

December 18, 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 Semi-Annual Demand-Side Management  
(DSM) Forecast Reports – Docket No. 18-035-27

On November 5, 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 December 3, 2018, and reply comments by December 18, 2018. The Division of Public Utilities (“DPU”), Office of Consumer Services (“OCS”), and Utah Clean Energy (“UCE”) filed comments December 3, 2018. DPU’s and OCS’ comments recommend acknowledgement that the filing is in compliance with Commission requirements. UCE’s comments did not make a recommendation, but rather stated various concerns over processes and DSM acquisition. Rocky Mountain Power (the “Company”) provides these reply comments in response to UCE’s comments.

Given that the Integrated Resource Plan (“IRP”) is the source for determining appropriate levels of DSM acquisition as a lowest-cost resource, the IRP process is an appropriate forum for UCE to discuss energy savings levels and to address their concerns with IRP recommendations. The pursuit of cost-effective DSM beyond the IRP recommended levels has been discussed on multiple occasions during DSM Steering Committee meetings in which UCE has participated.

The Company’s intent is to manage the DSM portfolio to achieve the savings recommended by the IRP. Continual improvement is critical, and the Company is continually evaluating and seeking out new technologies and other ways to improve the way it delivers energy savings as a resource. If new programs, technologies, or other opportunities become available and are cost-effective, they will be pursued and added to the portfolio, if approved by the Commission. If new programs and technologies are added, the intent is to still manage the portfolio to achieve the IRP recommended resource savings. The energy industry is evolving rapidly, and programs and technologies traditionally driving energy efficiency will change with market evolution and industry standards, however the principle that guides the Company’s resource planning today is the acquisition of IRP-prescribed energy savings amounts passing industry standard cost-effectiveness testing.

Public Service Commission of Utah

December 18, 2018

Page 2

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is fluid and cursive, with the first name being the most prominent.

Michael S. Snow

Manager, DSM Regulatory Affairs

Enclosures

**CERTIFICATE OF SERVICE**

Docket No. 18-035-27

I hereby certify that on December 18, 2018, a true and correct copy of the foregoing was served by electronic mail to the following:

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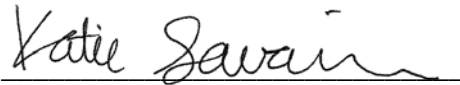
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**Rocky Mountain Power**

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