

October 12, 2023

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attn: Gary Widerburg  
Commission Secretary

RE: Docket No. 23-035-T10  
**Proposed Changes to Schedule 140, Non-Residential Energy Efficiency Program**

Enclosed for electronic filing are the proposed tariff sheets associated with Tariff P.S.C.U. No. 50 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 November 15, 2023, for these changes.

Third Revision of Sheet No. 140.2	Electric Service Regulation No. 140.2	Non-Residential Energy Efficiency
Third Revision of Sheet No. 140.4	Electric Service Regulation No. 140.4	Non-Residential Energy Efficiency
Second Revision of Sheet No. 140.5	Electric Service Regulation No. 140.5	Non-Residential Energy Efficiency

The purpose of this filing is to propose changes to the Non-Residential Energy Efficiency Program (“Program”) administered through Electric Service Schedule No. 140. Tariff revisions are attached hereto as Exhibit A. These tariff changes are intended to align with targets illustrated in the table below, and will be included in the Demand Side Management November 1<sup>st</sup> Deferred Account and Forecast Report on November 1, 2023, in Docket No. 23-035-31.

**2024 Budget and Savings Forecast**

***	2024 Savings Forecast	2024 Budget Forecast
Wattsmart Business	191,000 MWh	\$38,000,000

**DESCRIPTION OF CHANGES**

Proposed adjustments are listed below, with further explanation provided in subsequent sections. Note that the sections below only include offerings with proposed changes, and any current unchanged offerings are omitted from the tables and sections below.

1. Clarify limitations for Whole Building New Construction incentives; and

2. Adjust incentive offerings for Heating, Ventilation, and Air Conditioning (“HVAC”) measures.

**Whole Building New Construction (“WBNC”) Incentives**

- The “Other Limitations” column in the table on Sheet 140.2 currently indicates that refrigerated warehouses, data centers, laboratory clean rooms, supermarkets, and hospitals are not eligible. The original intent of this limitation was not to exclude these facility types from the WBNC offerings, but rather that these facilities were not subject using the Company’s preferred energy savings modeling tool. These facility types have been removed from the Other Limitations column to prevent confusion. Multifamily building types remain ineligible for the WBNC offering given there is a specific custom offering program for multifamily buildings available through the Wattsmart Homes Program in Table 6 of Schedule 111.

**Table 3a – HVAC Incentives**

- **Unitary Commercial Heat Pumps** – It is proposed to increase the maximum incentive from \$75/ton to \$300/ton, and increase the offered incentives from \$50/ton to \$120-\$300/ton based on size and whether the heat pump is an upgrade or conversion. The intent of this adjustment is to better support the evolution happening in the market toward heat pump technologies with more efficient commercial heat pumps are becoming mainstream technologies for non-residential customers.
- **Variable Refrigerant Flow (“VRF”) Heat Pumps** – It is proposed to increase the maximum incentive from \$75/ton to \$300/ton, and increase the offered incentives from \$125/ton to \$200/ton with Energy Star as a minimum eligibility requirement. These incentive increases better align with the market costs for VRF heat pumps. The current Energy Star specification for VRF heat pumps only applies to equipment with cooling capacity less than 240,000 Btu/hr. Equipment outside of the Energy Star specification greater than or equal to 240,000 Btu/hr may be eligible to receive a custom non-lighting incentive of up to \$0.15/kWh, as specified in Table 1 of Schedule 140.

**Maximum “up to” Incentives for HVAC**

Category	Current Maximum Incentive “up to”	Proposed Maximum Incentive “up to”
Unitary Commercial Heat Pumps	\$75/ton	\$300/ton
Variable Refrigerant Flow Heat Pumps	\$150/ton	\$300/ton

**Offered Incentives for HVAC**

Equipment Type	Size category	Current Offered Incentive	Proposed Offered Incentive
<b>Unitary Commercial Heat Pump Upgrade (Air-Cooled)</b>	< 65,000 Btu/hr (three phase)	\$50/ton	\$120/ton
	≥ 65,000 Btu/hr and < 240,000 Btu/hr		\$120/ton
<b>Unitary Commercial Heat Pump Conversion (Air-Cooled)</b>	< 240,000 Btu/hr	\$50/ton	\$300/ton
<b>Variable Refrigerant Flow Heat Pumps (Air-Cooled)</b>	< 240,000 Btu/hr	\$125/ton	\$200/ton
	≥ 240,000 Btu/hr	\$125/ton	See Custom Non-Lighting Incentive in Sch. 140 Table 1

**Table 3b – Other HVAC Incentives**

- **Thermostats** – It is proposed to streamline thermostat offerings under Table 3b into a single line item to enable all eligible thermostats for an incentive, including Connected Thermostats, with the maximum incentive set at \$150. Accordingly, a new line item was added to Table 3b for all Thermostats and the existing line items specific to programmable and occupancy-based thermostats were removed.

