

November 1, 2022

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

Re: In the Matter of Rocky Mountain Power's Annual Demand Side Management
November 1st Deferred Account and Forecast Reporting
Docket No. 22-035-37

In its order dated August 25, 2009 in Docket No. 09-035-T08 ("Order"), the Public Service Commission of Utah ("Commission") approved the Phase I Stipulation filed August 3, 2009 in the same ("Stipulation"). As specified in the Stipulation, Rocky Mountain Power ("Company") is required to provide to the Commission and Demand Side Management ("DSM") Advisory Group¹ ("Steering Committee") by November 1st of each year a forecast of expenditures for approved programs for the next calendar year and their acquisition targets (in MWh and MW) for the next calendar year. In addition, the order issued December 21, 2011 in Docket No. 10-035-57 directed the Company to provide an estimate of the capacity and energy savings targets for approved programs in the forecast in comparison to demand-side management program targets included in the Company's most recent Integrated Resource Plan. A report containing the forecast of these items for calendar year 2022 is provided in Exhibit A, attached hereto ("Forecast Report").

The Accounting Analysis section of the Forecast Report reflects actual results through September 2022 and projects expenditures and revenues through December 2030. As illustrated in the Accounting Analysis, the Schedule 193 surcharge rate is estimated to remain flat through 2024 under current assumptions. Consequently, the Company does not intend to propose a rate adjustment to Schedule 193 at this time.

Expenditure information for individual DSM programs is provided in the DSM Expenditure section of the Forecast Report. DSM Expenditures include actual results through September 2022 and projects expenditures through December 31, 2023. Also included in the Forecast Report, and in compliance with the Commission's February 10, 2012 Acknowledgement Letter in Docket No. 10-035-57, is an estimate of total program participation and contribution to peak system load for the Irrigation Load Control Program. This analysis is included in the Peak Impact section of the Forecast Report.

¹ In context of this filing, DSM Advisory Group is redefined as the DSM Steering Committee.

Public Service Commission of Utah

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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

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

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

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael S. Snow
Manager, Regulatory Affairs

cc: Division of Public Utilities
 Office of Consumer Services

Enclosures

Exhibit A

2023 Forecast Savings compared to Resource Plan Targets

	2023 Program Forecast		2021 Integrated Resource Plan	
	MWH @ Gen	MW	MWH	MW
	2023	2023	2023	2023
Class 1 DSM - Residential, Commercial, Industrial				
Air Conditioner Load Control - Res. & Small Com. (Sch. 114)		276		N/A
Wattsmart Batteries Program (Sch. 114)		27		N/A
Irrigation Load Control - Industrial (Sch. 105)		14		N/A
C&I Load Control Program (Sch. 114)		82		N/A
Total Class 1		399		287.4
Class 2 DSM - Residential				
Low Income Weatherization (Sch. 118)	178	0	N/A	N/A
Wattsmart Homes (Sch. 111)	54,112	9	N/A	N/A
Total Class 2 Residential	54,290	9	N/A	N/A
Class 2 Non-Residential Programs				
wattsmart business (Sch. 140)	211,384	36	N/A	N/A
Total Class 2 Non-Residential	211,384	36	N/A	N/A
Total Class 2	265,674	44.81	266,500	44.95
Total Class 2 Estimated Range	252,391 - 278,958			
Misc.				
Home Energy Reporting (Sch. N/A)	109,319	18		

Notes:

1. 2021 IRP Volume I Table 6.10 pg. 147 lists 124 MW of existing capacity for air conditioner load and 205 MW of existing capacity for irrigation load, 20 MW of which is in Utah, totaling 144 MW of existing load control capacity. Volume II Appendix D Table D.3 pg. 109 lists a total of 143.4 MW of incremental summer capacity for Utah for 2022-2023, allocated to batteries, C&I, irrigation, and air conditioning. The combined total of existing plus incremental capacity is 287.4 MW (144 MW + 143.4 MW).

5. Irrigation forecast represents highest expected realized value during the season (see "Irrigation Load Peak Impact" tab for an estimate by week throughout season).

6. Air conditioner load control (Cool Keeper) forecast represents the expected contribution/impact available at peak, temperature dependent.

