW noted in the 2013 IRP was an estimate of “existing” program capabilities at the time the IRP modeling began in 2012 (see “Table 5.10 - Existing DSM Summary, 2013-2022” in Volume I of the Company’s 2013 Integrated Resource Plan). It was based on a conservative average of 2011 and 2012 program performance of 129 MW and 115 MW, respectively. Preliminary performance results of the program’s 2013 results (final year of the Comverge

Public Service Commission of Utah

December 19, 2013

Page 2

contract) are in the 108-110 MW range. The Company's 2014 program forecast assumes maintaining the program's 2013 participation and impact as we transition the program to a new delivery and communication platform; adjusted for possible variations in impact due to weather related factors.

In comments dated December 4, 2013, the Office makes note of an expenditure increase of \$1.1 million for program evaluations. The Office submitted a data request regarding this increase. The Company response is attached hereto as Exhibit A. As noted in our response, there has not been a \$1.1 million increase in expenditures for evaluations.

An original and 10 copies of are provided of the Company's reply.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: DataRequestResponseCenter
PacifiCorp
825 NE MultnomahBlvd., Suite 2000
Portland, OR97232

Informal inquiries may be directed to Lisa Romney, Regulatory Projects Manager, at (801) 220-4425.

Sincerely,

Kathryn Hymas
Vice President, Finance and Demand Side Management

Cc: Division of Public Utilities
Office of Consumer Services

Enclosures