**Maximum “up to” Incentives for Other HVAC**

Category	Proposed Maximum Incentive “up to”
Thermostats	\$150

**Offered Incentives for Other HVAC**

Equipment Type	Current Offered Incentive	Proposed Offered Incentive
<b>365/366 day Programmable or Occupancy-based Thermostat</b>	\$150/thermostat	No Change
<b>Occupancy Based PTHP/PTAC control</b>	\$50/controller	No Change
<b>Connected Thermostat</b>	\$0/thermostat	\$150/thermostat

**COST-EFFECTIVENESS**

The cost effectiveness analysis for the Wattsmart Business Program is attached hereto as Exhibit B. The table below, pulled from Exhibit B, presents the expected cost effectiveness of the Program for 2024 assuming the proposed changes in this filing. Additional details and inputs are included in Exhibit B. Sensitivity analyses are also included as Exhibits C and D. The Program is expected to remain cost effective from the Utility Cost Test perspective under all scenarios.

Cost-Effectiveness Test	Levelized \$/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	0.0306	\$25,390,860	\$62,634,967	\$37,244,107	2.47
Total Resource Cost Test (TRC) No Adder	0.0680	\$56,432,942	\$62,634,967	\$6,202,025	1.11
Total Resource Cost Test (PTRC) + Conservation Adder	0.0680	\$56,432,942	\$68,898,463	\$12,465,521	1.22
Participant Cost Test (PCT)		\$54,429,055	\$98,255,920	\$43,826,865	1.81
Rate Impact Test (RIM)		\$105,786,999	\$62,634,967	-\$43,152,032	0.59
Lifecycle Revenue Impacts (\$/kWh)					\$0.0003670

### STAKEHOLDER COLLABORATION

On September 27, 2023, the Company circulated a draft of this advice letter to Steering Committee members for initial review and comment prior to submitting to the Commission for approval.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
[michael.snow@pacificorp.com](mailto: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,



Michael S. Snow  
Manager, Regulatory Affairs

Enclosures

cc: Division of Public Utilities  
Office of Consumer Services

# **Exhibit A**

**ELECTRIC SERVICE SCHEDULE NO. 140 - Continued**
**Table 1 - INCENTIVES:<sup>1</sup>**

Category	Incentive "up to"	Percent Project Cost Cap	1-Year Simple Payback Cap for Projects <sup>2</sup>	Other Limitations
Prescriptive Incentives *	See Tables 1a-11	See Tables 1a-11	See Tables 1a-11	See Tables 1a-11
Small Business Enhanced	Determined by Company with not-to-exceed amounts as shown in Table 12	Up to 90%	No	Available to all Schedule 6, 6A, and 23 customers meeting eligibility requirements. Qualifying equipment must be installed by an approved contractor/vendor
Market Incentives	Determined by Company with not-to-exceed amounts as shown in Table 13	N/A	No	Incentives available to different market actors in the supply chain, including manufacturers, distributors, contractors and end-use customers.
HVAC Check-up Incentives	Determined by Company with not-to-exceed amounts as shown in Table 14	N/A	No	Qualifying equipment must be installed by an approved contractor/vendor.
Whole Building New Construction Incentive	Determined by Company with not-to-exceed amounts as shown in Table 15	N/A	No	Building types not eligible: multifamily, <del>refrigerated warehouse, data center, laboratory, clean room, supermarket, hospital.</del>
Custom Non-Lighting Incentives for qualifying measures not on the prescriptive list. <sup>3</sup>	\$0.15 per annual kWh savings	70%	Yes	N/A
Energy Management	\$0.02 per kWh annual savings	N/A	No	N/A
Energy Project Manager Co-Funding	\$0.025 per kWh annual savings	100% of salary and eligible overhead	No	Minimum 1,000,000 kWh through qualified measures
Bill Credit <sup>4</sup>	80% of eligible project costs	80%	No	Customers with minimum 1 MW peak or annual usage of 5,000,000 kWh**

\*Incentives for measures contained in Tables 1a-11 are restricted to the amounts shown in Tables 1a-11 or the appropriate bill credit amount.

