



## State of Utah

GARY R. HERBERT  
*Governor*

SPENCER J. COX  
*Lieutenant Governor*

## Public Service Commission

THAD LeVAR  
*Chair*

DAVID R. CLARK  
*Commissioner*

JORDAN A. WHITE  
*Commissioner*

August 6, 2019

Ms. Jana Saba  
Rocky Mountain Power  
1407 W North Temple, Suite 330  
Salt Lake City, UT 84116

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

Re: *Rocky Mountain Power's Demand-Side Management 2018 Annual Energy Efficiency and Peak Load Reduction Report; Docket No. 19-035-22*

Dear Ms. Saba:

The Public Service Commission (PSC) reviewed Rocky Mountain Power's (RMP) June 18, 2019 filing of its Demand-Side Management 2018 Annual Energy Efficiency and Peak Load Reduction Report ("Report"). The PSC also reviewed the comments of the Division of Public Utilities (DPU) and the Office of Consumer Services (OCS) filed on July 18, 2019, the joint comments filed by Utah Clean Energy and the Southwest Energy Efficiency Project ("UCE/SWEEP") on July 19, 2019, and the reply comments filed by RMP on August 5, 2019.

The DPU concludes the Report complies with the PSC's reporting requirements and recommends acknowledgement. The DPU recommends the PSC require RMP to complete a Utah Line Loss analysis for the Demand-Side Management (DSM) Program at least every five years to keep up with RMP's changing infrastructure.

The OCS recommends the PSC acknowledge the Report as satisfying the PSC's reporting requirements. The OCS also recommends that in future reports the PSC should require RMP to: 1) explain the reasons for any differences in the amount of Class 2 MWh savings reported; 2) include a clear explanation of the relationship between the decrements used in the cost effectiveness analysis and avoided cost; 3) explain the cause of significant year-over-year declines in reported savings and remedies being considered, if appropriate; and 4) explain the meaning of the line "Total Class 2 w/incremental HER savings" on the Forecast to Actual Savings Table.

UCE/SWEEP asserts that reductions in energy savings in 2018, when compared to previous years, are not in the public interest. UCE/SWEEP encourages RMP to seek all cost-effective energy efficiency that exceeds the target identified in RMP's Integrated Resource Plan (IRP).

In its reply comments, RMP states it is currently working towards updating its line loss study and anticipates it will be completed in 2020. Further RMP believes the OCS's recommendations 1, 2, and 4 are reasonable and will make best efforts to provide the information in future reports. Regarding the OCS's recommendation 3, RMP believes it is not necessary to provide an explanation as the portfolio is simply being managed to achieve its forecast savings targets year-over-year. RMP affirms it would provide an explanation if the reported savings for a given year were significantly below the forecast savings targets.

Regarding UCE/SWEEP's request that RMP seek all cost-effective energy efficiency exceeding IRP targets, RMP states the IRP is the source for determining appropriate levels of DSM acquisition as a lowest cost resource and RMP's intent is to achieve the savings recommended by the IRP. Further, RMP states it is continually evaluating and seeking out new technologies and other ways to improve delivery of energy savings as a resource and that it will pursue new programs, technologies, or other opportunities that become available and are cost effective.

Based on the PSC's review of the Report and the recommendations filed by the DPU and the OCS, the PSC acknowledges the Report as complying with the PSC's reporting requirements. The PSC accepts and adopts RMP's commitments to provide additional information in future DSM reports and to complete a line loss study, no later than 2020.

Sincerely,

/s/ Gary L. Widerburg

PSC Secretary

DW#309473