

June 6, 2022

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. 22-04
Proposed Changes to Schedule 114, Load Management Program – Docket No. 22-035-T09

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 July 6, 2022, for these changes.

First Revision of Sheet No. 114.1	Schedule 114	Load Management Program
First Revision of Sheet No. 114.2	Schedule 114	Load Management Program
Original Sheet 114.3	Schedule 114	Load Management Program

The purpose of this filing is to propose a new Demand Side Management (“DSM”) Commercial and Industrial Demand Response offering called the Wattsmart Business Demand Response Program (“Program”) to be administered through Electric Service Schedule No. 114. Proposed changes to the Schedule 114 tariff sheets are included as Exhibit A.

WATTSMART BUSINESS DEMAND RESPONSE

Program Overview

The Program is designed to provide financial incentives to customers who curtail load during Company initiated events. The Program may be utilized to provide peak load reduction, contingency reserves, frequency response, and other grid services to assist with effectively managing the overall electric grid. The Program design will work with large commercial and industrial customers who have curtailable loads greater than 500 kW that can be curtailed with no advance notice or limited advance notice (7-minutes). An automated dispatch without advanced notice and a total response time within 50 seconds is considered a real-time event, and a dispatch event with an advanced notice and response within 7 minutes is considered an advanced notice event. Company representatives and its consultants will meet with large commercial and industrial customers to identify opportunities for participation. The Company and consultant will develop a site-specific demand response strategy for each participating customer and their facility.

Program Design and Customer Participation

Advance notice curtailment events will elicit participation from a broad range of large commercial and industrial customers through manual and automated curtailment. Manual curtailment requires on-site staff to take manual action at the time an event is called. For customers participating through manual curtailment, additional onsite event notification equipment such as strobe lights and/or sirens could be employed to alert staff to demand response events in addition to traditional notification methods such as email, text messages and automated phone calls. For customers that participate with some level of automation, remotely controlled relays may be installed on pieces of equipment with custom scripts for building management and/or automation systems, and remotely controlled automatic transfer switches may be installed for back-up generators or battery storage systems. Table 1 below provides a list of typical participating industries and examples of participating equipment and curtailment actions.

Table 1 – Advanced Notice Industry Participation Examples

Industry	Response Type	Example Energy Reduction Action
Colleges and Universities	Manual Curtailment	Increase the set point on central plant chiller thermostat and related air handlers
Concrete, Glass, and Building Materials	Manual Curtailment	Shut down asphalt plants.
Data Center/Server Farm	Automated	Switch on uninterruptible power supply system
Farming and Ranching	Manual Curtailment	Manually shut down the following equipment by starting time of dispatch: Extruder, HIP shut off, Oscillator, Negative Air Fan, Airlock, 150 HP Compressor, MUA units, Primary grinding
Food and Beverage Product Manufacturing and Packaging	Manual Curtailment	Manually shut down the following equipment by starting time of dispatch: Keg Line, Keg Storage Cooling Unit, Bottle Line, HVAC systems, Brewing Cellars, NH ₃ Compressors and Condenser Fan Units, Packaging Lighting, Fermenting Centrifuges, DE Filter switched to recirculation mode, Chip Washing, Grain Handling System, DCW System, Glycol System to Fermenters, and CO ₂ Collection System.
Grocery and Food Wholesalers	Automated	Shut down milling operation through building automation system
Hospitals	Automated	Automatic transfer of load to back-up generators
Waste Water and Water Treatment	Automated	Automatic transfer of load to back-up generators
Metal Manufacturing	Manual	Shut down electric arc furnace
Mining and Quarrying	Manual	Shut down crushers, lime plant, and additional processing equipment (conveyors)
Refrigerated Storage	Automated	Automatically curtail the following compressors and freezers: Comp 5 - 200hp, Comp 6 - 200hp, Comp 7 - 200hp, Comp 8 - 300hp, Comp 9 - 350hp, Comp10 - 75hp, Comp11 - 150hp, 130 ton blast freezers
Wholesale and Distributors Other	Automated	Remotely toggle CIMCO Refrigeration System to shut down

