

November 1, 2021

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

Re: In the Matter of Rocky Mountain Power's Annual Demand Side Management
November 1st Deferred Account and Forecast Reporting
Docket No. 21-035-45

In its order dated August 25, 2009 in Docket No. 09-035-T08 ("Order"), the Public Service Commission of Utah ("Commission") approved the Phase I Stipulation filed August 3, 2009 in the same ("Stipulation"). As specified in the Stipulation, Rocky Mountain Power ("Company") is required to provide to the Commission and Demand Side Management ("DSM") Advisory Group¹ ("Steering Committee") by November 1st of each year a forecast of expenditures for approved programs for the next calendar year and their acquisition targets (in MWh and MW) for the next calendar year. In addition, the order issued December 21, 2011 in Docket No. 10-035-57 directed the Company to provide an estimate of the capacity and energy savings targets for approved programs in the forecast in comparison to demand-side management program targets included in the Company's most recent Integrated Resource Plan. A report containing the forecast of these items for calendar year 2022 is provided in Exhibit A, attached hereto ("Forecast Report").

The Accounting Analysis section of the Forecast Report reflects actual results through September 2021 and projects expenditures and revenues through December 2030. As illustrated in the Accounting Analysis, the Schedule 193 surcharge rate is estimated to remain flat through 2024 under current assumptions. Consequently, the Company does not intend to propose a rate adjustment to Schedule 193 at this time.

Expenditure information for individual DSM programs is provided in the DSM Expenditure section of the Forecast Report. DSM Expenditures include actual results through September 2021 and projects expenditures through December 31, 2022. Historically, the DSM Expenditure section of the Forecast Report has only included programs approved by the Commission. For transparency however, a budget line item was added for a new Custom Commercial and Industrial Demand Response program ("C&I DR Program") that has not yet been approved by the Commission. The Company intends to file an Advice Letter with the Commission by the end of 2021 proposing and requesting approval of a new C&I DR Program. The DSM Steering Committee was made aware of the C&I DR Program intent during the last two meetings held September 16, 2021 and October 27, 2021. A draft Advice Letter will be circulated and discussed with DSM Steering

¹ In context of this filing, DSM Advisory Group is redefined as the DSM Steering Committee.

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Committee members prior to filing with the Commission. The C&I DR Program's budget will be removed from the Company's forecast if it does not get approved by the Commission.

Also included in the Forecast Report, and in compliance with the Commission's February 10, 2012 Acknowledgement Letter in Docket No. 10-035-57, is an estimate of total program participation and contribution to peak system load for the Irrigation Load Control Program. This analysis is included in the Peak Impact section of the Forecast Report.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com
michael.snow@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Blvd., Suite 2000
Portland, OR 97232

Informal inquiries may be directed to me at (801) 220-4214.

Sincerely,



Michael S. Snow
Manager, Regulatory Affairs

cc: Division of Public Utilities
Office of Consumer Services

Enclosures

Exhibit A

2022 Savings Forecast and Integrated Resource Plan Targets

	2022 Program Forecast		2021 Integrated Resource Plan	
	MWH @ Gen	MW	MWH	MW
	2022	2022	2022	2022
Class 1 DSM - Residential, Commercial, Industrial				
Air Conditioner Load Control - Res. & Small Com. (Sch. 114)		248		124
Irrigation Load Control - Industrial (Sch. N/A)		20		20
Wattsmart Batteries Program		15		2.2
C&I Load Control Program (pending program)		20		52.5
Total Class 1		303		199
Class 2 DSM - Residential				
Low Income (Sch. 118)	178	0	N/A	N/A
Home Energy Reporting (Sch. N/A)	95,257	14	N/A	N/A
wattsmart Homes (Sch. 111)	59,555	9	N/A	N/A
Total Class 2 Residential	154,990	23	N/A	N/A
Class 2 Non-Residential Programs				
wattsmart business (Sch. 140)	194,904	29	N/A	N/A
Total Class 2 Non-Residential	194,904	29	N/A	N/A
Total Class 2	349,894	52.74	257,465	38.81
Total Class 2 Estimated Range	304,216 - 336,239			
Total Class 2 (with HER Incremental Savings)	241,905 - 267,369			38.38

Notes:

