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July 20, 2023

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: **Reply Comments**
In the Matter of Rocky Mountain Power's Demand-Side Management 2022 Annual
Energy Efficiency and Peak Load Reduction Report
Docket No. 23-035-26

On June 5, 2023, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment period in the above referenced matter, allowing parties to file comments on Rocky Mountain Power’s (the “Company”) 2022 Annual Energy Efficiency and Peak Load Reduction Report (“2022 Report”) by July 5, 2022, and reply comments by July 20, 2023. The Division of Public Utilities (“Division”) filed comments June 27, 2023, and the Office of Consumer Services (“Office”) filed comments July 5, 2023. The Company submits these reply comments in response to party comments.

Division Comments

The Division’s comments recommended the Commission: 1) acknowledge the 2022 Report as complying with Commission orders after the Company provides justification for programs that fail adopted cost effectiveness tests, or 2) acknowledge the 2022 Report as complying with Commission orders and re-evaluate current cost effectiveness tests to determine their future applicability.

Office Comments

The Office’s comments pointed out that the Company’s cost effectiveness for the Wattsmart Battery Program only reflected a one-year period, resulting in a “fail” designation. As a result, the Office recommended the Company file an updated Table 13 and associated cost effectiveness memo for the Wattsmart Battery Program with results including the useful life of a battery. In addition, the Office shared the Division’s cost effectiveness concerns, but was encouraged with the Company’s commitment to meet with the DSM Steering Committee later this year to discuss how best to present cost benefit results in reporting going forward.

DISCUSSION

Attached hereto as Confidential Exhibit A is an updated cost effectiveness memo for the Wattsmart Battery Program that incorporates benefits across the useful life of batteries. The updated cost

effectiveness has resulted in the Wattsmart Battery Program passing the previously failed tests, as reflected in the updated Table 13 below.

Program	Benefit/Cost Test				
	PTRC	TRC	UCT	PCT	RIM
DSM Portfolio	0.88	0.80	1.95	1.19	0.55
Energy Efficiency Portfolio	0.70	0.64	1.72	1.16	0.43
Non-Residential Energy Efficiency Portfolio	1.20	1.09	1.74	2.19	0.42
Residential Energy Efficiency Portfolio	0.46	0.41	1.90	0.66	0.48
Wattsmart Homes	0.38	0.35	1.66	0.58	0.45
Home Energy Reporting	7.63	6.94	6.94	n/a	0.64
Low Income Weatherization	22.46	20.41	2.62	n/a	0.63
Wattsmart Business	1.20	1.09	1.74	2.19	0.42
Irrigation Load Control Program	Pass	Pass	Pass	n/a	Pass
AC Load Control Program	Pass	Pass	Pass	n/a	Pass
Wattsmart Battery Program	Pass	Pass	Pass	n/a	Pass
C&I Demand Response	n/a	n/a	n/a	n/a	n/a

Additionally, as referenced in the Office’s comments, during the June 28, 2023 DSM Steering Committee meeting, the Company committed to holding discussions with Steering Committee members to re-evaluate current cost effectiveness tests and find potential solutions that may be brought forth to the Commission for consideration at a later date.

CONCLUSION

Based on the information provided herein, the Company believes it has adequately addressed concerns raised by parties and requests the Commission acknowledge the 2022 Report as complying with Commission orders.

Sincerely,



Michael S. Snow
 Manager, Regulatory Affairs

Enclosures

CONFIDENTIAL EXHIBIT A
IS CONFIDENTIAL IN ITS ENTIRETY
AND PROVIDED UNDER SEPARATE COVER

CERTIFICATE OF SERVICE

Docket No. 23-035-26

I hereby certify that on July 20, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

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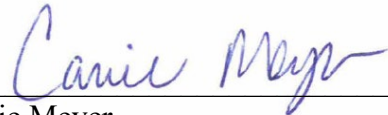
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