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September 25, 2020

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> 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 Proposed Tariff Revisions to Electric Service Schedule No. 114, Load Management Program  
Docket No. 20-035-T07

On September 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 September 18, 2020, and reply comments by September 25, 2020. The Division of Public Utilities (“DPU”), Office of Consumer Services (“OCS”), Western Resource Advocates (“WRA”), and Utah Clean Energy (“UCE”) filed comments September 18, 2020. Rocky Mountain Power (the “Company”) provides these reply comments in response to comments filed by the aforementioned parties.

**PARTY RECOMMENDATIONS**

The DPU recommends approval of the Company’s proposed Wattsmart Batteries program and modifications to Schedule 114 (“Program”). The DPU also recommends there be continuous program oversight and reporting to coincide with the reporting of other DSM programs.

The OCS recommends approval of the Company’s filing, noting that ongoing review within the DSM Steering Committee will help ensure the Program runs as intended and to facilitate discussion for Program adjustments.

WRA recommends approval of the Program, indicating their intent to hold this Program up as a good example for utilities in other states looking to develop similar programs. WRA further recommends the Company continue to provide updates to the DSM Steering Committee and to use that forum to discuss any recommended changes as necessary.

UCE strongly supports the development of a battery demand response program in Utah, and recommends the Company address the following items as a condition of Program approval:

1. UCE is concerned that the broad dispatch parameters, which provide leeway to dispatch batteries up to two full duty cycles each day, may cause premature battery degradation and deter customer participation. UCE also notes that other utility program metrics provide a narrower or more specific scope for battery dispatch, and offer different incentives to customers based on parameters customers agree to.
2. UCE indicated that it would be helpful if the Company clarified whether customer batteries could be charged from the grid and if so, how customer bills would be affected.
3. UCE recommends the Company be required to file an amendment to the Program to incorporate dispatching customer batteries to the grid.

## **DISCUSSION**

In response to DPU's, OCS', and WRA's comments, the Company will incorporate the Program into the current reporting structure for DSM programs, and will continue to discuss the Program with Steering Committee members to facilitate changes, consistent with the management of other DSM programs.

With respect to UCE's comments, the Company offers the following responses to the items referenced above:

1. The proposed dispatch parameter of up to two full duty cycles per day is to act as a cap. The Company does not intend or expect to dispatch customer batteries two full duty cycles every single day, but does anticipate the possibility of dispatching batteries two full cycles sparsely if there is a need to do so. Other utilities have designed their respective parameters and incentives based on their unique programs. Likewise, the Company's Program parameters are based on its own unique design. The proposed Wattsmart Batteries Program is different from other utility programs in that it incorporates more than just traditional demand response, as discussed in the advice letter, and requires broader dispatch parameters to ensure the assumed benefits are achieved and to maintain cost-effectiveness. The incentive structure was also designed in a way that the Company believes will stimulate participation.

Notwithstanding, the Company acknowledges UCE's concerns and notes that the Wattsmart Batteries Program is new and will evolve over time to meet customers' needs and achieve desired outcomes. While the Company believes the Program as currently designed is a reasonable starting point to ramp things up and gain knowledge, the Company will continually evaluate the Program and discuss issues, challenges, and changes with the Steering Committee, as it does with its other DSM programs.

2. With respect to participating customers with solar, the intent is for the batteries to be charged by excess solar generation. With respect to customers without solar, their batteries will need to be charged from the grid. However, the Company will not be ready to facilitate participation from customers without solar at the outset of the Program. When the Program

is ready and able to allow participation from customers without solar, the Company will address the subject with the DSM Steering Committee prior to implementation.

3. In order for the Program to be cost-effective as currently designed, flexibility is necessary to use the batteries to their full potential, which could result in energy being pushed back to the grid. If customers choose to participate in the Program, customers will be agreeing to allow the Company to use their battery for grid management, and will be compensated through their enrollment incentive and annual incentive for ongoing voluntary participation. As previously noted, the Company will continually evaluate the Program and provide regular updates to the DSM Steering Committee, consistent with the management of other DSM programs. If it is determined that a filing is necessary to incorporate future changes, such as adjustments to Schedule 114, the Company will make another filing for Commission approval.

## CONCLUSION

The Company is appreciative of the extensive stakeholder engagement on the proposed Wattsmart Batteries Program, and if approved, looks forward to working with Steering Committee members on future adjustments.

Based on the recommendations of approval from party comments, and reply comments discussed herein, the Company continues to believe its proposal is prudent and in the public interest, and recommends the Commission approve it as filed, effective October 3, 2020.

Sincerely,



Michael S. Snow  
Manager, Regulatory Affairs

Enclosures

**CERTIFICATE OF SERVICE**

Advice No. 20-08  
Docket No. 20-035-T07

I hereby certify that on September 25, 2020, a true and correct copy of the foregoing was served by electronic mail to the following:

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