No advance notice curtailment events are typically used to manage low system frequency situations and may be dispatched as needed without advanced notice to customers. Customer's participation in the frequency program will occur through automated signals from PacifiCorp's Energy Management System to load control devices installed on customer equipment. Other technology options may include installing Under Frequency Relays ("UFR") that trips facility machinery and equipment off when the relay senses deviation in frequency below a preset level. In some cases, under frequency relays can be connected to uninterruptible power supply systems to accommodate site-level load during low frequency events. Table 2 below provides a list of typical participating industries and examples of participating equipment and curtailment actions.

Table 2 – Real-Time Industry Participation Examples

Industry	Response Type	Example Energy Reduction Action
Chemicals and Petrochemicals	Automated UFR	Air Separation Plant Liquefier breakers
Concrete, Glass, and Building Materials	Automated UFR	Feeder and crusher breakers
Farming and Ranching	Automated UFR	Main breaker for mushroom processing operation
Food and Beverage Product Manufacturing and Packaging	Automated UFR	Main distillery breaker
Mining and Quarrying	Automated UFR	Main terminal pump station (oil) breaker
Refrigerated Storage	Automated UFR	Breakers for refrigeration systems, evaporator fan motors, evaporator condensers, high side compressors, booster compressors, glycol pumps, and ultra-low temp pumps.

Incentives

Participating customers will be compensated annually based on the verifiable load that is available for dispatch throughout the year. Participation will be voluntary, and customers may also choose to opt-out of events. Customers who end their participation early or opt-out of specific events will receive a pro-rated incentive. Table 3 below includes the maximum "up to" incentive levels for participating in real-time and advanced notice events.

Table 3 – Wattsmart Business Demand Response Program Incentives

Load Management Program	Participating Equipment	Maximum incentive "up to"
Real Time Option	Commercial and Industrial Custom	\$125/kW
Advance Notice Option		
Real Time & Advance Notice Option	Commercial and Industrial Custom	\$190/kW

The initially offered amounts for real-time and advance notice individual incentives will be set at \$100/kW, and \$175/kW if customer equipment is able to participate in both options. Customer incentives are calculated based on available load (kW) during a program year and adjusted by capacity factor (percentage of year load was available) and event performance percentage. For example, if a customer had 1 MW of load on eligible equipment enrolled with a 50% capacity factor for the advance notice program and the customer participated in 75% of the called events the customer would receive a \$37,500 incentive. $((1,000 \text{ kW} \times \$100) \times 50\% \times 75\% = \$37,500)$ Program participants may have the opportunity to participate in the real-time, advance notice, or both options.

Projected Participation and Costs

The Program is forecast to achieve approximately 150 MW of curtailable demand response by 2025 and to maintain that level of participation thereafter. Table 4 below provides a breakdown of estimated Program costs by category for 2022 through 2026, and Table 5 provides a 5-year outlook of projected participation.

Table 4 – Estimated Program Costs by Category

Cost Category	2022	2023	2024	2025	2026
Program Administration	\$525,000	\$675,000	\$705,000	\$776,250	\$607,500
Customer Incentives	\$675,000	\$5,625,000	\$7,500,000	\$11,250,000	\$11,250,000
Utility Administration	\$50,000	\$75,000	\$100,000	\$100,000	\$100,000
Marketing	\$25,000	\$50,000	\$75,000	\$75,000	\$75,000
Total Program Costs	\$1,275,000	\$6,425,000	\$8,380,000	\$12,201,250	\$12,032,500

Table 5 – Estimated 5-Year Program Participation

End of Year	Estimated Customer Participation (Cumulative)	Estimated MW (Cumulative)
2022	10	30
2023	30	75
2024	50	100
2025	75	150
2026	75	150

Dispatch Parameters

The Company shall have the right to dispatch the Program based on the criteria in Table 6 below:

