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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of PacifiCorp's 2021 Integrated Resource Plan	**Docket No. 21-035-09** **Comments from Southwest Energy Efficiency Project and Utah Clean Energy**

The Southwest Energy Efficiency Project ("SWEEP") and Utah Clean Energy ("UCE") appreciate the opportunity to provide comments on PacifiCorp's ("PacifiCorp" or "Company") 2021 Integrated Resource Plan ("IRP"), filed on September 15, 2021, with supplemental sensitivity studies filed on October 1, 2021. SWEEP and UCE recommend that the Commission open a docket, new proceeding, or similar process to investigate the ongoing issues raised in these comments, or in the alternative, direct PacifiCorp to: (1) develop additional potential cases in the conservation potential assessment in future IRPs; (2) include a substantive comparison of actual program savings to measure in the 2023 conservation potential assessment; and (3) direct PacifiCorp to increase DSM in the IRP if actual DSM savings are higher than targets modeled in the IRP.

I. BENEFITS OF DSM IN RESOURCE PLANNING

Demand side management ("DSM") resources are often the lowest cost resources available to meet system needs.[1] This is highlighted by the use of the utility cost test ("UCT") as the threshold cost-effectiveness test in Utah. The UCT by definition measures the impact of energy efficiency on the utility's cost of service. A benefit cost ratio of greater than 1 in the UCT shows that the average customer's bills will be reduced over the long-term by the continued implementation of DSM programs.[2]

In 2020, the last year with data available, PacifiCorp achieved a benefit-cost ratio of 1.61 for its energy efficiency programs, achieving over one dollar and sixty cents in benefits for the utility and its customers for every dollar invested in DSM programs.[3] Given the high cost-effectiveness of these programs it is likely that DSM resources have the ability to provide significant additional benefits to PacifiCorp's customers.

DSM resources reduce the amount of capacity and energy that a utility must procure on behalf of its customers. Within the 2021 IRP, DSM resources are primarily considered in two categories, Class 1 and Class 2. Both of these Classes of DSM resources are delivered through PacifiCorp customer-funded programs.

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[1] ACEEE, Renewable are getting Cheaper but Energy Efficiency, on average, still costs utilities less, *found at* https://www.aceee.org/blog/2018/12/renewables-are-getting-cheaper-energy.
[2] Understanding Cost-Effectiveness of Energy Efficiency Programs: Best Practices, Technical Methods, and Emerging Issues for Policy-Makers, November 2008, page 6-3, *found at*: https://www.epa.gov/sites/production/files/2015-08/documents/cost-effectiveness.pdf.
[3] Docket No. 20-035-33, 2020 Utah Energy Efficiency and Peak Reduction Annual Report, page 20, *found at: https://pscdocs.utah.gov/electric/21docs/2103533/318902RdctdRMPDSM2020AnlEnrgEfcncyPkLdRdctnRprt5-28-2021.pdf*.

II. OVERVIEW OF THE CLASS 2 DSM AND CLASS 1 DR SELECTIONS IN THE 2021 IRP

a. Class 2 DSM in the 2021 IRP

The overall amount of Class 2 DSM selected over the 20-year planning horizon in the 2021 IRP's Preferred Portfolio is positive relative to recent IRPs. The 2021 IRP DSM selections are higher than the DSM selections from the Preferred Portfolios in the 2017 IRP, 2017 IRP Update, and the 2019 IRP. The 2021 IRP DSM selections increase each year until 2030 (peaking at 342,228 MWh) and then decline. DSM selections in later years are less definitive and less well known since codes and standards, market adoption of technologies, and energy prices are less predictable further into the future. Therefore, early years are more relevant.

While the overall amount of DSM selected has increased from recent years, when comparing the Class 2 DSM selections in the 2021 IRP with the amount of DSM achieved by PacifiCorp in recent years, we believe that the Class 2 DSM selections in the 2021 IRP are low in the near term.