\*\*Customers may aggregate accounts to achieve minimum requirements.

<sup>1</sup> The customer or Owner may receive only one financial incentive from the Company per measure. Financial incentives include energy efficiency incentive payments, bill credits, and energy management payments. Energy Project Manager Co-Funding is available in addition to the project incentives.

<sup>2</sup> The 1 year simple payback cap means incentives will not be available to reduce the simple payback of a project below one year. If required, individual measure incentives will be adjusted downward pro-rata so the project has a simple payback after incentives of one year.

<sup>3</sup> Project Cost and 1-Year Simple Payback Caps do not apply to New Construction and Major Renovation projects that are subject to state energy code.

<sup>4</sup> To qualify for the bill credit option, a project must have a projected payback period of between 1 and 8 years. The Company may accept a project with a projected payback period in excess of eight years if project benefits satisfy the Commission's approved cost-effectiveness test. New Construction, lighting retrofits and Pre-payment projects are not eligible for bill credit.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. 23-035-T1022-035-T13

**FILED:** ~~October 12, 2023~~ ~~December~~ December 29, 2022

**EFFECTIVE:** November 15, 2023 ~~February 1, 2023~~

**ELECTRIC SERVICE SCHEDULE NO. 140 - Continued**
**Table 1a - Lighting System Retrofits**

Measure	Category		Incentive "up to"
<b>Lighting System Retrofit</b>	Interior Lighting	Prescriptive	See Market table
		Non-Prescriptive	\$1.50/W Reduced
	Exterior Lighting	Prescriptive	See Market table
		Non-Prescriptive	\$0.80/W Reduced
	Controlled Environment Agriculture		\$0.05/kWh
	Controls-Only		\$0.80/W Controlled
	Lighting Controls Commissioning		\$0.17/W Controlled
Custom		\$0.85/W Reduced	

**Table 1b – New Construction/Major Renovation Lighting Incentives**

Measure	Category	Incentive "up to"
Interior Lighting (Major Lighting Renovation Only)	Troffer	\$10/Fixture
	Linear Ambient	\$10/Fixture
	Highbay	\$20/Fixture
	Other (not listed above)	\$0.50/Fixture Wattage
	Advanced Lighting Controls	\$0.80/W controlled
Exterior Lighting (Major Lighting Renovation Only)	Advanced Lighting Controls	\$0.40/W controlled
Controlled Environment Agriculture		\$0.05/kWh

**Table 2 - Motor Incentives**

Equipment Type	Incentive "up to"
Electronically Commutated Motor	\$1/watt or \$100/horsepower based on application
Variable Frequency Drives	\$200/horsepower
Green Motor Rewinds	\$2/horsepower

**Table 3a – HVAC Incentives**

Equipment Type	Incentive "up to"
Unitary Commercial Air Conditioners	\$75/ton
Packaged Terminal Air Conditioners (PTAC)	\$25/ton
Packaged Terminal Heat Pumps (PTHP) (Heating & Cooling Mode)	\$50/ton
Unitary Commercial Heat Pumps	<del>\$300</del> \$75/ton
Heat Pump Loop	\$125/ton
Variable Refrigerant Flow Heat Pumps	<del>\$300</del> \$150/ton

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**FILED:** October 12, 2023~~December 29, 2022~~
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**ELECTRIC SERVICE SCHEDULE NO. 140 - Continued**
**Table 3b –Other HVAC Incentives**

Equipment Type	Incentive “up to”
Evaporative Cooling	\$0.06/ CFM
Indirect-Direct Evaporative Cooling (IDEC)	\$0.15/kWh annual energy savings
Chillers	\$0.15/kWh annual energy savings
<del>365/366 day Programmable or Occupancy-based Thermostat</del>	<del>\$150/thermostat</del>
<del>Occupancy Based PTHP/PTAC control</del>	<del>\$50/controller</del>
Evaporative Pre-cooler (Retrofit Only)	\$75/ton of attached cooling capacity
Advanced Rooftop Unit Control (Retrofit)	\$6,500
Advanced Rooftop Unit Control (New RTU)	\$4,500
Advanced Rooftop Unit Control (DCV Only)	\$800
<u>Thermostats</u>	<u>\$150</u>

