

July 3, 2018

***VIA ELECTRONIC FILING***

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**  
In the Matter of Rocky Mountain Power's Demand-Side Management 2017 Annual Energy Efficiency and Peak Load Reduction Report  
Docket No. 18-035-19

On May 18, 2018, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment period in the above referenced matter, allowing parties to file comments by June 18, 2018, and reply comments by July 3, 2018. The Division of Public Utilities (“DPU”) and Office of Consumer Services (“OCS”) filed comments June 18, 2018. The DPU’s and OCS’ comments both recommended acknowledgement/approval of the 2017 Annual Energy Efficiency and Peak Load Reduction Report. OCS’ comments had additional requests regarding future reporting requirements. Rocky Mountain Power (the “Company”) provides these reply comments in response to OCS’ additional requests.

OCS requested that future reports contain the following information:

1. include an explanation of the connection between the decrements used in the cost effectiveness analysis and avoided cost;
2. explain the variation in the cost effectiveness evaluation of the Cool Keeper measure; and
3. include the expected year of publication of evaluations in the Progress Status column of evaluation reports.

The Company finds these requests reasonable, and therefore agrees to provide this information in future reports.

OCS’ final request was to require the Company to “*coordinate the timing of program evaluations to occur in advance of RFPs regarding the administration of such programs.*” Program evaluations are currently conducted every two years, rotating between residential and non-residential programs, while the Company’s program contracts are typically in place for 3-year terms with optional 2-year extensions. RFP processes can begin anywhere from six to nine months prior to the expiration of a program contract. With the various timings for program evaluations, program contracts, and RFP processes, the Company does not believe it reasonably possible under

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the current structure to coordinate the timing of completed program evaluations in advance of RFPs.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is written in a cursive style with a long, sweeping tail on the "w".

Michael S. Snow

Manager, DSM Regulatory Affairs

**CERTIFICATE OF SERVICE**

Docket No. 18-035-19

I hereby certify that on July 3, 2018, a true and correct copy of the foregoing was served by electronic mail to the following:

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**Rocky Mountain Power**

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Jennifer Angell  
Supervisor, Regulatory Operations