7. Total Class 2 DSM: 2021 IRP Vol. II Table D.4 pg. 110 selected 266,500 MWh of energy efficiency for 2023.

8. Forecast of coincident peak MW for **Utah's** Class 2 DSM resource is derived through the following formula:

Forecasted Class 2 DSM energy savings	265,674	MWh
Divided by 2023 Utah energy selections from the 2021 IRP Appendix D	266,500	MWh
Multiplied by Utah 2023 coincident peak value from the 2021 IRP	44.95	MW
Estimated coincident peak impact of 2023 Utah Class 2 DSM programs excluding Home Energy Reports	44.81	MW

5. 2021 IRP Utah 2020 Energy Efficiency coincident peak contribution from supporting data used to create 2021 IRP Table 9.18 pg. 309.

6. Savings is at generation.

	2020 Full Year Total 2020	2021 Full Year Total 2021	2022 Full Year Total 2022	2023 Full Year Total 2023	2024 Full Year Total 2024	2025 Full Year Total 2025	2026 Full Year Total 2026	2027 Full Year Total 2027	2028 Full Year Total 2028	2029 Full Year Total 2029	2030 Full Year Total 2030	All Years
DSM Spend and Collections												
Program Spend	64,090,327	66,013,215	63,323,214	78,174,177	79,363,451	85,952,755	87,663,894	92,331,815	95,834,856	97,040,454	103,137,124	848,834,954
Collections	48,737,866	70,522,433	71,629,238	73,951,191	75,993,331	86,669,603	97,122,390	105,847,954	111,705,098	118,118,351	123,992,204	935,551,792
Estimated Surcharge Rate	3.56%	3.56%	3.56%	3.56%	3.56%	3.97%	4.39%	4.72%	4.90%	5.12%	5.33%	
Regulatory Asset												
Beginning Balance	139,768,454	179,567,371	224,969,701	255,548,896	294,251,661	326,308,442	356,688,716	380,099,297	401,422,519	422,282,918	439,648,777	
Program Spend	64,090,327	66,013,215	63,323,214	78,174,177	79,363,451	85,952,755	87,663,894	92,331,815	95,834,856	97,040,454	103,137,124	848,834,954
Amortization	(18,400,788)	(24,964,895)	(31,617,619)	(39,471,412)	(47,306,670)	(55,572,480)	(64,253,313)	(71,008,593)	(74,974,457)	(79,674,595)	(83,913,288)	(572,757,322)
Carrying Charge (8.99% rate)		16,366,228	17,474,521	19,412,303	27,777,132	30,486,676	32,869,077	34,839,361	36,730,641	38,443,756	40,078,916	294,478,611
Paydown of Carrying Charge		(16,366,228)	(17,474,521)	(19,412,303)	(27,777,132)	(30,486,676)	(32,869,077)	(34,839,361)	(36,730,641)	(38,443,756)	(40,078,916)	(294,478,611)
Ending Balance	184,618,685	224,969,701	256,675,296	294,251,661	326,308,442	356,688,716	380,099,297	401,422,519	422,282,918	439,648,777	458,872,613	
Regulatory Liability												
Beginning Balance	(154,075,179)	-	(29,191,311)	(51,728,408)	(611,732)	(1,521,261)	(2,131,707)	(2,131,707)	(2,131,707)	(2,131,707)	(2,131,707)	
Collections	(48,737,866)	(70,522,433)	(71,629,238)	(73,951,191)	(75,993,331)	(86,669,603)	(97,122,390)	(105,847,954)	(111,705,098)	(118,118,351)	(123,992,204)	(935,551,792)
Amortization	18,400,788	24,964,895	31,617,619	39,471,412	47,306,670	55,572,480	64,253,313	71,008,593	74,974,457	79,674,595	83,913,288	572,757,322
Carrying Charge (8.99% rate)	(746,049)	-	-	-	-	-	-	-	-	-	-	-
Paydown of Carrying Charge		16,366,228	17,474,521	19,412,303	27,777,132	30,486,676	32,869,077	34,839,361	36,730,641	38,443,756	40,078,916	294,478,611
Coal Accelerated Depreciation Applications	185,158,306	-	-	66,184,152	-	-	-	-	-	-	-	66,184,152
Ending Balance	-	(29,191,311)	(51,728,408)	(611,732)	(1,521,261)	(2,131,707)	(2,131,707)	(2,131,707)	(2,131,707)	(2,131,707)	(2,131,707)	
Net Regulatory Asset/(Liability)												
Ending Balance	184,618,685	195,778,390	204,946,888	293,639,929	324,787,181	354,557,009	377,967,590	399,290,812	420,151,211	437,517,070	456,740,906	
Coal Fund Balance												
Balance per October 2018 Filing	192,000,000	229,000,000	258,000,000	282,000,000	300,000,000	310,000,000	316,000,000					
Balance per current assumptions	185,158,306	214,349,616	236,886,713	251,954,189	252,863,718	253,474,164	253,474,164					
Fund Balance Variance: Surplus/(Deficit)	(6,841,694)	(14,650,384)	(21,113,287)	(30,045,811)	(47,136,282)	(56,525,836)	(62,525,836)					
Assumptions/Comments												
<p>Future collections are estimated based on projected load growth and base rate increase of 1.6% in 2021 Collections surcharge rate is held flat at 3.56% until amortization and carrying charges exceed projected collections, at which point surcharge/collections increased to equal amortization plus carrying charges. \$185m coal plant buy down applied in 2021; and additional \$45m coal plant buy down anticipated in 2023. Includes actuals through Sept 2022.</p>												

