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Request of Rocky Mountain Power for Approval of its 2024 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management	<u>DOCKET NO. 23-035-49</u>  <u>ORDER APPROVING STRATEGIC COMMUNICATIONS AND OUTREACH PLAN FOR DEMAND SIDE MANAGEMENT PROGRAMS</u>
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ISSUED: January 18, 2024

**PROCEDURAL HISTORY**

In 2009, the Public Service Commission (PSC) authorized Rocky Mountain Power (RMP) to implement an outreach and communications program for its energy efficiency and peak management programs (the “Campaign”) for a three-year period (“2009 Order”).<sup>1</sup> Since the initial three-year period, RMP has annually filed and requested approval of strategic communications and outreach plans for demand side management (DSM) programs.

On November 7, 2023, RMP filed a request for approval of its 2024 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management, January 1, 2024 – December 31, 2024 (“2024 Plan”), effective January 1, 2024. The Division of Public Utilities (DPU), Office of Consumer Services (OCS), and Utah Clean Energy (UCE) filed comments in support of the Application on December 13, 2023 (“DPU Comments”, “OCS Comments”, and “UCE Comments”, respectively), and no other comments were received.

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<sup>1</sup>*In the Matter of the Application of PacifiCorp d/b/a Rocky Mountain Power filing for Approval of a Proposed Strategic Communications and Outreach Program for Demand Side Management, Docket No. 09-035-36, Order Approving Program with Conditions, issued June 11, 2009.*

**THE APPLICATION**

In the 2024 Plan, RMP provides a detailed action plan and proposes a budget of \$1.5 million. RMP states it included the expenses associated with the 2024 Plan in its forecast of expenses in the Annual Demand Side Management Deferred Account and Forecast Report, filed November 1, 2023 in Docket No. 23-035-31.<sup>2</sup>

The 2024 Plan includes a summary of the 2023 survey results and detailed information on proposed activities for continuing the Campaign through 2024. Based on survey results, RMP states that customers – both residential and business – are actively making changes to save energy; customers agree that RMP offers energy efficiency solutions and information but are less likely to agree that RMP offers incentives or can provide product information. Moderate recall of the Wattsmart brand was consistent across residential and business respondents. Based on these findings, RMP’s stated strategies for the 2024 campaign include:

- Continue to promote Wattsmart choices that empower customers with options to save energy and money;
- Increase targeted media channels to maintain the number of “ad aware” customers, increase its email communication, and the digital outreach program will continue in 2024, focusing on localization and personalization;

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<sup>2</sup> See *Rocky Mountain Power’s Semi-Annual Demand-Side Management (DSM) Forecast Reports*, Docket No. 23-035-31.

- Inspire the next generation of energy-savers by offering in-classroom energy efficiency education to 200 classrooms in 2024;
- Give customers the tools to manage their energy usage by offering detailed energy insight reports and information about low- and no-cost strategies, programs, and incentives; and
- Engage with customers online.

In addition, RMP states its 2024 messaging approach is intended to remind and empower customers to adopt energy-efficient behaviors and choose energy-efficient equipment to realize both the immediate impact and the long-term financial savings, as well as other operational and environmental benefits. RMP also provides insights into its continuing campaign components to create wider visibility of its programs and details how it designed the plan around wider awareness. RMP once again commits to including program evaluation and monitoring in the 2024 Plan to measure success and verify Campaign delivery. It states that success will be measured by assessing overall awareness of, and participation in, Wattsmart energy efficiency offerings and positive survey results.

### **PARTY COMMENTS AND RECOMMENDATIONS**

DPU comments RMP's proposed budget for the 2024 Plan is consistent with past plan budgets and complies with the \$1.5 million budget requirement set in the 2009 Order, and recommends the PSC approve the 2024 Plan. DPU states the 2024 Campaign is comparable to previous years with a slight increase to the Wattsmart

School Curriculum program and a slight decrease to Creative/Production/Planning programs. The budget forecasts seem to be effectively accomplishing the goals of the program.

OCS states RMP created new media content in 2023 focusing on customer success stories and this messaging will continue in 2024. OCS asserts that RMP also plans to increase its email communications with customers in 2024, focusing more on messaging personalization. All other detailed aspects of the 2024 Plan appear to generally remain the same. OCS also notes RMP added the prior year's data for comparison in its outcome reporting, which OCS commended as "a good practice in annual reporting efforts." OCS represents the 2024 Plan is reasonable and recommends the PSC approve it.

UCE generally supports and recommends approval of the 2024 Plan, making some additional recommendations. It explains there is an apparent common lack of trust among low-income and disadvantaged community ("LIDAC") members in their utility companies.<sup>3</sup> Accordingly, UCE's recommendations emphasize greater LIDAC engagement. UCE recommends the PSC direct RMP to work with members of the DSM Steering Committee or individual stakeholders to incorporate its recommendations into the implementation of the 2024 Plan.

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<sup>3</sup> UCE states it learned this through recent community engagement activities.

Generally, UCE recommends RMP: (1) include LIDAC customers in marketing and outreach; (2) build trust among LIDAC members; (3) provide meaningful community engagement, stating the 2024 Plan lacks adequate opportunities to engage with and educate LIDAC members who are utility customers; and (4) align overarching strategic communications with individual Wattsmart Programs. UCE requests 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.

**DISCUSSION, FINDINGS, AND CONCLUSIONS**

Based on the PSC's review of the 2024 Plan, DPU Comments, OCS Comments, and UCE Comments, and there being no opposition to RMP's request, we approve the 2024 Plan as filed. We find the 2024 Plan meets the \$1.5 million budget cap set forth in our 2009 Order and will reasonably further the goal of increasing awareness and participation in RMP's energy efficiency and peak reduction programs. We also find and conclude the 2024 Plan complies with the requirements described in our 2009 Order.

The PSC appreciates UCE's thoughtful recommendations. To give other parties an opportunity to respond to them, the PSC encourages further discussion of UCE's recommendations during the next scheduled DSM Steering Committee meeting, or the meeting following the next scheduled meeting.

**ORDER**

We approve RMP's 2024 Plan as filed, effective January 1, 2024. Additionally, we encourage consideration of UCE's recommendations at the next scheduled 2024 DSM Steering Committee meeting, or the meeting following the next scheduled meeting.

DATED at Salt Lake City, Utah, January 18, 2024.

/s/ David R. Clark, Commissioner

/s/ John S. Harvey, Ph.D., Commissioner

Attest:

/s/ Gary L. Widerburg  
PSC Secretary  
DW#331864

Notice of Opportunity for Agency Review or Rehearing

Pursuant to Utah Code Ann. §§ 63G-4-301 and 54-7-15, a party may seek agency review or rehearing of this written order by filing a request for review or rehearing with the PSC within 30 days after the issuance of the order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the PSC fails to grant a request for review or rehearing within 30 days after the filing of a request for review or rehearing, it is deemed denied. Judicial review of the PSC's final agency action may be obtained by filing a Petition for Review with the Utah Supreme Court within 30 days after final agency action. Any Petition for Review must comply with the requirements of Utah Code Ann. §§ 63G-4-401, 63G-4-403, and the Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on January 18, 2024, a true and correct copy of the foregoing was delivered upon the following as indicated below:

By Email:

Data Request Response Center ([datareq@pacificorp.com](mailto:datareq@pacificorp.com)), ([utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com))  
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Administrative Assistant