

To: Jana Saba

From: Clare Valentine & Sophie Hayes, Western Resource Advocates

Date: May 12, 2022

Re: Grid Mod Roadmap – WRA’s initial feedback and questions

Key Points of Feedback

1. **DERMS**—WRA generally supports the implementation of a DERMS, but would like to know more about the capabilities that the Company is seeking with a DERMS and how the Company plans to maximize value from the DERMS. WRA is concerned that the Company may invest, in the near term, in a relatively limited DERMS that forecloses the opportunity to make a more comprehensive, and higher value, investment within the next ~10 years.
2. **IVVO**—WRA would like to see more near-term efforts to investigate IVVO because it can reduce unnecessary energy use and peak demand on the system.
3. **Energy Usage Tools**—WRA appreciates the work that the Company has done to plan new energy usage tools, particularly Green Button “Download My Data.” WRA also recommends that the Company implement Green Button “Connect My Data” to allow customers to share their energy data with vendors of their choosing.

Key Questions about RMP GridMod Roadmap

1. Regarding the deployment of a distributed energy resource management system (“DERMS”):
 - a. Has the Company already selected a DERMS vendor or product? If so, what vendor or product has the Company selected? Please provide details about how this product is similar to or different from other available products.
 - b. What are the core features that the Company prioritizes in a DERMS? If the Company doesn’t yet have a list of core features, when will it determine these capabilities?
 - c. How is the Company ensuring that its DERMS is “future-proof”? Does the DERMS have compatibility with emerging standards and communication protocols?
 - d. Does the Company plan to use the DERMS for functions beyond controlling energy storage (e.g., for advanced demand response purposes, smart inverter control, etc.)? How?
2. The Roadmap shows that the potential timeframe for IVVO is ten or more years.
 - a. Why does the Company not intend to pursue IVVO earlier, in a shorter timeframe? Is this due to technical limitations, and if so can the Company describe those limitations?
 - b. How is the Company evaluating the customer and grid value of IVVO? Does the Company believe that IVVO does not have sufficient net benefits to pursue in the near-term?
3. As part of its efforts to provide energy usage tools to customers, will the Company implement Green Button “Connect My Data”? If yes, what is the timeline for this project? If no, why not?
4. Regarding the deployment of an ADMS:
 - a. How is the Company using the phrase “business requirements” in this section? Does that refer to the key features the Company seeks in an ADMS?
 - b. How is the Company determining business requirements for the ADMS? Will the Company be able to provide updates on the business requirements to stakeholders?

- c. Why is the Company implementing a DERMS prior to an ADMS? Does implementing a DERMS prior to an ADMS limit or complicate the implementation of an ADMS?
 - d. If a DERMS will be implemented prior to an ADMS, why will the ADMS include the feature: “smaller scale distributed energy resource (DER) management.” Won’t the DERMS already offer this capability?
 - e. Please explain the sequencing of the Company’s DERMS and ADMS investments.
 - f. Why is the Company investing in DERMS before ADMS?
- 5. The Roadmap states that the CFAN will provide “wildfire mitigation and grid resiliency options for specific, typically remote, areas...” Regarding the CFAN:
 - a. Please explain how the Company will use this technology for wildfire mitigation and resiliency. Is it correct that the Company will be able to use the CFAN to communicate with devices (“IEDs”) to remotely de-energize lines when there is wildfire risk?
 - b. Are there other protection and control actions that the Company will be able to execute? How will these work, and are they automated?
 - c. The Roadmap states: “Rocky Mountain Power has several projects across the state of Utah to retrofit CFAN to existing IEDs.” What does retrofitting CFANs to existing IEDs entail?
 - d. The Roadmap states: “Currently Rocky Mountain Power has installed CFAN on approximately 20 IEDs, five of which were funded by the STEP ARMS project. Rocky Mountain Power has another 30 CFAN+ routers ready for field installation, out of which 10 installations are expected to be completed by end of 2022.” Approximately what percentage of remote IEDs do these figures represent? Does the Company have an estimate of what percentage of remote lines will be covered by these devices? Is the Company prioritizing certain remote areas over others for these devices?