The average amount of DSM per year selected in the first five years of the 2021 IRP is significantly less than the previous five years of actual DSM savings achieved in Utah. The average actual MWh savings from the previous five years is 326,177 MWh/year (2016-2020).[4] During this time, DSM has continued to be a very cost-effective energy resource, with an average benefit/cost ratio of 2.07 using the utility cost test.[5] In contrast, the average MWh savings for the first five years of Class 2 DSM selected in the 2021 IRP is only 264,833

[4] Rocky Mountain Power's Utah Energy Efficiency and Peak Reduction Annual Reports from 2016-2020 are available at https://www.pacificorp.com/environment/demand-side-management.html.
[5] *Id.*

MWh/year (2021-2025). This is 23% lower than the actual DSM achieved in the previous 5 years.

At this point there is a clear pattern with PacifiCorp's IRP selecting much less DSM in the preferred portfolio than the actual Utah DSM programs achieve each year. The table below shows how the 2019 IRP underestimated the amount of DSM achieved in 2020, 2021, and 2022. It appears that the 2021 IRP is following the same pattern of underestimating the amount of DSM that is cost-effectively achievable in Utah.

Comparison of Class 2 DSM (MWh/year)			
	2020	**2021**	**2022**
2019 IRP (Utah)[6]	254,270	254,120	254,590
2021 IRP (Utah)[7]	N/A	230,790	257,465
Nov. Forecast for 2022 (Nov 2021)[8]	N/A	N/A	349,894
Total Class 2 DSM achieved in Utah	356,724[9]	309,417[10]	N/A
Total Class 2 DSM achieved in Utah (with incremental savings from Home Energy Reports only)	284,812[11]	N/A	

[6] PacifiCorp's 2019 IRP, Volume II, Appendices A-L, page 72, Table D.4, *found at:* https://www.pacificorp.com/energy/integrated-resource-plan html.
[7] PacifiCorp's 2021 IRP Volume II Appendices, page 110Table D.4, *found at*: https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2021-irp/Volume%20II%20-%209.15.2021%20Final.pdf.
[8] Docket No. 21-035-45, Rocky Mountain Power's Annual Demand Side Management Deferred Account and Forecast Report, filed on November 1, 2021, page 4, *found at:* https://pscdocs.utah.gov/electric/21docs/2103545/320960RMPDSMDfrdAcntFrcstRprt11-1-2021.pdf.
[9] Docket No. 20-035-33, Rocky Mountain Power's 2020 Utah Energy Efficiency and Peak Reduction Annual Report filed on May 28, 2021, page 3, *found at:* https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/environment/dsm/utah/Energy_Efficiency_and_Peak_Reduction_Report_2020.pdf.
[10] Rocky Mountain Power Q4 2021 UT DSM Accounting Report, shared with Rocky Mountain Power DSM Steering Committee members on February 3, 2022. This figure is an estimate as of February 3, 2022.
[11] *Supra*, note 9.

Actual savings in 2020 are 356,724 MWh (with a cost/benefit ratio of 1.61) and technically achievable savings for the first five years in Utah are 375,745 MWh/year.[12] It is very concerning that the IRP is selecting average DSM savings in the first five years of the IRP planning horizon that are substantially lower than either actual or technically achievable savings, which implies that the technically achievable potential is unreasonably low, as discussed in the next section.

b. Behavioral DSM in CPA & 2021 IRP

UCE and SWEEP see behavioral energy efficiency, such as Home Energy Reports ("HER"), as an essential part of a robust DSM portfolio. However, it is unclear how behavioral energy efficiency, specifically the Home Energy Reports program, is contributing to additional energy savings in the CPA and 2021 IRP. The CPA, states "Impacts of PacifiCorp's existing Home Energy Reports program are captured in the baseline projection, however, the CPA considers the potential to expand this program to additional customers."[13] The cumulative technical achievable potential from Home Energy Reports is estimated to be over 70,000 MWh in 2040.[14]

However, our understanding is that this additional savings potential is not available in Utah since the HER program was expanded to all customers with email addresses in 2020, a