DSM Program Expenditures

	YTD Balance Sept 2022	Accrual for Sept	Total thru Sept 2022	Forecast Oct thru Dec 2022			2022 Program Year Spend		
				Oct-22	Nov-22	Dec-22	Projected 2022 Totals	Nov 1, 2021 Forecast	Jul 1, 2022 Forecast
Residential Programs									
A/C Load Control Program (Sch. 114)	\$5,382,559	\$297,403	\$5,679,963	\$273,346	\$273,346	\$273,346	\$ 6,500,000	\$ 6,500,000	\$ 6,500,000
Wattsmart Batteries Program (Sch. 114)	\$2,167,035	\$ -	\$2,167,035	\$200,000	\$250,000	\$300,000	\$ 2,917,035	\$ 5,000,000	\$ 5,000,000
Low Income (Sch. 118)	\$70,331	\$ -	\$70,331	\$59,890	\$59,890	\$59,890	\$ 250,000	\$ 250,000	\$ 250,000
Home Energy Reports (Sch. N/A)	\$590,752	\$ 281,250.00	\$872,002	\$115,000	\$115,000	\$115,000	\$ 1,217,002	\$ 1,550,000	\$ 1,550,000
Wattsmart Homes Program (Sch. 111)	\$12,466,667	\$1,239,746	\$13,706,413	\$1,097,862	\$1,297,862	\$1,397,862	\$ 17,500,000	\$ 19,500,000	\$ 19,500,000
	\$20,677,344	\$1,818,399	\$22,495,743	\$1,746,098	\$1,996,098	\$2,146,098	\$ 28,384,036	\$ 32,800,000	\$ 32,800,000
Commercial & Industrial Sector Programs									
Wattsmart Business Commercial (Sch. 140)	\$15,255,462	\$1,711,506	\$16,966,967	\$2,529,346	\$3,529,346	\$3,529,346	\$ 31,500,000	\$ 36,000,000	\$ 36,000,000
Wattsmart Business Industrial (Sch. 140)	\$4,404,519	\$540,475	\$4,944,994						
Industrial Irrigation Load Control (Sch. N/A)	\$3,712	\$ -	\$3,712	\$165,429	\$165,429	\$165,429	\$ 500,000	\$ 500,000	\$ 500,000
C&I Load Control Program (Sch. 114)	\$0	\$ -	\$0	\$10,000	\$20,000	\$460,000	\$ 490,000	\$ 1,000,000	\$ 1,275,000
	\$19,663,693	\$2,251,981	\$21,915,674	\$2,704,776	\$3,714,776	\$4,154,776	\$ 32,490,000	\$ 37,500,000	\$ 37,775,000
Outreach and Communications									
Portfolio (TRL, DSM Central, Training)	\$156,147	\$54,777	\$210,924	\$13,025	\$13,025	\$13,025	\$ 250,000	\$ 250,000	\$ 250,000
Program Evaluation Cost - C&I	\$298,974	\$41,282	\$340,256	\$56,780	\$56,780	\$56,780	\$ 510,597	\$ 510,597	\$ 510,597
Program Evaluation Cost - Res	\$118,331		\$118,331	(\$2,417)	(\$2,417)	(\$2,417)	\$ 111,080	\$ 111,080	\$ 111,080
Potential Study	\$40,911		\$40,911	\$12,196	\$12,196	\$12,196	\$ 77,500	\$ 77,500	\$ 77,500
Total DSM Program Expenditures	\$ 42,017,127	\$ 4,166,439	\$ 46,183,567	\$ 4,676,549	\$ 5,936,549	\$ 6,526,549	\$ 63,323,214	\$ 72,749,177	\$ 73,024,177

