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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>Request of Rocky Mountain Power for Approval of its 2024 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management</p>	<p><u>Docket No. 23-035-49</u></p> <p>Comments from Utah Clean Energy</p>
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I. INTRODUCTION

Utah Clean Energy (“UCE”) appreciates the opportunity to provide comments in this docket. We recognize the importance of marketing, outreach, and communications to drive increased awareness of – and therefore greater participation in – Rocky Mountain Power’s (“RMP”) Demand-side Management (“DSM”) programs. We generally support RMP’s 2024 proposed Strategic Communication and Outreach Action Plan (“2024 Plan”), and respectfully ask the PSC approve the plan with the following recommendations. We strongly recommend including greater attention and focus around how the company plans to reach low-income and disadvantages community (“LIDAC”) members.

We respectfully submit these comments to the Commission and request that the Commission direct RMP to work with members of the DSM Steering Committee and/or individual stakeholders to incorporate these recommendations into the implementation of the 2024 Plan.

II. ANALYSIS

According to the U.S. Environmental Protection Agency, a LIDAC is any community that meets at least one of the following characteristics:

- Identified as disadvantaged by the Climate and Economic Justice Screening Tool (“CEJST”);¹
- Any census block group that is at or above the 90th percentile for any of EJScreen’s Supplemental Indexes when compared to the nation or state, and/or²²
- Any geographic area within Tribal lands as included in EJScreen

In more general terms, a LIDAC community is a community that experiences high burdens related to environmental conditions, socioeconomic status, and health, and has limited resources to address those burdens. We encourage Rocky Mountain Power to make use of the CEJST and EJScreen tool to support the development of communication and outreach strategies, as well as implementation efforts of the Wattsmart efficiency programs that effectively serves customers who are part of a LIDAC.

While many customers will be adequately served by the outreach, marketing and communication activities outlined in Rocky Mountain Power’s plan, a recent collaborative community project led by Utah Clean Energy highlighted some of the barriers which may prevent LIDAC customers from accessing the Wattsmart programs and incentives to the degree that would benefit these customers. We believe that customers who are members of LIDAC communities would be better served if Rocky Mountain Power adopted communications and outreach approaches that are tailored to meet LIDAC customers’ needs and overcome common barriers.

a. **Including LIDAC Customers in Marketing and Outreach**

Rocky Mountain Power notes that “more than half of residential customers recall communications from Rocky Mountain Power and recall the phrase ‘Wattsmart.’ However, there is no discussion of the demographics (location, income, first language, etc.) of customers that are aware of Wattsmart versus those who are not. Rocky Mountain Power also notes that “interest in energy efficiency remains high, customers first citing financial savings.”³ Since customers in LIDAC communities would benefit the most from these financial savings, UCE recommends that RMP focus marketing efforts in LIDAC communities and create equity-specific goals to ensure that these customers are being reached through Wattsmart outreach and marketing activities.

These goals should focus on increasing engagement with LIDAC customers and could be evaluated based on metrics such as tracking program participation among low-income households, westside communities, and communities identified as LIDAC using CEJST or EJScreen (see notes

¹ See: Climate and Economic Justice Screening Tool: <https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5>

² See: EPA's Environmental Justice Screening and Mapping Tool (Version 2.2) <https://ejscreen.epa.gov/mapper/>

³ Docket No. 23-035-49, Rocky Mountain Power’s Request, at 2.

1 and 2). We recommend that in early 2024, RMP convenes LIDAC community focus groups to refine and expand its overall communications strategies in a way that effectively reaches LIDAC community members/customers.

b. **Building Trust Among LIDAC Communities**

Build relationships with trusted organizations: Utah Clean Energy learned through our recent community engagement activities that it is common for LIDAC community members to experience a lack trust of utility companies. This could be rectified if the Wattsmart program established relationships with community-based organizations that are well-known and trusted in LIDAC communities (such as Westside Coalition, University Neighborhood Partners, local churches and schools, etc). We recommend that Wattsmart representatives attend community meetings and events, staff outreach booths at community events, or regularly host community outreach meetings in well-known community spaces, such as libraries, churches, and schools. Building trusted relationships takes time, so these activities should also be prioritized for subsequent communications and outreach plans.