**Table 4a – Building Envelope Incentives (Retrofit)**

Equipment Type	Incentive “up to”
Cool Roof	\$0.04/square foot
Roof/Attic Insulation	\$0.20/square foot
Wall Insulation	\$0.15/square foot
Windows	\$0.50/square foot
Window Film	\$0.15/kWh annual energy savings

**Table 4b – Building Envelope Incentives (New Construction/Major Renovation)**

Equipment Type	Incentive “up to”
Cool Roof	\$0.02/square foot
Roof/Attic Insulation	\$0.03/square foot
Wall Insulation	\$0.07/square foot
Windows	\$0.35/square foot

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 Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. 23-035-T1021-035
**FILED:** ~~October 12, 2023~~ ~~November 10, 2021~~
**EFFECTIVE:** November 15, 2023 ~~January 1, 2022~~



**ELECTRIC SERVICE SCHEDULE NO. 140 - Continued**
**Table 1 - INCENTIVES:<sup>1</sup>**

Category	Incentive "up to"	Percent Project Cost Cap	1-Year Simple Payback Cap for Projects <sup>2</sup>	Other Limitations
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Whole Building New Construction Incentive	Determined by Company with not-to-exceed amounts as shown in Table 15	N/A	No	Building types not eligible: multifamily.
Custom Non-Lighting Incentives for qualifying measures not on the prescriptive list. <sup>3</sup>	\$0.15 per annual kWh savings	70%	Yes	N/A
Energy Management	\$0.02 per kWh annual savings	N/A	No	N/A
Energy Project Manager Co-Funding	\$0.025 per kWh annual savings	100% of salary and eligible overhead	No	Minimum 1,000,000 kWh through qualified measures
Bill Credit <sup>4</sup>	80% of eligible project costs	80%	No	Customers with minimum 1 MW peak or annual usage of 5,000,000 kWh**

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<sup>4</sup> To qualify for the bill credit option, a project must have a projected payback period of between 1 and 8 years. The Company may accept a project with a projected payback period in excess of eight years if project benefits satisfy the Commission's approved cost-effectiveness test. New Construction, lighting retrofits and Pre-payment projects are not eligible for bill credit.

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	Lighting Controls Commissioning		\$0.17/W Controlled
Custom		\$0.85/W Reduced	

**Table 1b – New Construction/Major Renovation Lighting Incentives**

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	Highbay	\$20/Fixture
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	Advanced Lighting Controls	\$0.80/W controlled
Exterior Lighting (Major Lighting Renovation Only)	Advanced Lighting Controls	\$0.40/W controlled
Controlled Environment Agriculture		\$0.05/kWh

**Table 2 - Motor Incentives**

Equipment Type	Incentive "up to"
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Green Motor Rewinds	\$2/horsepower

**Table 3a – HVAC Incentives**

Equipment Type	Incentive "up to"
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Packaged Terminal Heat Pumps (PTHP) (Heating & Cooling Mode)	\$50/ton
Unitary Commercial Heat Pumps	\$300/ton
Heat Pump Loop	\$125/ton
Variable Refrigerant Flow Heat Pumps	\$300/ton

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**ELECTRIC SERVICE SCHEDULE NO. 140 - Continued**
**Table 3b –Other HVAC Incentives**

<b>Equipment Type</b>	<b>Incentive “up to”</b>
Evaporative Cooling	\$0.06/ CFM
Indirect-Direct Evaporative Cooling (IDEC)	\$0.15/kWh annual energy savings
Chillers	\$0.15/kWh annual energy savings
Evaporative Pre-cooler (Retrofit Only)	\$75/ton of attached cooling capacity
Advanced Rooftop Unit Control (Retrofit)	\$6,500
Advanced Rooftop Unit Control (New RTU)	\$4,500
Advanced Rooftop Unit Control (DCV Only)	\$800
Thermostats	\$150

**Table 4a – Building Envelope Incentives (Retrofit)**

<b>Equipment Type</b>	<b>Incentive “up to”</b>
Cool Roof	\$0.04/square foot
Roof/Attic Insulation	\$0.20/square foot
Wall Insulation	\$0.15/square foot
Windows	\$0.50/square foot
Window Film	\$0.15/kWh annual energy savings

**Table 4b – Building Envelope Incentives (New Construction/Major Renovation)**

<b>Equipment Type</b>	<b>Incentive “up to”</b>
Cool Roof	\$0.02/square foot
Roof/Attic Insulation	\$0.03/square foot
Wall Insulation	\$0.07/square foot
Windows	\$0.35/square foot

