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DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: The Public Service Commission of Utah

From: The Office of Consumer Services

Michele Beck, Director
Alex Ware, Utility Analyst

Date: December 27, 2021

Subject: Docket 21-035-65

In the Matter of: the Request of Rocky Mountain Power for Approval of its 2022 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management

INTRODUCTION

On December 3, 2021, Rocky Mountain Power (RMP) filed with the Public Service Commission (PSC) a Request for Approval of its 2022 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management (Plan). Also on December 3, 2021, the PSC issued a Notice of Filing and Comment Period allowing that interested parties may submit comments on or before December 27, 2021. The Office of Consumer Services (OCS) provides the following comments pursuant to that schedule.

On June 22, 2009, Docket 09-035-36, RMP received Commission approval to implement an outreach and communications program for RMP's energy efficiency and peak management programs (Campaign). The Campaign was intended to increase awareness and participation in RMP's energy efficiency and peak reduction programs. Although initially approved for a period of three years, RMP has received approval annually since 2009 for its outreach and communications plans.

Like most recent years, RMP again proposes a budget of \$1.5 million for the 2022 Communications Plan and requests an effective date of January 3, 2022.

RESEARCH RESULTS

RMP hired two research firms, MDC Research and Escalent, to conduct on-line surveys of residential and commercial customers. RMP states that the results of the surveys show that RMP's marketing and communications outreach efforts are having a positive effect with both residential and business customers.¹

The surveys identified five key takeaways:

- Familiarity with energy efficiency communications and importance of conservation remains strong among residential and business customers.
- The world has shifted in light of the COVID-19 pandemic, and focus has shifted for many customers, making energy efficiency less top of mind.
- Based on research findings, more direct email will be added to the Company's outreach in addition to advertising through television, digital media, social media, online, radio, and print.
- Customers feel it is important for Rocky Mountain Power to help them conserve energy.
- Rocky Mountain Power is the first source for energy efficiency information.

RMP's strategy is to use research to continually improve awareness efforts for energy efficiency to support wattsmart programs and energy conservation in general. Those efforts as identified by RMP include:

- Continue to promote Wattsmart choices to support Rocky Mountain Power's "Powering Your Greatness" brand essence that empowers customers with options to save energy and money.
- Continue to use messaging in market that reflects where RMP's customers are at in light of COVID19. This includes recognizing that energy efficiency may be less top of mind, and that saving money has increasingly become a relevant concern.
- Maintain targeted media channels with adjustments for trends, cost and impact.
- Engage customers online and through direct email.
- Continue outreach to the next generation of energy savers with engaging energy efficiency education.
- Consider economic impact on our customers in light of COVID-19 pandemic.
- Refresh business creative to continue to inform customers about their energy usage and solutions to help lower their bills.
- Utilize new data/research tools through Qualtrics in 2022 that will give actionable information to help RMP more effectively reach customers.
- Take advantage of new communications tools through Oracle to enable RMP to communicate on a quick and increasingly personal level with customers, helping RMP support unique customer needs.

¹ The application provides additional detail regarding the surveys.

PROPOSED BUDGET

RMP requests approval of \$1.5 million for the 2022 Communications Plan, which covers the period from January 1, 2022 to December 31, 2022. Expenses associated with the 2020 Communications Plan were included in RMP’s forecast of expenses in the DSM Deferred Account & Forecast Report filed November 1, 2021 in Docket No. 21-035-45. RMP expresses its belief that the “proposed budget is critical to the continued success of RMP’s Wattsmart program portfolio”.

RMP includes a breakdown of the budget expenses by “tactic” as follows:

Tactic	Budget
Media	\$650,000
Creative/Production/Planning	\$240,000
Wattsmart Business events and sponsorships	\$90,000
General PR and public affairs support	\$33,000
Wattsmart School Curriculum Program	\$259,000
Research	\$28,000
Customer Energy Insights Reports	\$200,000
Total	\$1,500,000

APPROACH AND CAMPAIGN COMPONENTS

RMP states that messaging for the 2022 campaign will continue to “remind and empower customers to adopt energy-efficient behaviors and choose energy-efficient equipment to realize long-term financial savings as well as other operational environment benefits.” [Page 14]

After a focus last year on promoting the Wattsmart Small Business program, this new plan seems to put focus on using new data tools to better determine and market to individual customer needs. RMP states the 2022-year plan is designed to “provide integrated, customer-centered insights, information and suggested actions, leveraging key life moments and optimizing the customer experience. They also intend to promote greater awareness of the benefits of the new Wattsmart Business energy analyzer.

Results from MDC Research indicate the following:

“[O]ver two in five business customers agree that Rocky Mountain Power “Provides information on how to control energy costs” (40% compared to 40% in 2020) and “Offers solutions to help customers use energy efficiently” (36% compared to 39% in 2020). Perceptions are slightly lower for “Provides information about products and services that are of value to your organization” (36% compared to 36% in 2020) and “Helps your company/organization by providing incentives to save money on energy bills (29% compared to 25% in 2020). [Page 11]

Also, RMP states it launched a new creative campaign in Q2 of 2020 that focuses on the current economic climate while still aligning with the market research and the “Powering Your Greatness” brand. While the campaign will maintain a focus on efficient energy practices and benefits, the messaging will be directed to the total and diverse customer group with an emphasis on getting a targeted message to the right targeted audience member by utilizing customer data and feedback to shape messaging.

OCS CONCLUSIONS

The OCS recognizes an increased general practice of businesses finding new ways to leverage customer information to improve operations and we also generally do not take issue with such actions if they use customer information appropriately. That being said, the OCS notes that RMP’s 2022 Communications and Outreach Action Plan does not provide any information on if the Company’s new plans raise any confidentiality concerns. The OCS will not oppose RMP’s proposed Communications and Outreach plan for 2022, but hopes the Company will provide an assessment and/or assurances in reply comments that customer data will be used appropriately.

RECOMMENDATION

The OCS recommends that the PSC approve RMP’s 2022 Communications and Outreach Action Plan and Budget for DSM.

cc:

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Jana Saba, Rocky Mountain Power
Chris Parker, Division of Public Utilities