

August 20, 2014

UTAH PUBLIC SERVICE COMMISSION  
Heber M. Wells Building  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, Utah 84111

**Re: Docket No. 14-035-102, In the Matter of Rocky Mountain Power's Semi-Annual Demand-Side Management (DSM) Forecast Reports**

Dear Public Service Commission,

On July 22, 2014 Rocky Mountain Power (“Company”) filed with the Public Service Commission (“Commission”) its semi-annual Utah DSM tariff rider balancing account analysis, pursuant to Commission order in Docket No. 09-035-T08. On July 30<sup>th</sup>, 2014 the Company submitted a revised DSM tariff rider balancing account analysis using an AFUDC rate of 7.77% instead of 7.83% for 2015.

While Utah Clean Energy and SWEEP haven’t conducted a financial analysis of the Company’s semi-annual DSM forecast report, we generally support the projected growth in the Company’s forecasted DSM budget and the rate at which the Company has and continues to expend its DSM balance.

The increase in the Company’s demand-side management budget and associated “spend down” of the DSM balance reflects the ongoing importance of DSM investments in cost-effectively meeting current and future energy demand in Utah. Specifically, increased DSM investments will be needed to meet the amount of DSM resources recently identified in the following documents:

- the “high efficiency” scenario modeled in the 2013 IRP;
- the company’s DSM commitments in its IRP Action Plan to achieve this level of savings; and
- the draft findings of the 2015 DSM potential study.

We understand that part of the budget increase may be associated with front-loaded DSM expenses for program re-design and/or expansion (e.g., Cool Keeper expansion). UCE and SWEEP are supportive of these front-loaded budget increases since they are necessary to enable re-designed and/or expanded cost-effective DSM programs.

Without information about the corollary MWh and MW reduction forecasts for the budget and time period reflected in the analysis, it’s difficult to provide more detailed comments. We have two requests for the Commission to consider, which would provide a



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more complete picture of the energy and demand reductions associated with the current and forecasted DSM expenditures:

- 1) We request that the Company include a revised forecast for MWh and MW savings in this filing for the budget and time period reflected in this balancing account and projected expenses report.
- 2) Likewise, in future filings we request that the Company include the forecasted MWh and MW savings associated with the budget and time period reflected in the balancing account and projected expenses report.

Sincerely,

/s/ Kevin Emerson

Kevin Emerson

UTAH CLEAN ENERGY



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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 20<sup>th</sup> day of August, 2014 on the following:

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/s/ Sophie Hayes