Table 6 – Wattsmart Business Demand Response Dispatch Parameters

Dispatch Period	Real-Time Program	Advance Notice Program
Dispatch Period	January 1 through December 31	January 1 through December 31
Available Dispatch Hours	12:00am to 11:59pm Mountain Time	12:00am to 11:59pm Mountain Time
Maximum Dispatch Hours	5 hours	60 hours
Maximum Events per year	50 events per year	25 events per year
Dispatch Days	Monday – Sunday	Monday – Sunday
Dispatch Duration	3 minutes to 7 minutes	5 minutes to 4 hours per day

COST-EFFECTIVENESS

The cost-effectiveness analysis for the Program is attached hereto as Confidential Exhibit B, and was based on the maximum “up to” incentive levels. As avoided costs are considered proprietary on load control programs, the cost-effectiveness results are provided below with a “pass” designation, which equates to a benefit to cost ratio of 1.0 or better. Due to the nature of demand response, and consistent with the cost-effectiveness methodology for other demand response programs, the Participant Cost Test is not applicable. The Program is expected to be cost-effective under the other benefit/cost tests. Sensitivity analyses are also included as Confidential Exhibits C and D. Enclosed with this filing is the Confidential Information Certificate that the Company desires parties in this docket to execute prior to obtaining access to confidential information.

Table 7 – Wattsmart Business Demand Response Program Level Cost-Effectiveness Results

Benefit/Cost Test	Benefit/Cost Ratio
PacifiCorp Total Resource Cost Test (PTRC) + Conservation Adder	Pass
Total Resource Cost Test (TRC) No Adder	Pass
Utility Cost Test (UCT)	Pass
Rate Impact Test (RIM)	Pass
Participant Cost Test (PCT)	N/A

STAKEHOLDER FEEDBACK

On March 2, 2022, the Company held a DSM Steering Committee meeting and discussed the proposed program. On March 31, 2022, the Company circulated a draft advice letter to DSM Steering Committee members for initial review, comments, and questions.

Public Service Commission of Utah

June 6, 2022

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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 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 fluid and cursive, with the first name "Michael" being more prominent than the last name "Snow".

Michael S. Snow
Manager, Regulatory Affairs

Enclosures

ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 114
STATE OF UTAH

Load Management Program

APPLICABLE: This tariff is applicable to eligible Customers who have premises located in designated areas. Customers served by the Company in the state of Utah taking service under the Company's electric service schedules listed on Schedule 193 – DSM Cost Adjustment located within the designated areas are eligible to participate in a Load Management Program (Program).

PURPOSE: To manage electric loads through a Company-dispatched Direct Load Control System (System).

PROGRAM DESCRIPTION: Detailed descriptions of Program(s) can be found on the Company website at www.wattsmart.com.

The Company shall have the right to dispatch System(s) according to the following criteria:

Load Control Program	Dispatch Period	Available Dispatch Hours	Maximum Dispatch Hours	Dispatch Days	Dispatch Duration
Cool Keeper	May 1 through September 30	2:00pm to 9:00pm Mountain Time	100 hours per Program Year	Monday through Friday, excluding holidays	Events will be limited to four hours per day
Wattsmart Batteries	January 1 through December 31	12:00am to 11:59pm Mountain Time	N/A	Monday through Sunday	Events may be held multiple times per day up to two full battery duty cycles
Wattsmart Business	January 1 through December 31	12:00am to 11:59pm Mountain Time	65 hours per Program Year	Monday through Sunday	Events will be limited to four hours per day

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.

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Issued by authority of Report and Order of the Public Service Commission of Utah in Advice No. 22-035-T09

FILED: June 6, 2022**EFFECTIVE:** July 6, 2022

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The Company shall have the right to dispatch System(s) according to the following criteria:

	Wattsmart Batteries	Cool Keeper
Dispatch Period	January 1 through December 31	May 1 through September 30
Available Dispatch Hours	12:00am to 11:59pm Mountain Time	2:00pm to 9:00pm Mountain Time
Maximum Dispatch Hours	N/A	100 hours per Program Year
Dispatch Days	Monday through Sunday	Monday through Friday, excluding holidays
Dispatch Duration	Events may be held multiple times per day up to two full battery duty cycles	Events will be limited to four hours per day