[12] PacifiCorp's 2021 IRP Conservation Potential Assessment, Appendix G, "Savings by Sector&State" tab and "UT" rows in the "Incremental Savings by State and Sector" table, *found at:* https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2021-irp/2021-irp-support-and-studies/cpa-final-report-and-appendices/Appendix%20G%20-%20Energy%20Efficiency%20Detailed%20Results.xlsx.
[13] PacifiCorp's 2021 IRP, Conservation Potential Assessment, Volume I, page 9.
[14] PacifiCorp's 2021 IRP Conservation Potential Assessment, Appendix G, See the "UT" state "Home Energy Report" measure row in the "Measure Database" tab.

development which does not appear to have been considered by the Company when developing the CPA analysis. The Company's response to UCE Data Request 3.2 reiterates that the effect of the Home Energy Reports program is captured in the baseline projections by reducing customer sales. Given these facts, we believe that the 2021 CPA and the 2021 IRP do not accurately reflect the actual role of HER programs in Utah. As a result, we believe that the Company should continue to work with stakeholders in the Steering Committee to clarify its reporting of behavioral energy savings and investigate opportunities to ramp up the amount of other Class 2 residential DSM programs implemented and clarify how the effect of HER programs is considered in customer baseline data with DSM stakeholders.

c. Class 1 DR in the 2021 IRP

The amount of demand response (DR) selected in the 2021 IRP is positive and shows that DR will play a larger role in utility system planning in the near term and over the 20-year planning period. The Company's DR selections in the 2021 IRP are broken out by season (winter and summer) as well as a third "RFP" category. When combining all three categories, the selections show an increase in total DR capacity in 2022, a notable spike in 2023, and then a return to close to 2022 levels for several years. UCE and SWEEP support the amount of increased DR in the 2021 IRP, and we urge the Company and Commission to consider this level of DR a "floor" that should be exceeded as cost-effective demand response events are identified to maintain system reliability, frequency modulation, and other services.

We also believe that the Company should clarify for stakeholders how the three categories of DR are quantified in a way that avoids double counting DR resources that provide capacity savings during different parts of the year, i.e., summer and winter. This will help

stakeholders understand how to monitor and provide meaningful feedback on DR action planning and implementation in the future.

III. DEFICIENCIES WITH THE CONSERVATION POTENTIAL STUDY

a. Class 2 DSM

The Conservation Potential Assessment ("CPA") completed by PacifiCorp as part of the 2021 IRP process estimates extremely low potential for Class 2 DSM resources over the next twenty years. For the five states included in the study, the CPA estimates that the total technical potential is 28.1% of baseline load cumulatively over the next twenty years.[15] This equates to a total potential of approximately 1.4% of sales per year, without taking into account the cost or cost-effectiveness of the DSM measures analyzed. The CPA also estimates a Technically Achievable Potential, which constrains the total technical potential based on market adoption rates but also does not consider cost-effectiveness, of 20.1% of baseline sales cumulatively over the next twenty years.[16] This equates to an average of approximately 1% achievable savings each year.[17]

However, the total 20 year potential does not tell the whole story. For example, for Utah in 2022-2024, the years in which Class 2 DSM is covered by the Action Plan, the total incremental Technically Achievable Potential is 337,984 MWh in 2022, 358,937 MWh in 2023, and 380,293 MWh in 2024.[18] Using PacifiCorp's Utah load forecast this equates to total achievable energy savings as a percentage of load of 1.23% in 2022, 1.27% in 2023, and 1.3% in

[15] PacifiCorp's 2021 IRP, Conservation Potential Assessment, Volume I, page 31.
[16] *Id*.
[17] *Id*. at 32, table 4-2.
[18] *Id*. at 32, table 4-3.

2024. Leading jurisdictions continue to cost-effectively achieve annual DSM energy savings in excess of 2.5% of sales, significantly higher than the total Technically Achievable Potential identified by PacifiCorp. Leading utilities in the Southwest have been achieving energy savings in excess of 1.75% of sales over the past few years with similar service territories as PacifiCorp's. There is nothing specific to PacifiCorp's service territory that leads SWEEP and UCE to believe that this level of sustained energy savings could not be achieved over the long term in Utah. Thus, it is not plausible that the Technically Achievable Potential (e.g., the maximum DSM that can be achieved regardless of cost) over the next few years would be limited to 1.3% or less of baseline sales per year.