Notes:

Jan-Sept 2022 actuals
Split for WSB program cost was based on 2022 kWh savings (76% / 24%)
Accruals added to capture full cost through Sept.

DSM Program Expenditures

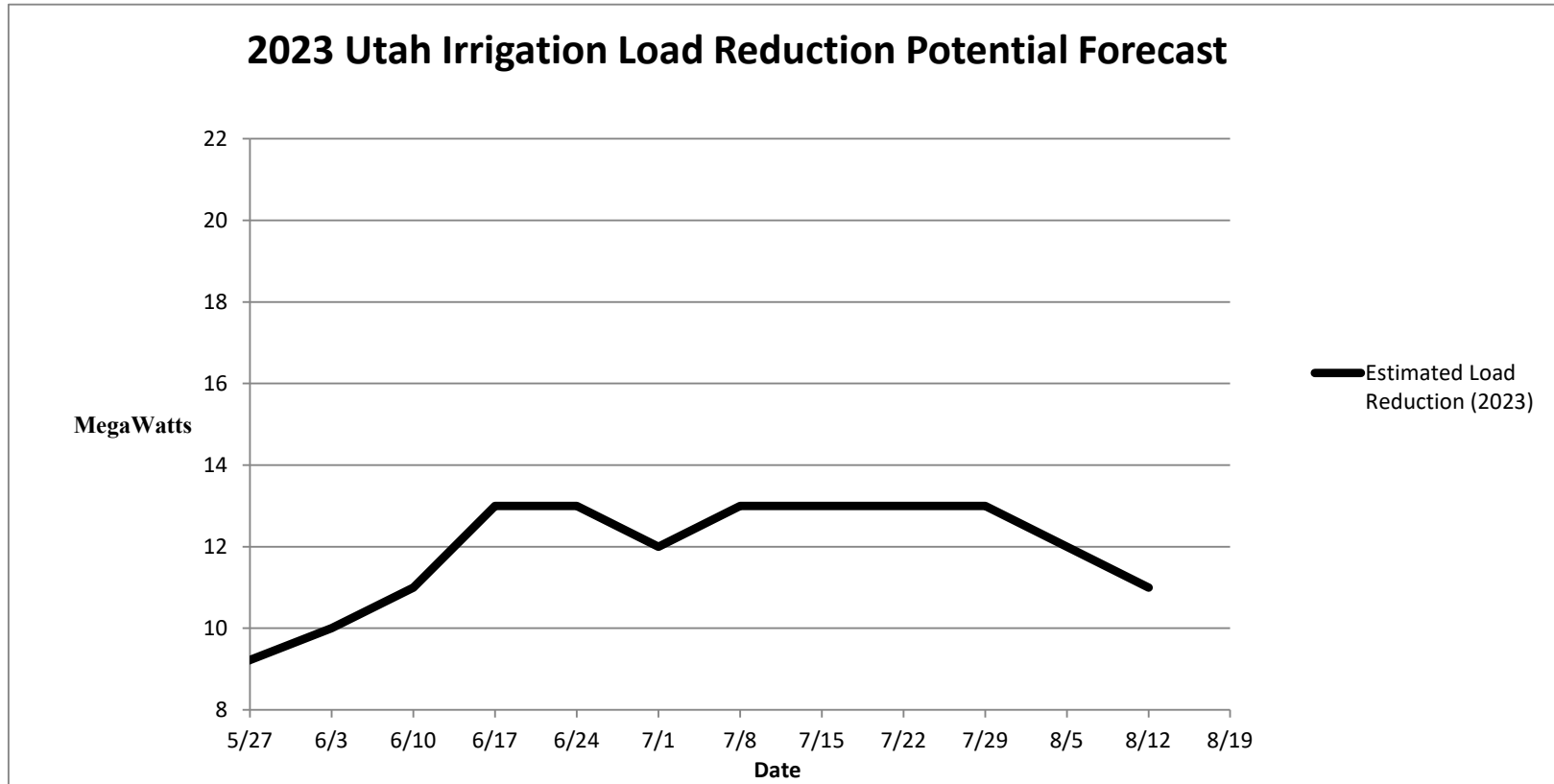
	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan - Dec 2023 Totals	2023 Budget Forecast
Residential Programs														
A/C Load Control Program (Sch. 114)	\$541,667	\$541,667	\$541,667	\$541,667	\$541,667	\$541,667	\$541,667	\$541,667	\$541,667	\$541,667	\$541,667	\$541,667	6,500,000	\$ 6,500,000
Wattsmart Batteries Program (Sch. 114)	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	\$416,667	5,000,000	\$ 5,000,000
Low Income (Sch. 118)	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	250,000	\$ 250,000
Home Energy Reports (Sch. N/A)	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	\$129,167	1,550,000	\$ 1,550,000
Wattsmart Homes Program (Sch. 111)	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	\$1,625,000	19,500,000	\$ 19,500,000
	\$2,733,333	\$2,733,333	\$2,733,333	\$2,733,333	\$2,733,333	\$2,733,333	\$2,733,333	\$2,733,333	\$2,733,333	\$2,733,333	\$2,733,333	\$2,733,333	32,800,000	32,800,000
Commercial & Industrial Sector Programs														
Wattsmart Business Commercial (Sch. 140)	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	\$3,000,000	36,000,000	36,000,000
Wattsmart Business Industrial (Sch. 140)														
Industrial Irrigation Load Control (Sch. N/A)	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	500,000	500,000
C&I Load Control Program (Sch. 114)	\$535,417	\$535,417	\$535,417	\$535,417	\$535,417	\$535,417	\$535,417	\$535,417	\$535,417	\$535,417	\$535,417	\$535,417	6,425,000	6,425,000
	\$3,577,083	\$3,577,083	\$3,577,083	\$3,577,083	\$3,577,083	\$3,577,083	\$3,577,083	\$3,577,083	\$3,577,083	\$3,577,083	\$3,577,083	\$3,577,083	42,925,000	42,925,000
Outreach and Communications														
Portfolio (TRL, DSM Central, Training)	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	1,500,000	1,500,000
Program Evaluation Cost - C&I	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	\$20,833	250,000	250,000
Program Evaluation Cost - Res	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	\$42,550	510,597	510,597
Potential Study	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	\$9,257	111,080	111,080
	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	\$6,458	77,500	77,500
Total DSM Program Expenditures	\$ 6,514,515	\$ 6,514,515	\$ 6,514,515	\$ 6,514,515	\$ 6,514,515	\$ 6,514,515	\$ 6,514,515	\$ 6,514,515	\$ 6,514,515	\$ 6,514,515	\$ 6,514,515	\$ 6,514,515	\$ 78,174,177	78,174,177