1. Class 1 DSM A/C Load Control: 2021 IRP Vol. 1 Table 6.10 pg. 147 lists 124 MW of existing capacity for air conditioner load.
2. Class 1 DSM Irrigation Load Control: 2021 IRP Vol. 1 Table 6.10 pg. 147 lists 205 MW of existing capacity for irrigation load, 20 MW of which is in Utah.
3. Class 1 DSM Batteries and C&I: 2021 IRP Vol. 2 Appendix D Table D.3 pg. 109 lists 54.7 MW of incremental capacity for Utah, allocated to batteries and C&I.
4. Class 2 DSM resource plan results are not selected at a program level (no program level IRP targets available).
5. Irrigation forecast represents highest expected realized value during the season (see "Irrigation Load Peak Impact" tab for an estimate by week throughout season).
6. Air conditioner load control (Cool Keeper) forecast represents the expected contribution/impact available at peak, temperature dependent.
7. Total Class 2 DSM: 2021 IRP Vol. II Table D.4 pg. 110 selected 257,465 MWh of energy efficiency for 2022.
8. Forecast of coincident peak MW for **Utah's** Class 2 DSM resource is derived through the following formula:

Forecasted Class 2 DSM energy savings	349,894	MWh
Divided by 2022 Utah energy selections from the 2021 IRP Appendix D	257,465	MWh
Multiplied by Utah 2022 coincident peak value from the 2021 IRP	38.81	MW
Estimated coincident peak impact of 2022 Utah Class 2 DSM programs	52.74	MW
9. 2021 IRP Utah 2021 Energy Efficiency coincident peak contribution derived from data contained in 2021 IRP Vol. 1 Table 9.18 pg. 309. See the DetailPivot workpapers in support of 38.81 calculation.
10. Savings is at generation.

Accounting Analysis

DSM Spend and Collections

Program Spend
Collections
Estimated Surcharge Rate

	2020 Full Year	2021 Full Year	2022 Full Year	2023 Full Year	2024 Full Year	2025 Full Year	2026 Full Year	2027 Full Year	2028 Full Year	2029 Full Year	2030 Full Year	All Years
	Total 2020	Total 2021	Total 2022	Total 2023	Total 2024	Total 2025	Total 2026	Total 2027	Total 2028	Total 2029	Total 2030	
Program Spend	64,090,327	61,338,300	71,500,000	70,000,000	70,000,000	70,000,000	70,000,000	70,000,000	70,000,000	70,000,000	70,000,000	692,838,300
Collections	48,737,866	70,253,934	71,562,183	73,424,463	74,958,563	79,305,449	87,537,893	92,962,937	94,943,368	97,261,560	98,597,739	840,808,090
Estimated Surcharge Rate	3.56%	3.56%	3.56%	3.56%	3.56%	3.73%	4.06%	4.26%	4.28%	4.34%	4.35%	
Regulatory Asset												
Beginning Balance	139,768,454	179,567,371	218,697,102	258,534,586	289,794,988	314,055,390	331,315,792	341,576,194	347,081,101	351,028,478	352,919,482	
Program Spend	64,090,327	61,338,300	71,500,000	70,000,000	70,000,000	70,000,000	70,000,000	70,000,000	70,000,000	70,000,000	70,000,000	692,838,300
Amortization	(18,400,788)	(24,946,181)	(31,662,516)	(38,739,598)	(45,739,598)	(52,739,598)	(59,739,598)	(64,495,093)	(66,052,623)	(68,108,996)	(69,338,810)	(521,562,611)
Carrying Charge (8.99% rate)		16,417,610	17,789,262	19,305,275	24,924,642	26,565,851	27,798,295	28,467,844	28,890,745	29,152,564	29,258,929	248,571,019
Paydown of Carrying Charge		(16,417,610)	(17,789,262)	(19,305,275)	(24,924,642)	(26,565,851)	(27,798,295)	(28,467,844)	(28,890,745)	(29,152,564)	(29,258,929)	(248,571,019)
Ending Balance	184,618,685	215,959,491	258,534,586	289,794,988	314,055,390	331,315,792	341,576,194	347,081,101	351,028,478	352,919,482	353,580,672	
Regulatory Liability												
Beginning Balance	(154,075,179)	-	(28,890,143)	(51,000,549)	(21,380,138)	(25,674,461)	(25,674,461)	(25,674,461)	(25,674,461)	(25,674,461)	(25,674,460)	
Collections	(48,737,866)	(70,253,934)	(71,562,183)	(73,424,463)	(74,958,563)	(79,305,449)	(87,537,893)	(92,962,937)	(94,943,368)	(97,261,560)	(98,597,739)	(840,808,090)
Amortization	18,400,788	24,946,181	31,662,516	38,739,598	45,739,598	52,739,598	59,739,598	64,495,093	66,052,623	68,108,996	69,338,810	521,562,611
Carrying Charge (8.99% rate)		-	-	-	-	-	-	-	-	-	-	
Paydown of Carrying Charge		16,417,610	17,789,262	19,305,275	24,924,642	26,565,851	27,798,295	28,467,844	28,890,745	29,152,564	29,258,929	248,571,019
Coal Accelerated Depreciation Applications	185,158,306	-	-	45,000,000	-	-	-	-	-	-	-	45,000,000
Ending Balance	-	(28,890,143)	(51,000,549)	(21,380,138)	(25,674,461)	(25,674,461)	(25,674,461)	(25,674,461)	(25,674,461)	(25,674,460)	(25,674,460)	
Net Regulatory Asset/(Liability)												
Ending Balance	184,618,685	187,069,347	207,534,037	268,414,850	288,380,929	305,641,331	315,901,733	321,406,640	325,354,017	327,245,022	327,906,212	
Coal Fund Balance												
Balance per October 2018 Filing	192,000,000	229,000,000	258,000,000	282,000,000	300,000,000	310,000,000	316,000,000					
Balance per current assumptions	185,158,306	214,048,449	236,158,855	251,538,444	255,832,767	255,832,767	255,832,767					
Fund Balance Variance: Surplus/(Deficit)	(6,841,694)	(14,951,551)	(21,841,145)	(30,461,556)	(44,167,233)	(54,167,233)	(60,167,233)					