As the Achievable Technical Potential is the total amount of Class 2 DSM available to the model to select, one would expect limited selection of DSM given the limited amount available. SWEEP and UCE raised similar concerns with the 2019 CPA and modeling process. In response to these concerns, PacifiCorp stated that it would work with stakeholders to evaluate potential improvements to the CPA methodology and IRP modeling process.

SWEEP and UCE attempted to work with PacifiCorp, asking the Company to 1) develop a low, medium, and high case in the CPA to assess the robustness of the modeling to increased amount of Class 2 DSM, and 2) conduct a comparison of the 2015, 2017, and 2019 CPA results with historical measure-level cost and program achievements, among other requests.[19] In response to these requests PacifiCorp stated that it would consider the first request and conduct a

[19] SWEEP and UCE stakeholder Feedback Form from January 3, 2020, *found at*: https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2021-irp/2021-irp-comments/2020-01-03_PacifiCorp_2021_IRP_Feedback_SWEEP_%20UCE_CPA_SOW_01_03_2020.pdf.

subset of the analysis requested in the second request. SWEEP and UCE continued to bring up both of these analyses with PacifiCorp in the IRP Stakeholder process and met with the Company to discuss the analyses in more detail on October 2, 2020. However, PacifiCorp didn't conduct either analysis in the end. It did not provide any reasoning for not including the first request. For the second request, the Company provided a high-level analysis of savings for "Major Measures" in 2017 and 2018, against its estimated savings for 2021, as an analysis to adjust ramp rates from the previous CPA, which is not what we asked for. The Company did not look at historical cost to acquire the DSM resources compared with its estimated cost, nor did it adjust the 2021 CPA Potential when previous years savings exceeded the total Achievable Technical Potential for a Major Measure category. Thus, we don't believe that the Company has sufficiently addressed our previous concerns from the 2019 IRP process, which remain today in the 2021 IRP.

IV. DEFICIENCIES IN IRP DSM MODELING

The IRP modeling process selects bundles of DSM resources based on the Technical Achievable Potential of Class 2 DSM resources identified in the CPA for each year. Given the deficiencies in the CPA discussed above, there is significantly less Class 2 DSM resources available to the model than one could expect would be available in real life, and thus, the IRP is likely selecting much less DSM resources than are cost-effectively available to PacifiCorp. This raises the cost and risk of the preferred portfolio by having PacifiCorp procure or build unnecessary resources to serve load that could be served through DSM, and by increasing the exposure of PacifiCorp's customers to fuel price and resource cost risks now and in the future.

For the 2021 IRP PacifiCorp modified the methodology it used to bundle Class 2 DSM Resources. In the past, bundles were based on the levelized cost of the DSM resource ($/MWh).

However, in 2021 the Company moved to bundling based on the net cost of capacity ($/kw-yr) of the measures in the CPA. The new bundling methodology was used in all the modeling, with a sensitivity using the same assumptions as the preferred portfolio but using the previous bundling methodology.

a. IRP Preferred Portfolio

In the preferred portfolio, the IRP model generally selects **CONFIDENTIAL INFORMATION BEGINS** [redacted] **CONFIDENTIAL INFORMATION ENDS** of the Class 2 DSM available to it in Utah for all bundles up to **CONFIDENTIAL INFORMATION BEGINS** [redacted] **CONFIDENTIAL INFORMATION ENDS** for all years of the IRP.[20]

The fact that the model generally selects **CONFIDENTIAL INFORMATION BEGINS** [redacted] **CONFIDENTIAL INFORMATION ENDS** of the Class 2 DSM available up to a certain net capacity cost suggests that it would select significant additional Class 2 DSM resources if they were available to the model within one of the cost bundles selected. For years 2022-2024, the preferred portfolio selects between **CONFIDENTIAL INFORMATION BEGINS** [redacted] and [redacted] **CONFIDENTIAL INFORMATION ENDS** of incremental Class 2 DSM resources in each year.

