
Request of Rocky Mountain Power for Approval of its 2022 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management	<u>DOCKET NO. 21-035-65</u> <u>ORDER APPROVING</u> <u>STRATEGIC COMMUNICATIONS AND</u> <u>OUTREACH PLAN FOR DEMAND SIDE</u> <u>MANAGEMENT PROGRAMS</u>
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ISSUED: January 11, 2022

PROCEDURAL HISTORY

In Docket No. 09-035-36, the Public Service Commission (PSC) issued an order authorizing Rocky Mountain Power (RMP) to implement a Strategic Communications and Outreach Plan for Demand Side Management (DSM) programs in Utah for a three-year period (“2009 Order”).¹ Since the initial three-year period, RMP has filed and requested approval of strategic communications and outreach plans for DSM each year.

On December 3, 2021, RMP filed a request for approval of its 2022 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management, January 1, 2022 – December 31, 2022 (“2022 Plan”), with a requested effective date of January 3, 2022. The Division of Public Utilities (DPU) filed comments on December 16, 2021. The Office of Consumer Services (OCS) filed comments on December 27, 2021.

THE APPLICATION

In the 2022 Plan, RMP provides a detailed action plan and proposes a budget of \$1.5 million. RMP states it included the expenses associated with the 2022 Plan in its forecast of

¹ See *In the Matter of the Application of PacifiCorp d/b/a Rocky Mountain Power filing for Approval of a Proposed Strategic Communications and Outreach Program for Demand Side Management*, Docket No. 09-035-36, Order Approving Program with Conditions issued June 11, 2009.

expenses in the Annual Demand Side Management Deferred Account and Forecast Report, filed November 1, 2021 in Docket No. 21-035-45.²

In its 2022 Plan, RMP provides a summary of the 2021 survey results and detailed information on proposed activities for continuing the Campaign through 2022. The Campaign's focus for 2022 is to continue using RMP's "WattSmart" marketing campaign to generate residential and business awareness of RMP's energy conservation programs and to promote energy efficiency and energy conservation in general. RMP's stated strategies for the 2022 campaign include:

- promoting "WattSmart choices" as an expression of RMP's "Powering Your Greatness" brand that includes energy saving programs for customers;
- increasing advertising through targeted media channels, with a greater proportion of RMP's ad mix delivered through email;
- continuing to emphasize RMP's in-classroom energy efficiency education program in Utah schools;
- continuing to utilize energy insight reports for residential and business customers, including information about low- and no-cost energy efficiency strategies, programs, and incentives;
- engaging with customers through content on RMP's rockymountainpower.net and wattsmart.com websites and driving traffic to those sites through digital, social, and email content;
- recognizing that customers impacted by COVID-19 may prioritize saving money over energy efficiency; and
- utilizing new data, research, and communication tools to understand consumer needs, create actionable items, increase communication, and support customer needs.

In addition, RMP commits to including program evaluation and monitoring in the 2022 Plan to measure success and verify Campaign delivery.

² See *Rocky Mountain Power's Semi-Annual Demand-Side Management (DSM) Forecast Reports* (Rocky Mountain Power's Annual DSM Forecast Report, filed November 1, 2021; Docket No. 21-035-45).

THE PARTIES

DPU recommends PSC approve the 2022 Plan. In making its recommendation, DPU comments that RMP's proposed budget for the 2022 plan is consistent with past plan budgets and complies with the \$1.5 million budget requirement set in the 2009 Order. DPU further comments that the 2022 Plan is similar to DSM strategic communications and outreach plans in previous years and effectively accomplishes the program's goals.

OCS recommends the PSC approve the 2022 Plan, but provides comments on RMP's strategic use of customer information in the 2022 Plan. OCS asserts that the 2022 Plan shifts its focus to "using new data tools to better determine and market to individual customer needs" and that OCS takes no issue with that practice as long as RMP uses customer information appropriately. Ultimately, OCS expresses hope that RMP will provide an assessment of the appropriateness of its use of customer information. RMP did not file reply comments.

DISCUSSION, FINDINGS, AND CONCLUSIONS

Based on the PSC's review of the Plan and on OCS's and DPU's comments and recommendations, we approve the Plan as filed. The Plan complies with the \$1.5 million budget constraint set forth in the 2009 Order, and reasonably furthers the goal of increasing awareness and participation in RMP's energy efficiency and peak reduction programs. Given those attributes, the PSC concludes the Plan complies with the requirements described in the 2009 Order.

The PSC recognizes OCS's comments seeking clarity that RMP will handle customer information carefully when leveraging that information in executing the 2022 Plan. We ask RMP to provide to the DSM steering committee, prior to RMP's next communications and outreach

action plans for demand side management, an assessment of its practices in handling the customer information it leverages to accomplish strategic communications and outreach goals.

ORDER

We approve RMP's 2022 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management, January 1, 2022 – December 31, 2022 as filed.

DATED at Salt Lake City, Utah, January 11, 2022.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Ron Allen, Commissioner

Attest:

/s/ Gary L. Widerburg
PSC Secretary
DW#321885

Notice of Opportunity for Agency Review or Rehearing

Pursuant to Utah Code Ann. §§ 63G-4-301 and 54-7-15, a party may seek agency review or rehearing of this written order by filing a request for review or rehearing with the PSC within 30 days after the issuance of the order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the PSC fails to grant a request for review or rehearing within 30 days after the filing of a request for review or rehearing, it is deemed denied. Judicial review of the PSC's final agency action may be obtained by filing a Petition for Review with the Utah Supreme Court within 30 days after final agency action. Any Petition for Review must comply with the requirements of Utah Code Ann. §§ 63G-4-401, 63G-4-403, and the Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on January 11, 2022, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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