Community energy ambassadors: While LIDAC communities may not have trust in Rocky Mountain Power, they have a lot of trust in one another. UCE heard from many community members that they would be more likely to pursue energy upgrades if they learned about those upgrades from someone in their community – such as a community leader or other well-known community member. UCE recommends that RMP utilize a portion of its communications and outreach budget to launch a “Community Energy Ambassadors” pilot program.

This program would educate and train community members about energy efficiency and the Wattsmart programs and establish a pathway for peer-to-peer communication and education. Community Energy Ambassadors could facilitate community outreach and education at in-person community events and well-known community spaces, and act as a trusted liaison between customers and energy efficiency contractors to improve the process of making energy upgrades in homes. Importantly, to build off of their existing relationships these Ambassadors should be hired from the communities in which they would work.

c. **Meaningful Community Engagement**

Marketing events: Meeting people where they’re at: On page 7 of the 2024 Plan Rocky Mountain Power outlines a sampling of marketing events that it plans to participate in during 2024. We do not believe that the sample of marketing events provided will facilitate opportunities to engage with and educate LIDAC community members/utility customers. Therefore, we strongly

recommend that this list of marketing events be expanded to include a large number of community-focused events, which are designed to reach LIDAC community members. Several events that we recommend that Rocky Mountain Power should consider attending include:

- University Neighborhood Partners ‘Partners in the Park’ summertime events
- Neighborhood council meetings
- Westside Coalition’s annual meeting, forums, and other events
- Westfest in West Valley City
- International Rescue Committee New Roots Market and other IRC events
- Community Learning Center events, such as the Glendale-Mountain View Campus Carnival

Community Energy Ambassadors would be well-suited to staff outreach tables at events like these.

Tailoring materials to engage with LIDAC communities: Utah Clean Energy also learned through our recent community engagement project that many LIDAC community members’ interests in efficiency and energy upgrades are often centered around financial savings and the potential to improve air quality. While Rocky Mountain Power currently includes themes of financial savings in its communication and outreach activities, we recommend that Rocky Mountain Power incorporate themes of improving air quality into marketing materials and at marketing events for LIDAC communities.

d. **Aligning Overarching Strategic Communications into individual the Wattsmart Programs**

Lastly, Utah Clean Energy is aware that in addition to this Strategic Communications and Outreach Plan, Rocky Mountain Power’s individual Wattsmart incentive programs (such as the Wattsmart Multifamily program, Wattsmart Homes program, and Wattsmart Business program) may be marketed independently. Customers would be best served if the company worked with its various program implementers to incorporate these recommendations into the individual programs. Some of the suggestions included here may be a better fit for the marketing plans for these individual Wattsmart programs rather than the overarching 2024 Plan. We request that RMP provide additional information about how individual Wattsmart programs are marketed and how it plans to align LIDAC-focused communications and outreach efforts across individual Wattsmart programs.

Utah Clean Energy appreciates the opportunity to share these recommendations with the Utah Public Service Commission and requests that the Commission direct RMP to work with

members of the DSM Steering Committee and/or individual stakeholders to incorporate these recommendations into the implementation of the 2024 Plan as it is implemented in 2024.

III. RECOMMENDATIONS

In sum, Utah Clean Energy respectfully recommends the Commission approve RMP's 2024 proposed Strategic Communication and Outreach Action Plan, and respectfully ask RMP take into consideration the above recommendations.

RESPECTFULLY SUBMITTED this 13th day of December, 2023,

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CERTIFICATE OF SERVICE

I hereby CERTIFY that a true and correct copy of the foregoing was e-filed and served by email this 13th day of December, 2023, as follows:

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