

September 2, 2014

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

Re: Reply Comments Docket No. 14-035-102  
Semi-Annual Demand-Side Management (DSM) Forecast Reports

On July 30, 2014 the Public Service Commission (“Commission”) issued a notice of filing and comment period in the Matter of Rocky Mountain Power’s Semi-Annual Demand-Side Management (DSM) Forecast Reports. Rocky Mountain Power (“Company”) would like to provide reply comments to address the comments received from Utah Clean Energy.

In the comments dated August 20, 2014 from Utah Clean Energy, they provide two requests for the Commission to consider. The first request is, “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.” The second request is that the Company also provide that information in future reports.

While the Company respects Utah Clean Energy’s request for this additional information, the Company respectfully objects to the request for a couple reasons: (1) The stipulation in Docket No. 09-035-T08 (Advice No. 09-08) under which this report is required, was intended to provide financial information, rather than serve as a mid-year reforecast of the annual November filing. In support of this assertion in the stipulation in Docket No. 09-035-T08 (Advice No. 09-08) parties, including Utah Clean Energy, agreed that the Company would provide a DSM deferred account analysis (similar to the one provided in Advice No. 09-08) to the Commission and the DSM Advisory Group every six months. The parties also agreed that the Company would provide to the Commission and the DSM Advisory Group by November 1 of every year a forecast of expenditures for approved programs and their acquisition targets (in MWh and MW) for the next calendar year, and (2) Reforecasting for variations in the annual MWH and MW every six months would be administratively burdensome to the Company and our delivery contractors. For most of the Company’s programs, the reforecast would only indicate a change in the timing of when the resources would be acquired, rather than a change in the total MWH or MW that will be acquired.

Currently, the Company provides an annual forecast; financial, energy and capacity, each November for the coming year. We provide monthly balancing account reports throughout the year, and produce an annual report at the end of the year that includes variance reporting and explanations of key differences between the Company’s November forecast and actual results. In

Public Service Commission of Utah

September 2, 2014

Page 2

addition, throughout the year we meet at least quarterly with our DSM Advisory Group or Steering Committee to review the Company's demand-side management programs and variations in our forecasts/expected performance. Any of the Company's programs that are significantly over-delivering or under-delivering are reviewed in these meetings.

For these reasons, the Company feels the additional information is not necessary or warranted. The Company would be willing to include in the next semi-annual report a column restating the annual MWh and MW savings forecasts provided in the November 1 filing, if parties feel this would be helpful.

An original and ten (10) copies are provided of the Company's reply. The Company will also provide electronic versions to [psc@utah.gov](mailto:psc@utah.gov).

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

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

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah St., Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Michael Snow, DSM Regulatory Projects Manager, at (801) 220-4214.

Sincerely,

Kathryn Hymas  
Vice President, Finance and Demand-side Management

Cc: Division of Public Utilities  
Office of Consumer Services