Assumptions/Comments

Future collections are estimated based on projected load growth and base rate increase of 1.6% in 2021
 Collections surcharge rate is held flat at 3.56% until amortization and carrying charges exceed projected collections, at which point surcharge/collections increased to equal amortization plus carrying charges.
 \$185m coal plant buy down applied in 2021; and additional \$45m coal plant buy down anticipated in 2024.
 Includes 2021 actuals through the end of Sept.

DSM Expenditures

	YTD Balance Sep 2020	Accrual for Sep	Total thru Sep 2021	Forecast Oct thru Dec 2021			Total Projected 2021 Charges	2021 Program Year Spend		
				Oct-21	Nov-21	Dec-21		Nov 2, 2020 Forecast	Jul 2021 Forecast	Nov 1, 2021 Forecast
Residential Programs										
A/C Load Control Program (Sch. 114)	\$4,599,136	\$146,484	\$4,745,620	\$139,455	\$127,738	\$127,738	\$5,140,551	\$7,000,000	\$7,000,000	\$5,140,551
Wattsmart Batteries Program	\$256,134	\$ -	\$256,134	\$114,000	\$940,000	\$940,000	\$2,250,134	\$1,100,000	\$1,100,000	\$2,250,134
Low Income (Sch. 118)	\$95,210	\$ -	\$95,210	\$6,250	\$6,250	\$6,250	\$113,960	\$75,000	\$75,000	\$113,960
Home Energy Reports (Sch. N/A)	\$1,313,252	\$ -	\$1,313,252	\$95,000	\$95,000	\$95,000	\$1,598,252	\$1,200,000	\$1,200,000	\$1,598,252
wattsmart Homes Program (Sch. 111)	\$11,727,973	\$846,590	\$12,574,563	\$968,306	\$798,929	\$2,544,840	\$16,886,638	\$15,500,000	\$15,500,000	\$16,886,638
	\$17,991,704	\$993,074	\$18,984,778	\$1,323,011	\$1,967,917	\$3,713,828	\$25,989,534	\$24,875,000	\$24,875,000	\$25,989,534
Commercial & Industrial Sector Programs										
wattsmart Business Commercial (Sch. 140)	\$19,578,139	\$1,107,322	\$20,685,461	\$5,208,888	\$2,481,541	\$3,112,705	\$37,488,417	\$37,000,000	\$37,000,000	\$37,488,417
wattsmart Business Industrial (Sch. 140)	\$5,650,141	\$349,681	\$5,999,822	\$595,000	\$5,000	\$5,000	\$818,159	\$650,000	\$650,000	\$818,159
Industrial Irrigation Load Control (Sch. N/A)	\$5,809	\$207,350	\$213,159	\$595,000	\$5,000	\$5,000	\$818,159	\$650,000	\$650,000	\$818,159
C&I Load Control Program (pending)										
	\$25,234,090	\$1,664,352	\$26,898,442	\$5,803,888	\$2,486,541	\$3,117,705	\$38,306,576	\$37,650,000	\$37,650,000	\$38,306,576
Outreach and Communications	\$1,463,040	\$86	\$1,463,126	\$25,000	\$0	\$0	\$1,488,126	\$1,500,000	\$1,500,000	\$1,488,126
Portfolio (TRL, DSM Central, Training)	\$226,607	\$12,240	\$238,847	\$12,000	\$12,000	\$12,000	\$274,847	\$152,000	\$226,160	\$274,847
Program Evaluation Cost - C&I	\$366,727		\$366,727	\$42,550	\$42,550	\$42,550	\$494,377	\$510,597	\$510,597	\$494,377
Program Evaluation Cost - Res	\$133,257	\$51,521	\$184,777	\$9,257	\$9,257	\$9,257	\$212,547	\$111,080	\$111,080	\$212,547
2021 Potential Study	\$12,866	\$2,769	\$15,635	\$6,458	\$6,458	\$6,458	\$19,375	\$77,500	\$77,500	\$19,375
Total DSM Program Expenditures	\$45,428,291	\$2,724,042	\$48,152,333	\$7,222,164	\$4,524,723	\$6,901,798	\$66,785,382	\$64,876,177	\$64,950,337	\$66,785,382

