



September 18, 2020

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

RE: Docket No. 20-035-T07
Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Schedule No. 114,
Load Management Program
Initial Comments of Western Resource Advocates

On September 4 2020, the Public Service Commission ("Commission") issued a Notice of Filing and Comment Period requesting comments on Rocky Mountain Power's proposed tariff revisions to Schedule 114, Load Management Program. Western Resource Advocates (WRA) appreciates the opportunity to provide comments on this filing.

Background

On September 3, 2020, PacifiCorp (dba Rocky Mountain Power, "RMP") filed a proposal to modify its offerings under Electric Service Schedule 114, Load Management Program. In its Advice Letter, RMP proposed adding a Wattsmart Batteries Program to provide incentives for customer-sited, behind-the-meter batteries to be used for demand response and grid management services.

Since 2019, as part of the Sustainable Transportation and Energy Plan (STEP) pilot program, and in partnership with Wasatch Development, RMP has installed individual batteries in each unit of a 600 unit multi-family development called "Soleil Lofts." The batteries are charged by solar facilities located on site, and RMP has control of the batteries to deploy them as needed for system-wide demand response. This project has gained national attention as a model application of behind-the-meter battery storage that provides grid benefits to the entire RMP system. The currently-proposed Wattsmart Batteries Program is based on the experience RMP has gained from the Soleil Lofts project.

WRA is a member of RMP's Demand Side Management (DSM) Steering Committee and, in that capacity, has had several discussions with RMP since May of this year about the Wattsmart Batteries Program, its potential benefits, and the program design. WRA has reviewed, questioned, and advised RMP on this new program proposal, and the Company has been responsive to questions.

Comments and Recommendations

WRA supports commission approval of the Wattsmart Batteries Program. This new program, as designed, will provide a new demand response asset for RMP that will be useful during peak load times, as well as provide grid management benefits. The grid management component of this program, enabled by RMP's ability to control the batteries with its distributed battery grid management solution ("DBGMS"), is a promising value-add to traditional demand response benefits.

As currently proposed, RMP will “dispatch” customers’ batteries to offset their own load during periods of high demand. However, as explained in RMP’s application, the Company expects to enhance the dispatch parameters over time as the program matures and the utility gains experience, to add other capabilities “such as charging batteries during the day with excess solar and exporting the solar energy during peak times, in order to maximize benefits for all parties.” Advice Letter, page 2. WRA believes that the Company will gain important experience operating this program that will inform future demand response and grid management efforts.

We recommend that the Commission approve the Wattsmart Batteries Program. WRA is in fact holding up this proposed program as a good example for utilities in other states that are looking to develop similar programs. We recommend that the Company continue to provide updates about this program to the DSM Steering Committee and Advisory Group, and to recommend whether changes and enhancements are necessary or appropriate. For example, it is not yet known if the proposed incentives and dispatch parameters are sufficient to incent widespread program participation. Or, it may be appropriate to provide a battery “leasing” option for customers who cannot afford the up-front costs of purchasing a battery.

WRA looks forward to continuing to work with RMP as this program develops and evolves, and recommends that the Commission approve the proposed tariff revisions as filed.

Sincerely,

A handwritten signature in black ink that reads "Ken Wilson". The signature is written in a cursive style with a large, sweeping initial "K".

Ken Wilson
Engineering Fellow
Western Resource Advocates