PacifiCorp does not publish its levelized net capacity cost for Class 2 DSM, so the new bundling methodology makes it difficult to compare selections from the IRP with historical achievements.

[20] Calculated by comparing the DSM bundles selected according to the Generator Pivot tab of file ST Cost Summary – P02 – MMGR – CETA ST Split Run Cost Data LT 18609 ST 19709 CONF to the DSM available in the file IRP 2021 EE Potential – NCC Bundles.

b. Levelized Cost of Energy Bundling Sensitivity

Sensitivity S06 is the same as the Preferred Portfolio, except that it uses the previous levelized cost of energy bundling methodology. In this sensitivity, the model selects **CONFIDENTIAL INFORMATION BEGINS** [redacted] **CONFIDENTIAL INFORMATION ENDS**. In this sensitivity, the model selects all bundles with a levelized cost below **CONFIDENTIAL INFORMATION BEGINS** [redacted] **CONFIDENTIAL INFORMATION ENDS** for all years of the IRP.[21] The model then adds more expensive bundles, up to **CONFIDENTIAL INFORMATION BEGINS** [redacted] **CONFIDENTIAL INFORMATION ENDS** in 2030 and beyond.

In 2020, PacifiCorp delivered Class 2 DSM at an average levelized cost of $0.0295/kWh or $29.5/MWh.[22] The average levelized cost in 2018 and 2019 to achieve DSM savings was similar.[23] This average levelized cost to deliver real DSM savings **CONFIDENTIAL INFORMATION BEGINS** [redacted] **CONFIDENTIAL INFORMATION END**. In fact, this sensitivity sees significant value from DSM, selecting resources with a marginal cost of

[21] Calculated by comparing the DSM bundles selected according to the Generator Pivot tab of file ST Cost Summary – S06 – MMGR – LCOE EE ST Split Run Cost Data LT 36429 ST 36472CONF to the DSM available in in file IRP 2021 EE Potential – LCOE Bundles.
[22] 2020 Energy Efficiency and Peak Reduction Report, PY2020 Utah Cost Effectiveness Results – Portfolio, Table 5.
[23] 2019 Energy Efficiency and Peak Reduction Report, PY2018 Utah Cost Effectiveness Results – Portfolio, Table 5.

CONFIDENTIAL INFORMATION BEGINS [redacted] **CONFIDENTIAL INFORMATION END** that average cost of the 2020 actual DSM portfolio. The model uses these resources to **CONFIDENTIAL INFORMATION BEGINS** [redacted] **CONFIDENTIAL INFORMATION END** over the long-term.

This disconnect highlights one of the problems with developing DSM targets based solely on modeling in the IRP. The IRP selects a quantity of Class 2 DSM resources, but it does that by choosing resources based on cost. If additional DSM is available to PacifiCorp below this price it would be reasonable to assume that it would also be in customer's best interest to pursue these resources to avoid future investments.

To test this assumption, SWEEP and UCE submitted Stakeholder Input Form requests, asking PacifiCorp to run various scenario and sensitivity options to see if the availability of additional DSM would reduce the cost and risk of selected portfolios. PacifiCorp declined. In addition, we have asked PacifiCorp to compare the cost of resources in its CPA with its actual achievement. This would provide helpful information to the Commission and Company to "ground-truth" its CPA against actual achievements and provide one measure of the reasonableness of the assumptions within the CPA.

