

December 16, 2021

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Secretary

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

On November 4, 2020, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment period in the above referenced matter, allowing parties to file comments by December 1, 2021, and reply comments by December 16, 2021. On December 1, 2021, the Division of Public Utilities (the “Division”) filed comments, and Utah Clean Energy (“UCE”) and Southwest Energy Efficiency Project (“SWEEP”) filed joint comments.

The Division’s comments recommend acknowledgement that the Company’s filing complies with Commission Orders. UCE/SWEEP’s comments also generally support the 2022 DSM targets, but raise concerns with respect to the format of the Company’s forecast and how the Home Energy Report’s (“HER”) program incremental and non-incremental savings are portrayed.

**DISCUSSION**

Since the inception of the HER program in 2012, it has achieved incremental savings over the years. If the HER program achieves more savings than it did the previous year by expanding to additional customers, the additional savings are incremental and are counted towards the Integrated Resource Plan (“IRP”) Class 2 targets given that the IRP includes HER incremental savings in its modeling. The IRP assumes the savings achieved in previous years from the HER program will continue to be achieved in subsequent years so long as reports are continually sent to customers. Savings achieved in previous years for the HER program that are assumed to be achieved again in subsequent years are non-incremental and are not counted towards the IRP target. All other Class 2 programs in the Company’s forecast reports only reflect incremental savings.

The Company’s forecast reports have historically included line items with estimated savings ranges that include both incremental and non-incremental savings from the HER program for transparency, however only incremental HER savings are counted towards the IRP Class 2 targets. The savings ranges are provided to reflect that the IRP target is neither the ceiling nor the floor for what the Company may achieve. While the preferred outcome is to achieve the Class 2 IRP target, achieved savings are greatly dependent upon customer participation, the timing of when projects close, and many other factors including the continual impacts of the COVID-19 pandemic.

As stated in the Company's reply comments in Docket No. 20-035-31 regarding the forecast report for 2021, one of the adaptive actions the Company took to counter the impacts of COVID-19 was to expand the HER program to any customer with an email address on file. As a result of the expansion, the HER program is expected to achieve significant incremental savings in 2021. The savings forecasted to be achieved by the HER program in 2021 are assumed to be achieved again in 2022 if reports continue to be sent to customers, and were reflected in the Company's forecast for 2022 submitted November 1, 2021 in Docket No. 21-035-45 ("2022 Forecast"). The HER program savings in 2022 however will not be incremental and will not count towards the IRP target. As reflected in the 2022 Forecast, the line item in the Company's 2022 estimated Class 2 savings range that excludes non-incremental HER program savings is 241,905 - 267,369 megawatt-hours ("MWh") at generation, which aligns with the IRP target of 257,465 MWh.

## CONCLUSION

The Company's Total Class 2 incremental savings range in the 2022 Forecast aligns with the IRP target and is consistent with the Company's forecast reports from previous years. Additionally, with the HER program expanded to all customers with email addresses, the Company does not anticipate having material incremental HER program savings for the foreseeable future. As a result, the Company will discuss with the DSM Steering Committee if there is preference to update how the Company's forecast reports reflect HER program savings going forward.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is written in a cursive style with a long horizontal flourish at the end.

Michael S. Snow  
Manager, Regulatory Affairs

Enclosures