



December 1, 2021

Docket No: 21-035-45

**VIA ELECTRONIC FILING**

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

**Re: Docket No. 21-035-45—In the Matter of Rocky Mountain Power’s Semi-Annual Demand-Side Management (DSM) Forecast Reports**

Utah Clean Energy (“UCE”) and the Southwest Energy Efficiency Project (“SWEEP”) appreciate the opportunity to provide comments on Rocky Mountain Power’s (“RMP”) Annual Demand-Side Management Forecast Report (“Forecast Report”). Generally, UCE and SWEEP support the 2022 DSM targets included in the report, and RMP’s decision to maintain the Schedule 193 surcharge to support its portfolio of cost-effective programs. We congratulate RMP for its efforts to increase demand response targets in the 2022 Forecast Report, as demand response is playing a critical role in grid stability as the utility system incorporates increased amounts of renewable energy.

The one issue of concern in the Forecast Report is the estimated incremental savings in MWh for 2022 on page 4, which shows that the 2022 incremental Class 2 savings may be under the 2021 IRP Class 2 savings goal.<sup>1</sup> Our understanding is that the forecasted savings for 2022 in the Forecast Report should be limited to incremental savings in order to be consistent with the IRP. RMP has independently confirmed this in a recent conversation with UCE and SWEEP. The way the report currently presents the Total Class 2 Estimated Range of savings for 2022, which is 304,216 – 336,239 MWh, includes non-incremental savings from Home Energy Reporting (“HER”). In a separate conversation, RMP confirmed that it included its entire Utah customer base (or close to the entire customer base) in the HER program in 2021. The total savings from this in 2021, which are estimated to be 95,257 MWh, will therefore not be incremental savings in 2022. However, the HER line under the Class 2 DSM – Residential section in the 2022 Forecast Report contains these non-incremental savings from 2021. Removing those savings shows that the estimated *incremental* Class 2 savings is 241,905 – 267,369 MWh, potentially less than the IRP target, which is 257,465 MWh. Ratepayers will be

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<sup>1</sup> Docket No. 21-035-45, Rocky Mountain Power’s November 1 Annual Demand Side Management Deferred Account and Forecast Report, Page 4 (showing that the incremental savings range is 241,905 – 267,369 MWh, and the 2021 IRP savings for 2022 are 257,465).



best served if RMP achieves or exceeds the top figure in this range with cost-effective DSM savings.

UCE and SWEEP support the HER program and find it to be one of RMP’s most cost effective and valuable efficiency programs.<sup>2</sup> However, when comparing forecasted 2022 savings to the identified savings in the IRP preferred portfolio, it is important to use only incremental savings because the IRP portfolio does not include non-incremental HER programs.<sup>3</sup> This means that if RMP’s 2022 Class 2 savings are less than the 2022 IRP Class 2 goal, we expect that RMP will need to find additional Class 2 savings outside the HER program because it has already included all existing customers in the program in 2021.<sup>4</sup> We also reiterate our position that incremental savings should mostly come from technology-based Class 2 measures because the IRP DSM bundles are largely made up of technology-based measures, not behavioral measures. We recommend prioritizing technology-based DSM measures in the residential sector. This is a priority because the technology-based residential DSM target is lower in the 2022 Forecast Report as compared to previous years. In 2022, the residential DSM target is 59,555 MWh. In contrast, over the previous 5 years the amount of residential DSM is typically higher, ranging from 76,495 in 2020 to 102,499 MWh in 2015. UCE and SWEEP look forward to discussing this issue in greater detail during forthcoming DSM Steering Committee meetings with RMP and other Steering Committee members.

UCE and SWEEP would like to make one recommendation for future Forecast Reports regarding the table entitled “2022 Savings Forecast and Integrated Resource Plane Targets” on page 4 of RMP’s November 1<sup>st</sup> filing. We recommend that RMP move any non-incremental forecasted savings from all measures and programs from this table to a separate table to maintain consistency across the different measures and to enhance clarity. This will enable regulators and stakeholders to see more easily what incremental savings RMP is anticipating for each measure during the forecasted year. This would also make it easier for parties to compare the estimated incremental savings to the demand side management and demand response selections from the IRP. UCE and SWEEP would be happy to work with RMP and other members of the Steering

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<sup>2</sup> Docket No. 21-035-33, Rocky Mountain Power’s 2020 Annual Energy Efficiency and Peak Load Report, Table 13, page 20, *found at*: <https://pscdocs.utah.gov/electric/21docs/2103533/318902RdctdRMPDSM2020AnlEnrgEfcncyPkLdRdctnRprt5-28-2021.pdf>.

<sup>3</sup> PacifiCorp’s 2021 Integrated Resource Plan, Volume II, Page 13 (“Plexos then determines the amount of Class 2 DSM—expressed as supply curves that relate incremental DSM quantities with their costs...”); PacifiCorp’s 2019 Integrated Resource Plan, Volume I, Page 249 (“the load forecast used as an input to the IRP does not reflect any incremental investment in new energy efficiency programs; rather, the load forecast is reduced by the selected additions of energy efficiency resources in the IRP”).

<sup>4</sup> UCE and SWEEP do recognize that some incremental HER savings may exist—for example, from new customers who were not included in the program in 2021—but we believe most savings from the HER program will no longer be considered incremental savings starting next year.



Committee to address this in future reports, but we believe that only showing incremental savings is the cleanest way of representing this information.

Thank you for the opportunity to provide comments.

Sincerely,

/s/ Kevin Emerson  
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Decarbonization  
Utah Clean Energy

/s/ Justin Brant  
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Southwest Energy Efficiency Project

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