UCE submitted a data request in this docket asking PacifiCorp how it compared its 2021 CPA costs to actual measure costs, and we are still concerned that the way the Company performed this comparison is synthetically conservative in the 2021 IRP, and was inconsistent with our original request. PacifiCorp's response to UCE Data Request 3.1 is unclear and suggests that 'actual' savings numbers compared to the CPA costs were in fact lower than actual historical DSM savings from the annual DSM report. In response to our data request, PacifiCorp shared a

worksheet that included two tabs that showed electricity savings for 2017 and 2018 broken out by state and measure category. However, the total MWh savings for each year in the worksheet is less than the amount of electricity savings reported by the Company in its 2017 and 2018 DSM annual reports. For example, the amount of Class 2 DSM reported by the Company in 2017 is 372,945 MWh[24], whereas the data request response attachment shows 261,148 MWh (or 316,422 MWh including HER) for 2017. And the amount of Class 2 DSM savings reported by the Company in 2018 is 284,684 MWh[25], whereas the amount of DSM in PacifiCorp's response to UCE data request 3.1 shows 192,330 MWh (or 231,612 MWh including HER).

Without truing up the costs of actual DSM measures to the measures in the CPA, SWEEP and UCE believe that the preferred portfolio selected in the 2021 IRP is not the least-cost and least risk portfolio, nor is this a consistent and comparable comparison of DSM and DR resources to alternative resources. Recent program performance would lead us to believe that significantly more DSM resources would be available up to the marginal cost of the most expensive DSM bundle selected and it would be useful to see if there is a limit to the amount of DSM selected within these cost bundles, or if the model would select all DSM available up to a reasonable maximum (e.g., up to 1.5-2% of sales per year).

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[24] Docket No. 18-035-19, Rocky Mountain Power's 2017 Energy Efficiency and Peak Reduction Report, page 8, Table 3, *found at*: https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/environment/dsm/utah/Energy_Efficiency_and_Peak_Reduction_Report_2017.pdf.

[25] Docket No. 19-035-22, Rocky Mountain Power's 2018 Energy Efficiency and Peak Reduction Report, page 5, *found at*: https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/environment/dsm/utah/Energy%20Efficiency%20and%20Peak%20Reduction%20Report%202018%20(Utah).pdf.

If it were cost-effective within the IRP to select all DSM up to a certain cost, then it would be prudent for PacifiCorp to pursue all cost-effective DSM up to the average levelized cost of the most expensive cost-bundle selected by the IRP in order to minimize the costs of serving its customers.

V. RECOMMENDATIONS

During the last IRP process, we raised these concerns and the Commission ordered us to work with PacifiCorp through the stakeholder process. SWEEP and UCE tried to do this, through multiple stakeholder feedback forms and conversations with PacifiCorp representatives directly, but the utility ultimately refused to provide the analysis we requested. As this point, we believe that a unique docket, compliance filing in this docket, or other process is necessary for PacifiCorp to address these issues specifically. We request that the Commission create a new forum to formally reevaluate the IRPs DSM selection process in Utah.

Alternatively, we reiterate some of our suggestions from the previous IRP and ask the Commission to direct PacifiCorp to make these changes in the 2023 IRP:

1. Develop Low, Medium, and High Cases for Technically Achievable Potential in the CPA by working with stakeholders to adjust assumptions around cost and availability of DSM resources. Multiple DSM supply curves will allow PacifiCorp and stakeholders to test the sensitivity of the IRP modeling process to assumptions about the availability and cost of Class 1 DSM resources.
2. Include an analysis as part of the 2023 CPA comparing measure-level levelized cost and supply assumptions from the 2021, 2019, 2017, and 2015 CPAs with historical measure-level cost and program achievements in Utah. Given that PacifiCorp develops a CPA every two years, SWEEP and UCE believe it would be prudent to compare CPA estimates with actual DSM program performance to identify any potential errors or systematic bias in the CPA. Such an analysis would allow PacifiCorp to ground-truth its CPA supply curves with real program data and will likely provide valuable information to PacifiCorp and the Commission.
3. Direct the Company to increase DSM targets and spending if program performance differs from targets modeled in the IRP.

DATED March 4, 2022.

Respectfully submitted,

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CERTIFICATE OF SERVICE
Docket No. 21-035-09

I hereby certify that a true and correct redacted copy of the foregoing was served by email this 4th day of March 2022, on the following. A confidential copy of these will be distributed separately.

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