(continued)

## **Exhibit B**



## MEMORANDUM

To: Jennifer Rosenthal, Rocky Mountain Power

From: Dimitry Burdjalov, Andy Hudson, Elizabeth Applegate, Applied Energy Group

CC: Clay Monroe, Rocky Mountain Power

Date: October 6, 2023

Re: Utah Wattsmart Business Program Cost-Effectiveness Analysis, Expected Case Participation – PY2024

AEG estimated the cost-effectiveness of Rocky Mountain Power's Wattsmart Business Program in the state of Utah based on Program Year (PY) 2024 costs and savings estimates developed by implementers, checked by AEG, and confirmed by Rocky Mountain Power. This memo provides cost-effectiveness results at the program level for the base (expected participation) case. The program passes the Utility Cost Test (UCT), the Total Resource Cost Test (TRC), the PacifiCorp Total Resource Cost Test (PTRC), and the Participant Cost Test (PCT) under these conditions.

This memo provides analysis inputs and results in the following tables:

- Table 1: Cost-Effectiveness Analysis Inputs
- Table 2: Annual Program Costs by Program Year, Nominal - PY2024
- Table 3: Annual Savings in kWh by Program Year - PY2024
- Table 4: Benefit/Cost Ratios by Program Year - PY2024
- Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2024
- Table 6: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2024
- Table 7: Wattsmart Business B&I Delivery Cost-Effectiveness Results, PY2024
- Table 8: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2024



The following assumptions were utilized in the analysis:

- **Avoided Costs:** derived from PacifiCorp’s 2023 Integrated Resource Plan (IRP) Preferred Portfolio “W10 SC CETA”, converted into annual values using load shapes from the same IRP.
- **Modeling Inputs:** measure savings, costs, measure lives, incentive levels, program delivery, and portfolio costs were based on estimates developed by implementers, developed or reviewed by AEG, or provided by Rocky Mountain Power.
- **Other Economic Assumptions:** Discount rate, line loss, retail rate, and inflation rate values were provided by Rocky Mountain Power and are presented in Table 1 below.
- The following tables summarize cost-effectiveness assumptions and results for the Utah Wattsmart Business Program. Tables 2 and 3 below show the cost-effectiveness analysis inputs. Tables 4 through 7 present the cost-effectiveness results of the Wattsmart Business program for 2024. All results are presented in 2024 dollars.<sup>1</sup> Table 8 presents results at the measure category level for 2024.

Table 1: Cost-Effectiveness Analysis Inputs

Parameter	PY2024
Discount Rate	6.77%
Commercial Line Loss	5.86%
Commercial Energy Rate (\$/kWh)	\$0.081
Inflation Rate <sup>1</sup>	2.27%

Table 2: Annual Program Costs by Program Year, Nominal - PY2024

Program Year	Program Delivery	Utility Admin	Incentives	Total Utility Costs	Gross Customer Costs
2024	\$6,527,874	\$1,003,205	\$17,859,781	\$25,390,860	\$54,429,055

Table 3: Annual Savings in kWh by Program Year - PY2024

Program Year	Gross kWh Savings at Site	Realization Rate	Adjusted Gross kWh Savings at Site	Net to Gross Ratio	Net kWh Savings at Site	Measure Life
2024	95,501,477	95%	91,051,889	89%	80,892,815	15

<sup>1</sup> Future rates determined using a 2.27% annual escalator.



Table 4: Benefit/Cost Ratios by Program Year - PY2024

Program Year	UCT	TRC	PTRC	PCT	RIM
2024	2.47	1.11	1.22	1.81	0.59

Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2024

Cost-Effectiveness Test	Levelized \$/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	0.0306	\$25,390,860	\$62,634,967	\$37,244,107	2.47
Total Resource Cost Test (TRC) No Adder	0.0680	\$56,432,942	\$62,634,967	\$6,202,025	1.11
Total Resource Cost Test (PTRC) + Conservation Adder	0.0680	\$56,432,942	\$68,898,463	\$12,465,521	1.22
Participant Cost Test (PCT)		\$54,429,055	\$98,255,920	\$43,826,865	1.81
Rate Impact Test (RIM)		\$105,786,999	\$62,634,967	-\$43,152,032	0.59
Lifecycle Revenue Impacts (\$/kWh)					\$0.0003670