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FILED: June 6, 2022~~January 13, 2021~~
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EFFECTIVE: July 6, 2022~~January~~

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~~**CUSTOMER PARTICIPATION:** Participating premises are considered Program participants for the duration of the Program(s). Customers may cancel their participation in the Program(s) at any time. The Company or its Program contractors shall have the right to qualify program participants, at their sole discretion based on criteria the Company or Program contractors consider necessary to ensure the effective operation of the Program(s) and utility System. Program details can be viewed on the Company's website at www.rockymountainpower.net/DR.~~

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FILED: ~~June 6, 2022~~January 13, 2021
~~2022~~January 1, 2021

EFFECTIVE: July 6,

ELECTRIC SERVICE SCHEDULE NO. 114 - Continued

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Table 1 – Cool Keeper Incentives

Load Management Program	Participating Equipment	Maximum Incentive “up to”
Cool Keeper	Air Conditioners – Level 1	\$40 annually
	Air Conditioners – Level 2	\$80 annually

Table 2 – Wattsmart Batteries Incentives

Load Management Program	Participating Equipment	Maximum Incentive “up to”		
		Enrollment Incentive ¹	Annual Participation Incentive During Commitment Term ²	Annual Participation Incentive ³
Wattsmart Batteries	Residential Batteries	\$150/kW x Annual Commitment Term	\$15/kW	\$50/kW
	Commercial Batteries	\$150/kW x Annual Commitment Term	\$15/kW	\$50/kW
	Custom	Custom		

1. Enrollment Incentives are capped at 70% of battery equipment costs and available to new battery purchases only.

2. Annual Participation Incentives will be capped to not exceed monthly bill amounts.

3. Applicable to new batteries after the commitment term or existing batteries where the enrollment incentive and commitment term is not applicable. Annual Participation Incentives will be capped to not exceed monthly bill amounts.

Table 3 – Wattsmart Business Demand Response Incentives

Load Management Program	Participating Equipment Functionality	Maximum incentive “up to”
Wattsmart Business Demand Response	Real Time Dispatch	\$125/kW
	Advanced Notice Dispatch	
	Real Time and Advanced Notice Dispatch	\$190/kW

Program contractors may provide additional consideration, at no additional cost to the Company or its customers, to encourage enrollment in a Program. Such consideration may include but is not limited to gift cards or other efforts used to increase Customer interest in a Program.

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ELECTRIC SERVICE SCHEDULE NO. 114 - Continued

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	<u>Advanced Notice Dispatch</u>	
	<u>Real Time and Advanced Notice Dispatch</u>	<u>\$190/kW</u>

ELECTRIC SERVICE SCHEDULE NO. 114 - Continued

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~~**ELECTRIC SERVICE REGULATIONS:** Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.~~

(continued)

ELECTRIC SERVICE SCHEDULE NO. 114 - Continued

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Confidential

Exhibit B

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER SEPARATE
COVER**

Confidential

Exhibit C

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER SEPARATE
COVER**

Confidential

Exhibit D

**THIS ATTACHMENT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER SEPARATE
COVER**

CONFIDENTIAL INFORMATION CERTIFICATE

IN DOCKET NO. 22-035-T09

I have reviewed the Public Service Commission of Utah Rule R746-1-603 and/or the Protective Order entered by the Public Service Commission of Utah in Docket No. 22-035-T09 with respect to the review and use of confidential information and agree to comply with the terms and conditions of the rule and/or Protective Order.

Signature

Name (Type or Print)

Employer or Firm

Business Address

Party Represented

Date Signed

CERTIFICATE OF SERVICE

Docket No. 22-035-T09

I hereby certify that on June 6, 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

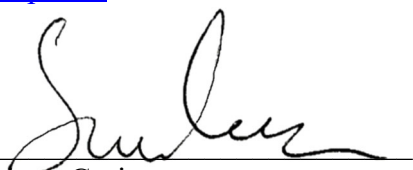
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Santiago Gutierrez
Coordinator, Regulatory Operations