



1407 W. North Temple, Suite 330
Salt Lake City, Utah 84116

March 16, 2021

VIA ELECTRONIC FILING

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

Attn: Gary Widerburg
Commission Secretary

RE: Advice No. 21-02
Proposed Changes to Schedule 105, Irrigation Load Control Program
Docket No. 21-035-T04

Enclosed for electronic filing are the proposed tariff sheets associated with Tariff P.S.C.U. No. 51 of PacifiCorp, d.b.a. Rocky Mountain Power (the “Company”), applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405-2(D), the Company states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Company respectfully requests an effective date of April 16, 2021 for these changes.

First Revision of Sheet No. 105.1 Schedule 105 Irrigation Load Control Program

The purpose of this filing is to propose updated parameters for the Irrigation Load Control Program (“Program”) to provide the most benefits and to be consistent with the Company’s other demand response programs. Proposed changes to the Schedule 105 tariff sheets are included as Exhibit A. These changes align with targets illustrated in the table below, filed in the Demand Side Management (“DSM”) Deferred Account and Forecast Report on November 2, 2020, in Docket No. 20-035-31.

2021 Budget and Savings Forecast

***	2021 MW Savings Forecast	2021 Budget Forecast
Irrigation Load Control	20	\$650,000

DISPATCH PARAMETERS

The current dispatch period for Schedule 105 is June 1st through August 15th annually. It is proposed to extend the dispatch period to May 1st through September 30th to utilize the Program when irrigation is contributing to overall system load. It is further proposed to shift the current dispatch hour range of 12:00pm to 8:00pm to be 2:00pm to 9:00pm Mountain Time. With

renewable energy becoming a larger percentage of the Company's generation portfolio, there is an increasing need and benefit to utilize demand response later in the evening. Like the Cool Keeper program, the Irrigation Load Control program may evolve to a more real-time structure to take advantage of frequency response benefits. In the past, the Program has been structured with a day ahead notice prior to any dispatch event; however, beginning with the 2021 season, the Program will shift to a 4-hour notice structure prior to any event. The "Program Provider" section of Schedule 105 has also been removed as the Program may not be operated by a third party in the future as the Program evolves. The Company believes that these proposed changes will maximize the value to customers and the Company, positioning the Program to utilize load control resources more effectively with minimal customer impact.

Additional language is also being added to Schedule 105 to clarify and define when emergency events may be used to satisfy requirements of the North America Electric Reliability Corporation standard for Contingency Reserve Obligation and may be deployed when the Company is experiencing a qualifying event as defined by the Northwest Power Pool. This language is consistent with the language stated in Schedule 114 for the Company's other load management programs.

COST EFFECTIVENESS

The most recent cost effectiveness analysis done for the Program was included as Confidential Appendix 8 to the Company's 2019 DSM Annual Report filed June 1, 2020 in Docket No. 20-035-27. The Program passed cost effectiveness with a benefit to cost ratio of 1.0 or better in Confidential Appendix 8. The proposed changes in this Advice Letter are expected to add additional benefits to the Program without adding additional costs. Accordingly, the Program is expected to remain cost effective if these proposed changes are approved.

STAKEHOLDER FEEDBACK

On March 3, 2021 the Company circulated a draft of this advice letter to DSM Steering Committee members for initial review and comment. After receiving several questions and concerns from the Division of Public Utilities (Division) and the Office of Consumer Services (Office), the Company met with both the Division and the Office separately to discuss and provide clarity. As a result of those meetings, the Advice Letter was updated to reflect what had been agreed upon. Notwithstanding the meetings already held, the Company further intends to discuss the Program during the next DSM Steering Committee meeting, scheduled March 23, 2021.

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

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

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

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

CERTIFICATE OF SERVICE

Docket No. 21-035-T04/Advice No. 21-02

I hereby certify that on March 16, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov
ocs@utah.gov

Division of Public Utilities

dpudatarequest@utah.gov

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Mary Penfield
Adviser, Regulatory Operations

Exhibit A

ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 105

STATE OF UTAH

Irrigation Load Control Program

PURPOSE: This optional tariff allows Customers taking service under Electric Service Schedule No. 10 to participate in a demand response program where for a financial incentive the Company has the right to interrupt service.

APPLICABLE: Available to qualifying customers on Schedule 10.

PROGRAM DESCRIPTION: A detailed description of the program can be found on the Company website at: www.rockymountainpower.net/UILC.

- **Mandatory Program Events:** The Company shall have the right to implement a Mandatory Dispatch Event according to the following criteria:
 - a) Dispatch Period: Week including ~~May~~June 1 through ~~week including August~~
15September 30
 - b) Available Dispatch Hours: ~~4~~2:00 PM to ~~9~~8:00 PM Mountain Time
 - c) Maximum Dispatch Hours: 52 hours per Program Year
 - d) Dispatch Duration: Not more than four hours per Dispatch Event or twelve hours per week
 - e) Dispatch Event Frequency: limited to a single (1) Dispatch Event per day
 - f) Dispatch Days: Monday through Friday, excluding holidays

In the event of a system emergency, Rocky Mountain Power may, at its discretion, expand the dispatch criteria beyond the parameters listed. Emergency events may be used to satisfy requirements of the North American Electric Reliability Corporation (NERC) standard BAL-002-WECC-2 for Contingency Reserve Obligation (CRO) and may be deployed when the utility is experiencing a qualifying event as defined by the Northwest Power Pool.

- **Voluntary Program Events:** The Company shall have the right to implement a Voluntary Program Event as needed from ~~May~~June 1 through September 30. Participating Customers may choose to opt-out of Voluntary Program Events with no

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0421-035-T04/Advice No. 21-02

penalties or reductions in their financial compensation for participation in the Irrigation Load Control Program.

- ~~• **Program Provider:** The Irrigation Load Control Program will be operated by a third party load control program provider. Participating Customers will contract directly with and receive financial incentives directly from the Program Provider.~~

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FILED: March 16, 2021

EFFECTIVE: April 16, 2021