Table 6: Wattsmart Business Midstream Delivery Channel Cost-Effectiveness Results, PY2024

Cost-Effectiveness Test	Levelized \$/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	0.0297	\$4,291,546	\$11,419,167	\$7,127,621	2.66
Total Resource Cost Test (TRC) No Adder	0.0578	\$8,361,356	\$11,419,167	\$3,057,811	1.37
Total Resource Cost Test (PTRC) + Conservation Adder	0.0578	\$8,361,356	\$12,561,084	\$4,199,728	1.50
Participant Cost Test (PCT)		\$7,507,685	\$15,856,043	\$8,348,358	2.11
Rate Impact Test (RIM)		\$17,111,714	\$11,419,167	-\$5,692,547	0.67
Lifecycle Revenue Impacts (\$/kWh)					\$0.0000630



Table 7: Wattsmart Business B&I Delivery Channel Cost-Effectiveness Results, PY2024

<b>Cost-Effectiveness Test</b>	<b>Levelized \$/kWh</b>	<b>NPV Costs</b>	<b>NPV Benefits</b>	<b>Net Benefits</b>	<b>Benefit/Cost Ratio</b>
Utility Cost Test (UCT)	0.0303	\$19,698,598	\$47,101,224	\$27,402,627	2.39
Total Resource Cost Test (TRC) No Adder	0.0710	\$46,114,889	\$47,101,224	\$986,335	1.02
Total Resource Cost Test (PTRC) + Conservation Adder	0.0710	\$46,114,889	\$51,811,347	\$5,696,457	1.12
Participant Cost Test (PCT)		\$44,629,384	\$76,782,356	\$32,152,972	1.72
Rate Impact Test (RIM)		\$82,582,609	\$47,101,224	-\$35,481,385	0.57
Lifecycle Revenue Impacts (\$/kWh)					\$0.0002865



Table 8: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2024

Program	Measure Category	Utility Benefits (\$)	Utility Costs (\$)	Utility Cost Test	TRC Benefits (\$)	TRC Costs (\$)	TRC Test	P-TRC Benefits (\$)	P-TRC Costs (\$)	P-TRC Test	Participant PV Benefits (\$)	Participant PV Costs (\$)	PCT Test	Ratepayer PV Benefits (\$)	Ratepayer PV Costs (\$)	RIM Test
Wattsmart Business	Agriculture	\$633,530	\$228,099	2.78	\$633,530	\$444,326	1.43	\$696,883	\$444,326	1.57	\$767,418	\$533,175	1.44	\$633,530	\$838,522	0.76
Wattsmart Business	Appliance	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a
Wattsmart Business	Building Shell	\$436,339	\$89,972	4.85	\$436,339	\$85,181	5.12	\$479,972	\$85,181	5.63	\$443,803	\$53,238	8.34	\$436,339	\$480,537	0.91
Wattsmart Business	Compressed Air	\$340,964	\$84,536	4.03	\$340,964	\$95,617	3.57	\$375,060	\$95,617	3.92	\$392,769	\$66,488	5.91	\$340,964	\$421,898	0.81
Wattsmart Business	Custom	\$1,935,755	\$509,907	3.80	\$1,935,755	\$1,149,526	1.68	\$2,129,331	\$1,149,526	1.85	\$1,911,737	\$1,070,139	1.79	\$1,935,755	\$2,087,437	0.93
Wattsmart Business	Electronics	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a
Wattsmart Business	Energy Management	\$652,956	\$572,146	1.14	\$652,956	\$947,146	0.69	\$718,252	\$947,146	0.76	\$1,298,949	\$1,250,000	1.04	\$652,956	\$1,496,094	0.44
Wattsmart Business	Food Service	\$39,338	\$13,943	2.82	\$39,338	\$22,598	1.74	\$43,272	\$22,598	1.91	\$60,867	\$20,500	2.97	\$39,338	\$64,810	0.61
Wattsmart Business	HVAC	\$5,991,897	\$4,718,066	1.27	\$5,991,897	\$7,760,880	0.77	\$6,591,087	\$7,760,880	0.85	\$12,998,886	\$9,876,985	1.32	\$5,991,897	\$13,918,172	0.43
Wattsmart Business	Lighting	\$38,231,416	\$14,729,927	2.60	\$38,231,416	\$34,201,807	1.12	\$42,054,557	\$34,201,807	1.23	\$58,588,542	\$29,732,143	1.97	\$38,231,416	\$63,091,211	0.61
Wattsmart Business	Motors	\$2,919,191	\$1,082,162	2.70	\$2,919,191	\$1,107,456	2.64	\$3,211,110	\$1,107,456	2.90	\$5,586,347	\$1,403,378	3.98	\$2,919,191	\$6,048,249	0.48
Wattsmart Business	Refrigeration	\$935,019	\$279,591	3.34	\$935,019	\$607,735	1.54	\$1,028,521	\$607,735	1.69	\$1,207,541	\$561,973	2.15	\$935,019	\$1,303,881	0.72
Wattsmart Business	Water Heating	\$34,481	\$40,731	0.85	\$34,481	\$75,711	0.46	\$37,929	\$75,711	0.50	\$86,306	\$78,000	1.11	\$34,481	\$91,037	0.38
Wattsmart Business	Whole Building	\$10,127,517	\$2,885,036	3.51	\$10,127,517	\$9,726,838	1.04	\$11,140,269	\$9,726,838	1.15	\$14,198,663	\$9,644,161	1.47	\$10,127,517	\$15,149,315	0.67
Wattsmart Business	Other	\$356,565	\$156,744	2.27	\$356,565	\$208,121	1.71	\$392,221	\$208,121	1.88	\$714,091	\$138,876	5.14	\$356,565	\$795,835	0.45

