

December 17, 2020

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 Administrator

Re: **Reply Comments**
In the Matter of Rocky Mountain Power's Semi-Annual Demand-Side Management
(DSM) Forecast Reports – Docket No. 20-035-31

On November 4, 2020, 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, 2020, and reply comments by December 17, 2020. The Division of Public Utilities (the “Division”) filed comments November 25, 2020, and Utah Clean Energy (“UCE”) and Southwest Energy Efficiency Project (“SWEEP”) filed joint comments December 2, 2020.

The Division’s comments recommend acknowledgement that the Company’s filing complies with Commission Orders. UCE/SWEEP’s comments raise concerns with respect to using behavioral measures to satisfy the Class 2 DSM savings selected by the Integrated Resource Plan (“IRP”), given that the 2019 IRP modeling did not include savings from behavioral programs and instead included behavioral program savings in the baseline load forecast.

DISCUSSION

Historically, the IRP has included incremental savings from the Home Energy Report’s (“HER”) Program in its modeling. Accordingly, the Company’s Annual DSM Deferred Account and Forecast Reports have included a separate savings forecast line item to account for HER incremental savings, including the 2021 Forecast Report filed in this docket November 2, 2020. To clarify, incremental HER savings is the increase in savings year over year. If the HER Program achieves more savings than it did the previous year, the difference would be incremental. The 2017 reporting year was the last time the HER Program achieved incremental savings. The HER Program’s savings have declined since 2017, as depicted in Table 1 of UCE/SWEEP’s comments. The 2019 IRP assumed this same level of savings would be achieved in its modeling and included it in the baseline load forecast with no incremental savings, given that no expansions or changes to the HER Program were planned at the time. However, the 2019 IRP did not account for the COVID-19 pandemic. One of the adaptive actions the Company took to counter the impacts of

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COVID-19 was to increase direct outreach to customers by expanding the HER Program to any customer with an email address on file, as stated in the Company's recent compliance filing.¹

CONCLUSION

The expansion of the HER Program will yield incremental HER savings in 2020 and 2021. Given the need to adapt to achieve annual DSM targets, the Company believes that any incremental savings achieved by the HER Program should be accounted for as part of the Class 2 DSM portfolio.

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, Regulatory Affairs

Enclosures

¹ Submitted November 6, 2020 in Docket No. 20-035-31.

CERTIFICATE OF SERVICE

Docket No. 20-035-31

I hereby certify that on December 17, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

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