

December 17, 2019

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th 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. 19-035-28

On November 5, 2019, 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 2, 2019, and reply comments by December 17, 2019. The Division of Public Utilities (“DPU”) and Office of Consumer Services (“OCS”) filed comments December 2, 2019, and Utah Clean Energy (“UCE”) and Southwest Energy Efficiency Project (“SWEEP”) also filed joint comments December 2, 2019.

The DPU’s comments recommend acknowledgement that the 2020 Forecast Report is in compliance with Commission requirements, as well as recommendations that the Company include reference information for all Integrated Resource Plan (“IRP”) values and update the current and future reports to account for the Cool Keeper 100 percent cycling.

The OCS’ comments also recommends that more precise IRP references are included in future reports, as well as additional information on how the IRP Class 1 MW savings are determined in the Company’s reply comments in this docket. The OCS also pointed out a calculation error in Attachment 1 of the Company’s 2020 Forecast Report.

UCE/SWEEP’s joint comments raise a concern over the potential for the Company’s portfolio to be underspent with achieved savings less than forecasted. The Company has held numerous discussions with the DSM Steering Committee regarding the 2019 savings and spending trends, and what the Company is doing in an effort to achieve its targets. The Company’s actual spending and savings for 2019 will be fully addressed in its Annual Energy Efficiency and Peak Load Reduction Report for 2019. UCE/SWEEP’s comments also recommend the Company’s Cool Keeper program target be increased from what is stated in the 2020 Forecast Report.

In response to party comments, attached hereto as Exhibit A is a revised Attachment 1 from the 2020 Forecast Report, which includes specific references for IRP values, an updated Cool Keeper forecast accounting for the 100 percent cycling, and a corrected calculation to the error OCS referenced. It should be noted that the 2019 IRP does not currently account for the 100 percent cycling method for Cool Keeper, which is why the Company’s updated forecast in Exhibit A does

not align with the 2019 IRP. The Company will investigate how the 100 percent cycling assumptions may be incorporated into subsequent IRPs to account for the new method.

Additionally, the DSM group provides the IRP team with existing Class 1 DSM program impacts (i.e., residential/small commercial air conditioner (A/C) load control and irrigation load management), which represents the estimated maximum realized MW (gross – at gen) demand impacts (kW) during the course of an event, which can be found in the 2019 IRP, Volume 1, Table 5.11. The IRP team provides the DSM team incremental Class 1 MW target selections (i.e., above the Class 1 existing resources) to the DSM group through its Preferred Portfolio, which can be found in the 2019 IRP Volume 2, Table D.3. With respect to how incremental selections are selected, this process is discussed in the 2019 IRP, Volume 1, Chapter 6.

The Company believes these reply comments and Exhibit A address parties' recommendations, however, if there is a more desirable format for the delivery of this information within the report, the Company will discuss with Steering Committee members and make any updates as necessary for future reports.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is written in a cursive style with a long horizontal flourish at the end.

Michael S. Snow
Manager, DSM Regulatory Affairs

Enclosures

Exhibit A

Revised Attachment 1

Revised Attachment 1
2020 Forecast Savings compared to Resource Plan Targets

	2020 Program Forecast		2019 Integrated Resource Plan	
	MWH @ Gen 2020	MW 2020	MWH 2020	MW 2020
Class 1 DSM - Residential, Commercial, Industrial				
Air Conditioner Load Control - Res. & Small Com. (Sch. 114)		239		119
Irrigation Load Control - Industrial (Sch. N/A)		20		20
Total Class 1		259		139
Class 2 DSM - Residential				
Low Income (Sch. 118)	178	0	N/A	N/A
Home Energy Reporting (Sch. N/A)	36,010	5	N/A	N/A
wattsmart Homes (Sch. 111)	67,071	10	N/A	N/A
Total Class 2 Residential	103,259	15	N/A	N/A
Class 2 Non-Residential Programs				
wattsmart business (Sch. 140)	197,987	29	N/A	N/A
Total Class 2 Non-Residential	197,987	29	N/A	N/A
Total Class 2	301,246	43.50	254,270	36.72
Total Class 2 Estimated Range	286,184 - 316,308			
Total Class 2 (with HER Incremental Savings)	241,557 - 266,984			38.30

Notes:

1. Class 1 DSM A/C Load Control: 2019 IRP Vol. 1 Table 5.11 pg. 107 lists 122 MW of existing capacity for air conditioner load, and is inclusive of a 6% reserve. For purposes of the DSM 2020 Forecast Report, the 6% reserve is not included, making the existing capacity 115 MW. Additionally, 2019 IRP Vol. II Table D.3 pg. 72 lists 4.1 MW of incremental capacity for Utah air conditioner load, making the overall 2020 forecast 119 MW (115 MW of existing capacity + 4.1 MW of incremental capacity).
2. Class 1 DSM Irrigation Load Control: 2019 IRP Vol. 1 Table 5.11 pg. 107 lists 205 MW of existing capacity for irrigation load, 20 MW of which is in Utah, as specified in Note 1 under Table 5.11. Additionally, 2019 IRP Vol. II Table D.3 pg. 72 lists no incremental capacity for Utah irrigation load, making the overall 2020 forecast 20 MW.
3. Class 2 DSM resource plan results are not selected at a program level (no program level IRP targets available).
4. Irrigation forecast represents highest expected realized value during the season (see "Irr Prgm Impact" tab for an estimate by week throughout season).
5. Air conditioner load control (Cool Keeper) forecast represents the expected contribution/impact available at peak, temperature dependent.
6. Total Class 2 DSM: 2019 IRP Vol. II Table D.4 pg. 72 selected 254,270 MWh of energy efficiency for 2020.
7. Forecast of coincident peak MW for **Utah's** Class 2 DSM resource is derived through the following formula:

Forecasted Class 2 DSM energy savings	301,246	MWh
Divided by 2020 Utah energy selections from the 2019 IRP Appendix D	254,270	MWh
Multiplied by Utah 2020 coincident peak value from the 2019 IRP	36.72	MW
Estimated coincident peak impact of 2020 Utah Class 2 DSM programs	43.50	MW
8. 2019 IRP Utah 2020 Energy Efficiency coincident peak contribution derived from data contained in 2019 IRP Vol. 1 Table 8.19 pg. 259. See workpapers in support of 36.72 calculation.
9. Savings is at generation.

CERTIFICATE OF SERVICE

Docket No. 19-035-28

I hereby certify that on December 17, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

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