# **Exhibit C**



## MEMORANDUM

To: Jennifer Rosenthal, Rocky Mountain Power

From: Dimitry Burdjalov, Andy Hudson, Elizabeth Applegate, Applied Energy Group

CC: Clay Monroe, Rocky Mountain Power

Date: October 6, 2023

Re: Utah Wattsmart Business Program Cost-Effectiveness Analysis, High Case Participation – PY2024

AEG estimated the cost-effectiveness of Rocky Mountain Power's Wattsmart Business Program in the state of Utah based on Program Year (PY) 2024 costs and savings estimates developed by implementers, checked by AEG, and confirmed by Rocky Mountain Power. This memo provides cost-effectiveness results at the program level for the high (+10% participation over base case) participation case. The program passes the Utility Cost Test (UCT), the Total Resource Cost Test (TRC), the PacifiCorp Total Resource Cost Test (PTRC), and the Participant Cost Test (PCT) under these conditions.

This memo provides analysis inputs and results in the following tables:

- Table 1: Cost-Effectiveness Analysis Inputs
- Table 2: Annual Program Costs by Program Year, Nominal - PY2024
- Table 3: Annual Savings in kWh by Program Year - PY2024
- Table 4: Benefit/Cost Ratios by Program Year - PY2024
- Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2024
- Table 6: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2024
- Table 7: Wattsmart Business B&I Delivery Cost-Effectiveness Results, PY2024
- Table 8: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2024



The following assumptions were utilized in the analysis:

- **Avoided Costs:** Avoided Costs: derived from PacifiCorp’s 2023 Integrated Resource Plan (IRP) Preferred Portfolio “W10 SC CETA”, converted into annual values using load shapes from the same IRP.
- **Modeling Inputs:** measure savings, costs, measure lives, incentive levels, program delivery, and portfolio costs were based on estimates developed by implementers, developed or reviewed by AEG, or provided by Rocky Mountain Power.
- **Other Economic Assumptions:** Discount rate, line loss, retail rate, and inflation rate values were provided by Rocky Mountain Power and are presented in Table 1 below.

The following tables summarize cost-effectiveness assumptions and results for the Utah Wattsmart Business Program. Tables 2 and 3 below show the cost-effectiveness analysis inputs. Tables 4 through 7 present the cost-effectiveness results of the Wattsmart Business program for 2024. All results are presented in 2024 dollars.<sup>1</sup> Table 8 presents results at the measure category level for 2024.

Table 1: Cost-Effectiveness Analysis Inputs

Parameter	PY2024
Discount Rate	6.77%
Commercial Line Loss	5.86%
Commercial Energy Rate (\$/kWh)	\$0.081
Inflation Rate <sup>1</sup>	2.27%

Table 2: Annual Program Costs by Program Year, Nominal - PY2024

Program Year	Program Delivery	Utility Admin	Incentives	Total Utility Costs	Gross Customer Costs
2024	\$6,527,874	\$1,003,205	\$19,645,759	\$27,176,838	\$59,871,960

Table 3: Annual Savings in kWh by Program Year - PY2024

Program Year	Gross kWh Savings at Site	Realization Rate	Adjusted Gross kWh Savings at Site	Net to Gross Ratio	Net kWh Savings at Site	Measure Life
2024	105,051,625	95%	100,157,078	89%	88,982,097	15

<sup>1</sup> Future rates determined using a 2.27% annual escalator.



