



June 28, 2021

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84111

Re: Docket 21-035-33 – Rocky Mountain Power’s Demand-Side Management (DSM) 2020 Annual Energy Efficiency and Peak Load Reduction Report

Utah Clean Energy (UCE) and the Southwest Energy Efficiency Project (SWEEP) appreciate the opportunity to submit these comments in response to Rocky Mountain Power’s 2020 Annual Energy Efficiency and Peak Load Reduction Report (Annual Report). UCE and SWEEP believe that Rocky Mountain Power’s Annual Report meets the PSC requirements. In addition, Rocky Mountain Power’s DSM programs continue to provide valuable economic and environmental benefits to Utah ratepayers.

Increases in DSM Acquisition in 2020

According to its 2020 DSM report, Rocky Mountain Power’s 2020 demand side management programs achieved a total of **356,724 MWh** in electricity savings in 2020.¹ This is a 24% increase above its 2019 electricity savings (272,387 MWh)². In 2020, Rocky Mountain Power exceeded the level of DSM forecasted in its November forecast for 2020 (301,246 MWh) and it also exceeded its 2019 IRP target for 2020 (254,270 MWh).³ Even more notable, Rocky Mountain Power was able to significantly exceed the savings in its DSM forecast while spending less than its forecasted budget.

The Annual Report shows that Rocky Mountain Power’s 2020 load control activities increased by 14% over 2019, achieving 234 MW in 2020 as compared to 202 MW in 2019. RMP also exceeded the Class 1 DSM target for 2020 identified in the 2019 IRP by 41%, which called for only 139 MW.⁴

¹ Docket No. 21-035-33, Rocky Mountain Power’s 2020 Annual Efficiency Report, page 3, *found at*: <https://pscdocs.utah.gov/electric/21docs/2103533/318902RdctdRMPDSM2020AnlEnrgEfcncyPkLdRdctnRprt5-28-2021.pdf>.

² Docket No. 20-035-27, Rocky Mountain Power’s 2019 Annual Efficiency Report, page 5, *found at*: https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/environment/dsm/utah/Energy_Efficiency_and_Peak_Reduction_Report_2019.pdf.

³ Docket No. 21-035-33, Rocky Mountain Power’s 2020 Annual Efficiency Report, page 14, *found at*: <https://pscdocs.utah.gov/electric/21docs/2103533/318902RdctdRMPDSM2020AnlEnrgEfcncyPkLdRdctnRprt5-28-2021.pdf>.

⁴ Id.



Utah Clean Energy and SWEEP congratulate RMP for a successful program year. This is especially impressive given that these savings were achieved in the midst of the Covid-19 pandemic.

DSM is a Cost-Effective and Highly Affordable Energy Resource

In 2020, both Class 1 and Class 2 DSM continued to be highly cost-effective and affordable energy resources. The benefit/cost ratio of Rocky Mountain Power's 2020 Class 2 DSM programs was 1.61 using the Utility Cost Test (UCT) with a levelized cost of \$0.0295 per kWh saved. When both Class 1 and Class 2 resources are considered, the cost-effectiveness is 2.19 UCT, with a levelized cost of \$0.0660 per kWh. Rocky Mountain Power's 2020 programs generated significant economic benefits to its ratepayers totaling \$154 million over the 12- to 14-year average life of the measures installed.

Program Specific Comments

In 2020, Rocky Mountain Power continued to expand innovative programs and support innovative DSM measures. It tripled the amount of savings from water heating and doubled the energy savings in the multifamily whole building program. UCE and SWEEP see this growth as an important development during a challenging year. In addition, Rocky Mountain Power successfully launched a dual fuel heat pump and furnace program with Dominion Energy, the first program in the nation we are aware of being run collaboratively between two unaffiliated investor-owned utilities.

UCE and SWEEP recognize that the Home Energy Report (HER) program is a positive part of a comprehensive residential DSM program. Our understanding is that in 2020, Rocky Mountain Power increased outreach of the HER program to "any customer with an email address on file" to adapt to the challenges presented by the Covid-19 global pandemic.⁵ This is an understandable approach that appears to have been successful. In 2020, HER made up nearly 50% of Rocky Mountain Power's ⁵the majority of electricity savings achieved through Rocky Mountain Power's DSM programs. We urge Rocky Mountain Power to target achieving the vast majority (60%+) of its residential DSM savings from traditional Class 2 and Class 1 programs and resources. UCE and SWEEP recommended that the DSM Steering Committee discuss the percentage of overall savings from the HER program as outlined here and in our comments on the 2020 forecast report.⁶ The Steering Committee has not yet discussed this issue. We continue to believe that a conversation with the Steering Committee would help us, and other ⁶committee members, better understand why the HER program is increasingly relied on to provide Class 2 savings, and what strategies could be useful to expand deployment of more traditional Class 2 measures.

⁵ Docket 20-035-31, Rocky Mountain Power's Reply Comments filed on December 17, 2020, page 2, *found at*: <https://pscdocs.utah.gov/electric/20docs/2003531/316763RMPRplCmnts12-17-2020.pdf>.

⁶ Id., UCE and SWEEP Comments filed on December 2, 2020, page 4, *found at*: <https://pscdocs.utah.gov/electric/20docs/2003531/316641SWEEP&UCECmnts12-2-2020.pdf>.



Thank you for the opportunity to provide these comments.

Sincerely,

/s/ Kevin Emerson
Kevin Emerson
Utah Clean Energy

/s/ Justin Brant
Justin Brant
SWEEP

CC: Michael Snow, Rocky Mountain Power
Artie Powell, Division of Public Utilities
Michele Beck, Office of Consumer Services