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## UTAH DEPARTMENT OF COMMERCE

### Division of Public Utilities

MARGARET W. BUSSE  
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## Action Request Response

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Brenda Salter, Assistant Division Director  
Abdinasir Abdulle, Utility Technical Consultant Supervisor  
Paul Hicken, Technical Consultant

**Date:** July 27, 2023

**Re:** **Docket No. 23-035-31**, Rocky Mountain Power's Semi-Annual Demand Side Management Forecast Reports.

## Recommendation (Acknowledge)

The Division of Public Utilities (DPU or Division) recommends the Public Service Commission (PSC or Commission) acknowledge the Utah Demand Side Management (DSM) Semi-Annual account analysis and forecast report, filed by Rocky Mountain Power (RMP or Company) as in compliance with the Commission order of August 9, 2009, in Docket No. 09-035-T08 approved in the Phase I stipulation.

## Issue

In compliance with the Commission Order of August 25, 2009, Docket No. 09-035-T08,<sup>1</sup> the Company filed the Utah DSM semi-annual account analysis. The Commission issued an action request to the Division on July 3, 2023, to review the filing and make recommendations to the Commission by August 4, 2023. The Commission subsequently issued a Notice of Filing and Comment Period on July 6, 2023, providing interested parties the opportunity to submit comments by August 4, 2023, with reply comments due by August 21, 2023. This memorandum is the Division's response to the Commission's Action Request and Notice of Filing and Comments Period.

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<sup>1</sup> Utah PSC, Docket No. 09-035-T08, Order Granting Approval of Phase I Stipulation, August 25, 2009.

## **Background**

On August 25, 2009, the Commission issued an Order approving the Phase I Stipulation in Docket No. 09-035-T08. The Phase I Stipulation required the Company to provide to the Commission and the DSM Advisory Group, an analysis semi-annually like the one provided by the Company in Advice No. 09-08.<sup>2</sup> The Utah Semi-Annual DSM Forecast Report and account analysis includes historical and projected monthly DSM expenditures, rate recovery and account balances; as well as historical and projected expenditures by program and Schedule 193 revenue and self-direction credits.

## **Discussion**

In the Phase I Report and Order issued December 29, 2016, the Sustainable Transportation and Energy Plan (STEP), Docket 16-035-36 capitalized and amortized Schedule 193 DSM rates beginning January 1, 2017, and created a DSM regulatory asset.<sup>3</sup> With the creation of a regulatory asset and liability, the balancing account structure was no longer accurate nor effective for the DSM reporting format. The updated reporting better reflects information on DSM expenditures and collections, regulatory assets, regulatory liabilities, and potential future thermal plant accelerated depreciation balances. Accordingly, the accounting analysis reflects actual results through May 2023 and projected results through December 2030. The Company expects the Schedule 193 surcharge rate of 3.56% to remain flat through 2024. Therefore, the Company does not currently intend to propose a mid-year rate adjustment to Schedule 193.

## **Conclusion**

The Division, based on its review of the Company's filing, concludes that the Company's Semi-Annual DSM Account Analysis and Forecast Report complies with the Commission Order of August 25, 2009, in Docket No. 09-035-T08 approving the Phase I stipulation. The Division recommends the Commission acknowledge the filing.

cc: Michael Snow, RMP.  
Michele Beck, OCS.  
Service List

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<sup>2</sup> Ibid. p.5.

<sup>3</sup> Utah PSC, Docket No. 16-035-36, Phase I Report and Order, December 29, 2016, p.3.