Notes;
Jan-Sep 2021 actuals
Accruals added to capture full cost through Sep
Split for WSB program cost was based on 2020 kWh
savings (76% / 24%)

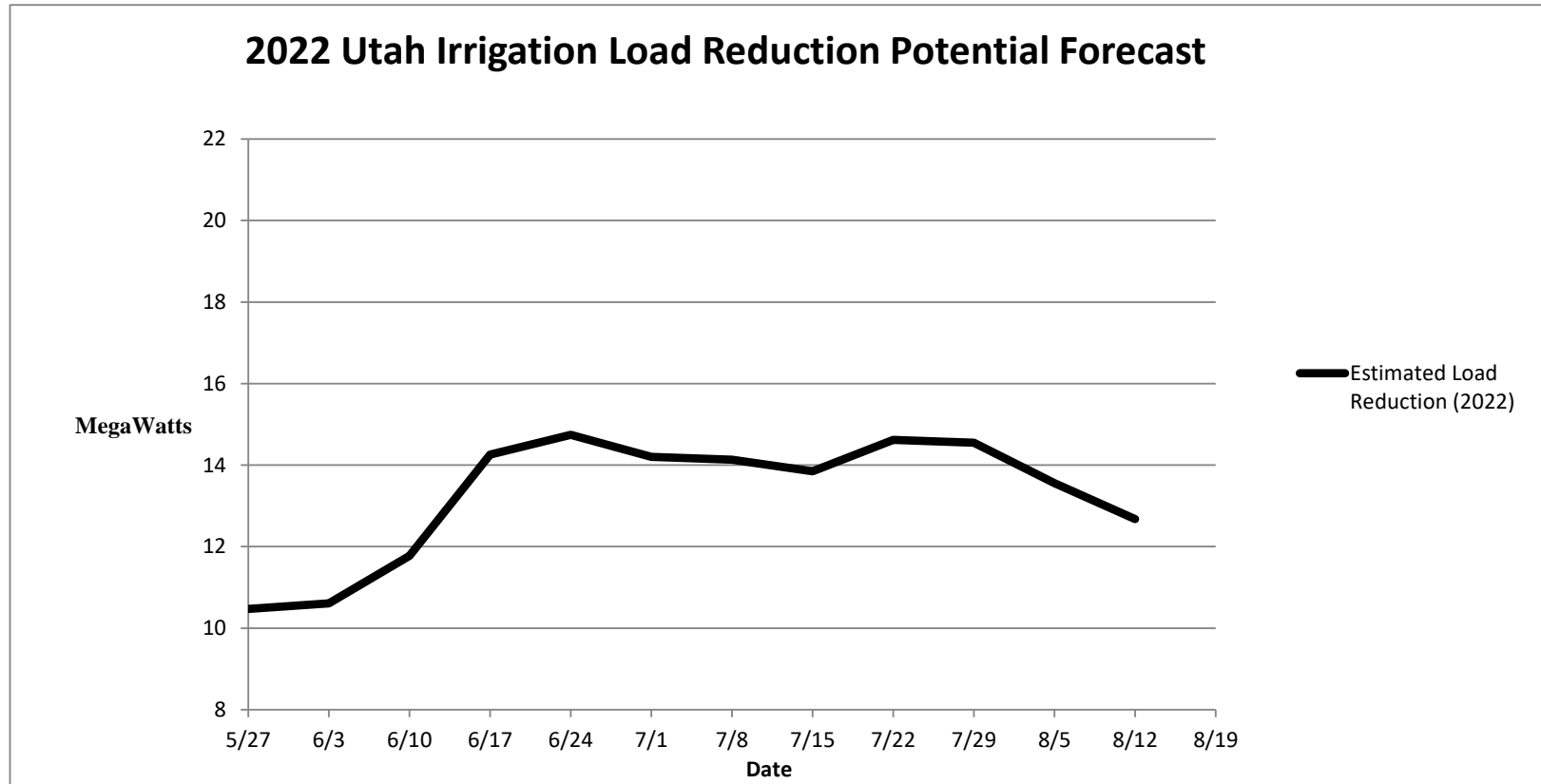
DSM Expenditures

	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan - Dec 2022 Totals	2022 Budget Forecast
Residential Programs														
A/C Load Control Program (Sch. 114)	\$400,000	\$400,000	\$400,000	\$400,000	\$700,000	\$700,000	\$700,000	\$750,000	\$750,000	\$400,000	\$500,000	\$400,000	6,500,000	6,500,000
Wattsmart Batteries Program	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	5,000,000	5,000,000
Low Income (Sch. 118)	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	250,000	250,000
Home Energy Reports (Sch. N/A)	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	1,550,000	1,550,000
wattsmart Homes Program (Sch. 111)	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	19,500,000	19,500,000
	<u>\$2,591,667</u>	<u>\$2,591,667</u>	<u>\$2,591,667</u>	<u>\$2,591,667</u>	<u>\$2,891,667</u>	<u>\$2,891,667</u>	<u>\$2,891,667</u>	<u>\$2,941,667</u>	<u>\$2,941,667</u>	<u>\$2,591,667</u>	<u>\$2,691,667</u>	<u>\$2,591,667</u>	<u>32,800,000</u>	<u>32,800,000</u>
Commercial & Industrial Sector Programs														
wattsmart Business Commercial (Sch. 140)	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	36,000,000	36,000,000
wattsmart Business Industrial (Sch. 140)														
Industrial Irrigation Load Control (Sch. N/A)	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	500,000	500,000
C&I Load Control Program (pending)	\$83,333	\$83,333	\$83,333	\$83,333	\$83,333	\$83,333	\$83,333	\$83,333	\$83,333	\$83,333	\$83,333	\$83,333	1,000,000	1,000,000