Notes:

Jan-Sept 2022 actuals
Split for WSB program cost was based on 2022 kWh savings (76% / 24%)
Accruals added to capture full cost through Sept.

Estimated Peak Impact of Irrigation Load Control By Week

Program Weeks	25-May	3-Jun	10-Jun	17-Jun	24-Jun	1-Jul	8-Jul	15-Jul	22-Jul	29-Jul	5-Aug	12-Aug
Estimated Load Reduction (2023)	9	10	11	13	13	12	13	13	13	13	12	11
Participating Load (2023)	25	25	25	25	25	25	25	25	25	25	25	25
Percent Participating Load	37%	38%	45%	52%	52%	50%	50%	51%	53%	52%	48%	45%



Note:

2023 expected impact is based on weekly load availability results for Utah's irrigation program during the 2017 - 2022 control seasons. Actual impact at peak will be dependent on when monthly peaks occur throughout the 2023 control months

CERTIFICATE OF SERVICE

Docket No. 22-035-37

I hereby certify that on November 1, 2022, 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

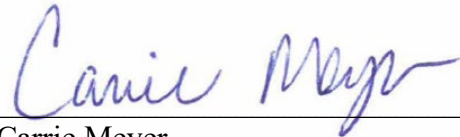
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Rocky Mountain Power

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Carrie Meyer
Adviser, Regulatory Operations