

**December 2, 2019**

**Docket No: 19-035-28**

**VIA ELECTRONIC FILING**

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> 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 (SWEEP) are submitting these joint comments in response to the Utah Public Service Commission’s notice for comments issued on November 5, 2019. We appreciate the opportunity to provide comments on Rocky Mountain Power’s (the “Company”) Annual Demand Side Management Deferred Account and Forecast Report (the “2020 Forecast Report”).

### **DSM Spending and Savings in 2019**

In its November 2018 forecast report Rocky Mountain Power estimated investing over \$64.6 million in 2019 DSM programs and saving 298,720 MWh of electricity.<sup>1</sup> Yet in the 2020 Forecast Report the Company reports that it will underspend by about \$8.7 million for its 2019 DSM programs.<sup>2</sup> We believe that RMP is leaving cost-effective DSM on the table. According to available recent data, the Company’s DSM programs continue to be very cost-effective, with a 2.39 benefit/cost ratio (UCT).<sup>3</sup> Investing and saving less than forecasted is not in the public interest.

### **Class 1 DSM**

In the 2020 Forecast Report, Rocky Mountain Power forecasts 119 MW from the Cool Keeper air conditioner load control program. However, in 2018 Rocky Mountain Power began

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<sup>1</sup> Docket 18-035-27, RMP 2019 DSM Forecast Report, filed November 1, 2018, page 9, *found at* <https://pscdocs.utah.gov/electric/18docs/1803527/305348RMPAnnDemSidMgmtDefAcctFrcstRep11-1-2018.pdf>.

<sup>2</sup> Docket 19-035-28, RMP’s Annual Demand Side Management November 1<sup>st</sup> Deferred Account and Forecast Reporting, page 5, *found at* <https://pscdocs.utah.gov/electric/19docs/1903528/310866RMPAnlDmndSdMngmntDfrdAcuntFrcstRprt11-1-2019.pdf>.

<sup>3</sup> Docket 19-035-22, RMP’s 2018 Utah Energy Efficiency and Peak Reduction Report, page 49, table 4, *found at* <https://pscdocs.utah.gov/electric/19docs/1903522/308805RedRMPDmdSideMngnt2018AnEngyEffPLoadRedReport6-18-2019.pdf>.

utilizing this resource in a different manner, increasing the value the Company receives from the program and the MW reduction available from the program. Through these changes Rocky Mountain Power was able to achieve 239 MW in demand reduction in 2018, while dramatically increasing the cost-effectiveness of this program.<sup>4</sup> Indeed, this success recently received national recognition by the Peak Load Management Alliance.<sup>5</sup> Given the value available from this program we recommend Rocky Mountain Power increase the target for the Cool Keeper program and prioritize recruiting new customers instead of maintaining or decreasing participation as proposed by Rocky Mountain Power in the 2020 Forecast Report.

### **Class 2 DSM**

In the 2020 Forecast Report, Rocky Mountain Power forecasts 301,246 MWh of Class 2 electricity savings for 2020, with an estimated range between 286,184 to 316,308 MWh. We're encouraged to see that the amount of Class 2 DSM forecasted in the 2020 Forecast Report is above the amount of Class 2 DSM selected in the 2019 IRP for the year 2020 (254,270 MWh).<sup>6</sup>

### **Investing unspent funds in rapidly deployable DSM program**

In our July 2019 comments, we recommended that Rocky Mountain Power and the Rocky Mountain Power DSM Steering Committee identify a list of possible rapidly-deployable DSM programs to re-direct unspent funds toward.<sup>7</sup> In response RMP committed to gather input from the Steering Committee.<sup>8</sup> As requested by UCE and SWEEP, RMP convened a phone meeting of the DSM Steering Committee on November 21, 2019 to discuss several proposals suggested by UCE and SWEEP. We understand that in its upcoming Schedule 193 filing Rocky Mountain Power will include a proposal to hold a portion of the unspent funds in the balancing account to reinvest in new DSM savings in early 2020. We appreciate Rocky Mountain Power's efforts to accommodate our earlier request.

Sincerely,

*/s/ Justin Brant*  
Senior Associate  
Southwest Energy Efficiency Project

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<sup>4</sup> Id. at page 8, table 3.

<sup>5</sup> 16th PLMA Award Winners in April 2019, *found at* <https://www.peakload.org/2019-winners>.

<sup>6</sup> Docket 19-035-02, RMP 2019 IRP Supplemental Filing on November 4, 2019, page 4, table D.4, *found at* <https://pscdocs.utah.gov/electric/19docs/1903502/310538RMP2019IRPSupplFi10-25-2019.pdf>.

<sup>7</sup> Docket 19-035-28, UCE and Sweep Comments filed on July 31, 2019, *found at* <https://pscdocs.utah.gov/electric/19docs/1903528/309417ComntsfrmUCEandtSWEEP7-31-2019.pdf>.

<sup>8</sup> Docket 19-035-28, RMP Reply Comments filed on August 15, 2019, *found at* <https://pscdocs.utah.gov/electric/19docs/1903528/309528RMPRplCmnts8-15-2019.pdf>.



*/s/ Kevin Emerson*  
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