

July 31, 2019

Docket No: 19-035-28

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84111

Re: Docket No. 19-035-28—In the Matter of Rocky Mountain Power’s Semi-Annual Demand-Side Management (DSM) Forecast Reports

Utah Clean Energy (UCE) and the Southwest Energy Efficiency Project (SWEET) support Rocky Mountain Power’s (RMP) proposal to *not* make a change to the Schedule 193 collection rate. However, we are again concerned that Rocky Mountain Power has collected funds from ratepayers but is not on track to fully spend its budget on cost-effective energy efficiency programs.

According to the 2018 annual report, RMP spent \$49 million on 2018 DSM programs, but originally budgeted \$61.3 million in its November 2017 forecast, then \$58.1 million in its July 2018 forecast, and then \$51.8 million in its November 2018 forecast.¹ RMP failed to meet its original forecasted budget at a time when there was additional demand for energy efficiency projects, while decreasing incentives to ramp-down participation in existing cost-effective programs such as the non-residential lighting program.

UCE and SWEET respectfully request that the Commission order Rocky Mountain Power to explain why it underspent on DSM in 2018, and what, if any, measures the Company is taking to ensure that its 2019 forecasted budget will be fully spent on cost-effective DSM programs. Further, we also request that the Commission direct the Company to work with the DSM Steering Committee to identify a shortlist of cost-effective DSM programs that can be rapidly deployed to re-direct unspent collected funds toward immediate additional electricity

¹ Docket 19-035-22, Rocky Mountain Power’s Demand-Side Management 2018 Annual Energy Efficiency and Peak Load Reduction Report, page 8, table 3, *found at* <https://pscdocs.utah.gov/electric/19docs/1903522/308805RedRMPDmdSideMngnt2018AnEngyEffPLoadRedRepor t6-18-2019.pdf>; Docket 18-035-27, Rocky Mountain Power’s Semi-Annual Demand-Side Management (DSM) Forecast Reports, page 8, attachment 3, *found at* <https://pscdocs.utah.gov/electric/18docs/1803527/305348RMPAnnDemSidMgmtDefAcctFrstRep11-1-2018.pdf>.

savings with the goal to maximize cost-effective savings in 2019. For example, a school LED blitz to retrofit inefficient lighting in classrooms and other school facilities.

Cost-effective energy efficiency is in the public interest and ratepayers deserve to have all funds collected for energy efficiency programs invested in cost-effective DSM programs. To that end, UCE and SWEEP respectfully ask that the Public Service Commission take the two actions discussed above.

Sincerely,

/s/ Kevin Emerson
Energy Efficiency Program Director
Utah Clean Energy

/s/ Justin Brant
Senior Associate
Southwest Energy Efficiency Project

CC:

Michael Snow, RMP
Chris Parker, DPU
Cheryl Murray, OCS