	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>\$3,125,000</u>	<u>37,500,000</u>	<u>37,500,000</u>
Outreach and Communications	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	1,500,000	1,500,000
Portfolio (TRL, DSM Central, Training)	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	250,000	250,000
Program Evaluation Cost - C&I	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	510,597	510,597
Program Evaluation Cost - Res	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	111,080	111,080
2021 Potential Study	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	77,500	77,500
Total DSM Program Expenditures	<u>5,920,765</u>	<u>5,920,765</u>	<u>5,920,765</u>	<u>5,920,765</u>	<u>6,220,765</u>	<u>6,220,765</u>	<u>6,220,765</u>	<u>6,270,765</u>	<u>6,270,765</u>	<u>5,920,765</u>	<u>6,020,765</u>	<u>5,920,765</u>	<u>72,749,177</u>	<u>72,749,177</u>

Notes;
 Jan-Sep 2021 actuals
 Accruals added to capture full cost through Sep
 Split for WSB program cost was based on 2020 kWh
 savings (76% / 24%)

Estimated Peak Impact of Irrigation Load Control By Week

Program Weeks	25-May	3-Jun	10-Jun	17-Jun	24-Jun	1-Jul	8-Jul	15-Jul	22-Jul	29-Jul	5-Aug	12-Aug
Estimated Load Reduction (2022)	10	11	12	14	15	14	14	14	15	15	14	13
Participating Load (2022)	29	29	29	29	29	29	29	29	29	29	29	29
Percent Participating Load	37%	37%	41%	50%	52%	50%	49%	48%	51%	51%	47%	44%



Note:

2022 expected impact is based on weekly load availability results for Utah's irrigation program during the 2017 - 2021 control seasons. Actual impact at peak will be dependent on when monthly peaks occur throughout the 2022 control months

