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UTAH DEPARTMENT OF COMMERCE

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To: The Public Service Commission of Utah
From: The Office of Consumer Services
Michele Beck, Director
Alex Ware, Utility Analyst

Date: December 01, 2022

Subject: Docket 22-035-37

In the Matter of: Rocky Mountain Power's Annual Demand-Side Management Deferred Account and Forecast Report

INTRODUCTION

On November 1, 2022, Rocky Mountain Power (RMP or Company) filed with the Public Service Commission of Utah (PSC) its Annual Demand-Side Management (DSM) Deferred Account and Forecast Report. On November 4, 2022, the PSC issued a Notice of Filing and Comment Period establishing that interested parties may submit initial comments about the DSM report on or before December 1, 2022 and reply comments on or before December 16, 2022. The Office of Consumer Services (OCS) provides the following comments pursuant to that schedule.

BACKGROUND

The purpose of RMP's annual DSM deferred account and forecast report is to inform the PSC and stakeholders such as the OCS of its estimated DSM expenditures and energy savings for the upcoming calendar year.

OCS REVIEW OF RMP'S ANNUAL DSM FORECAST REPORT

The OCS reviewed RMP's 2022 report and all pages of Exhibit A which contained spreadsheets of the energy savings forecast, accounting analysis, DSM expenditures, and irrigation load peak impact data. We also compared this information to RMP's annual DSM report from the prior year (2021).

Of particular interest, the OCS notes that the DSM program budget forecast remains unchanged between program years 2022 and 2023 except for the Commercial and

Industrial (C&I) Load Control Program under tariff schedule 114. In accordance with the July 6, 2022 tariff change approval letter from the PSC in Docket No. 22-035-T09, that approved a new C&I program offering, RMP is proposing a budget increase to this program of \$5,425,000 for the 2023 program year. In total, RMP is forecasting a 2023 DSM budget of \$78,174,177. In conjunction with these estimated costs, RMP is forecasting increases in energy savings in 2023 for all Class 1 and Class 2 non-residential only DSM program areas. Class 2 residential program energy savings are estimated to remain unchanged.

Also, the OCS notes that the DSM estimated surcharge rate is forecast to remain unchanged at 3.56% through 2024, so RMP is not proposing a rate increase for 2023.

RECOMMENDATION

Based on the OCS's review of RMP's DSM forecast report filing, the OCS recommends that the PSC approve the 2023 energy savings and expenditure forecasts.

cc:

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Jana Saba, Rocky Mountain Power

Chris Parker, Division of Public Utilities

Service List