Detail Pivot

Group New Energy Efficiency

Sum of Summer Peak		Column Labels																				
Row Labels		2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	Grand Total
ID		4	6	8	10	14	18	22	28	33	39	45	53	55	59	63	66	69	74	78	83	828
UT		39	77	122	160	220	271	329	403	452	529	586	689	692	736	773	795	806	854	904	966	10,405
Annual Measures 1 (Best)		0	23	49	71	103	126	153	186	205	237	257	298	294	311	323	328	323	342	361	387	4,377
Annual Measures 2		0	3	7	11	17	24	30	39	45	53	59	68	69	74	79	84	88	96	105	114	1,065
Annual Measures 3 - Non-Weather		0	1	1	2	3	4	5	6	7	8	9	10	10	9	9	10	9	9	10	10	133
Annual Measures 3 - Weather		0	1	2	3	4	6	8	11	13	15	17	20	20	22	23	23	24	25	26	28	290
Annual Measures 4 - Non-Weather		0	0	1	1	2	3	4	5	6	7	7	8	8	7	7	7	7	7	7	7	102
Annual Measures 4 - Weather		0	2	5	8	13	19	26	35	43	52	60	73	76	82	88	90	92	94	95	97	1,051
Annual Measures 5 - Non-Weather		0	0	1	1	1	2	2	3	3	3	3	3	3	2	2	2	1	1	1	2	39
Annual Measures 5 - Weather		0	0	0	1	1	2	2	3	4	5	6	7	7	8	9	9	9	9	10	9	102
Annual Measures 6 - Non-Weather		0	0	1	1	2	2	3	4	4	5	5	6	6	5	5	4	4	3	3	3	66
Annual Measures 6 - Weather		0	1	3	4	8	12	17	24	31	40	48	61	65	72	79	82	85	88	91	93	905
Highest Cost Measures		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Home Energy Report		7	7	7	7	8	8	8	8	8	8	8	9	8	8	8	8	8	8	8	8	156
Planned 2021		32	33	34	33	36	36	37	38	37	38	38	40	37	37	37	37	36	35	35	35	720
Summer Measures 10 - Non-Weather		0	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	2	2	2	14
Summer Measures 10 - Weather		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	3	5
Summer Measures 11 - Non-Weather		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	3	4	5	16
Summer Measures 11 - Weather		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	4
Summer Measures 7 - Non-Weather		0	0	0	0	0	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	17
Summer Measures 7 - Weather		0	3	6	9	14	19	23	28	31	35	37	42	42	44	46	46	45	45	46	47	609
Summer Measures 8 - Non-Weather		0	1	2	2	4	5	6	7	8	9	9	11	10	10	11	11	11	11	11	11	149
Summer Measures 8 - Weather		0	0	0	0	0	0	0	0	0	6	12	20	24	30	35	39	42	45	48	50	351
Summer Measures 9 - Non-Weather		0	0	0	0	0	0	1	1	1	2	2	2	2	2	2	2	2	2	2	2	24
Summer Measures 9 - Weather		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7	13	19	26	65
Winter Measures 1 (Best)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Winter Measures 2		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
Winter Measures 3		0	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	1	1	2	14
Winter Measures 4		0	0	0	0	0	0	0	0	0	1	1	1	1	1	2	2	2	2	3	3	18
Winter Measures 5		0	1	3	3	3	2	3	4	4	4	5	5	5	5	6	7	8	10	13	15	106
Winter Measures 6		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	2
WY		6	12	18	29	45	61	77	98	111	130	142	164	161	167	173	177	177	182	188	199	2,318
Grand Total		48	95	149	199	280	349	429	529	597	698	773	906	907	962	1,009	1,039	1,052	1,111	1,170	1,248	13,551

Sum of Summer Peak		Column Labels									
Row Labels		2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
ID		3.68	2.28	2.38	1.94	3.93	3.83	4.46	5.74	4.71	6.44
UT		38.66	38.81	44.95	37.21	60.76	50.37	58.47	74.26	48.91	76.76
WY		5.52	6.12	6.60	11.24	15.66	15.50	16.69	20.39	13.49	18.32
Grand Total		47.86	47.20	53.93	50.39	80.35	69.70	79.62	100.39	67.11	101.52

CERTIFICATE OF SERVICE

Docket No. 21-035-45

I hereby certify that on November 1, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

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