Table 4: Benefit/Cost Ratios by Program Year - PY2024

Program Year	UCT	TRC	PTRC	PCT	RIM
2024	2.54	1.12	1.24	1.81	0.60

Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2024

Cost-Effectiveness Test	Levelized \$/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	0.0306	\$27,176,838	\$68,898,463	\$41,721,625	2.54
Total Resource Cost Test (TRC) No Adder	0.0680	\$61,323,128	\$68,898,463	\$7,575,335	1.12
Total Resource Cost Test (PTRC) + Conservation Adder	0.0680	\$61,323,128	\$75,788,310	\$14,465,182	1.24
Participant Cost Test (PCT)		\$59,871,960	\$108,081,512	\$48,209,551	1.81
Rate Impact Test (RIM)		\$115,612,591	\$68,898,463	-\$46,714,127	0.60
Lifecycle Revenue Impacts (\$/kWh)					\$0.0003670

Table 6: Wattsmart Business Midstream Delivery Channel Cost-Effectiveness Results, PY2024

Cost-Effectiveness Test	Levelized \$/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	0.0297	\$4,595,133	\$12,561,084	\$7,965,950	2.73
Total Resource Cost Test (TRC) No Adder	0.0578	\$9,071,924	\$12,561,084	\$3,489,159	1.38
Total Resource Cost Test (PTRC) + Conservation Adder	0.0578	\$9,071,924	\$13,817,192	\$4,745,268	1.52
Participant Cost Test (PCT)		\$8,258,453	\$17,441,648	\$9,183,194	2.11
Rate Impact Test (RIM)		\$18,697,318	\$12,561,084	-\$6,136,235	0.67
Lifecycle Revenue Impacts (\$/kWh)					\$0.0000630



Table 7: Wattsmart Business B&I Delivery Channel Cost-Effectiveness Results, PY2024

<b>Cost-Effectiveness Test</b>	<b>Levelized \$/kWh</b>	<b>NPV Costs</b>	<b>NPV Benefits</b>	<b>Net Benefits</b>	<b>Benefit/Cost Ratio</b>
Utility Cost Test (UCT)	0.0303	\$21,088,432	\$51,811,347	\$30,722,915	2.46
Total Resource Cost Test (TRC) No Adder	0.0710	\$50,146,353	\$51,811,347	\$1,664,994	1.03
Total Resource Cost Test (PTRC) + Conservation Adder	0.0710	\$50,146,353	\$56,992,481	\$6,846,128	1.14
Participant Cost Test (PCT)		\$49,092,323	\$84,460,592	\$35,368,269	1.72
Rate Impact Test (RIM)		\$90,260,845	\$51,811,347	-\$38,449,498	0.57
Lifecycle Revenue Impacts (\$/kWh)					\$0.0002865

Table 8: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2024

Program	Measure Category	Utility Benefits (\$)	Utility Costs (\$)	Utility Cost Test	TRC Benefits (\$)	TRC Costs (\$)	TRC Test	P-TRC Benefits (\$)	P-TRC Costs (\$)	P-TRC Test	Participant PV Benefits (\$)	Participant PV Costs (\$)	PCT Test	Ratepayer PV Benefits (\$)	Ratepayer PV Costs (\$)	RIM Test
Wattsmart Business	Agriculture	\$696,883	\$243,798	2.86	\$696,883	\$481,648	1.45	\$766,571	\$481,648	1.59	\$844,160	\$586,492	1.44	\$696,883	\$915,264	0.76
Wattsmart Business	Appliance	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a
Wattsmart Business	Building Shell	\$479,972	\$95,296	5.04	\$479,972	\$90,026	5.33	\$527,970	\$90,026	5.86	\$488,183	\$58,562	8.34	\$479,972	\$524,918	0.91
Wattsmart Business	Compressed Air	\$375,060	\$90,076	4.16	\$375,060	\$102,266	3.67	\$412,567	\$102,266	4.03	\$432,046	\$73,137	5.91	\$375,060	\$461,174	0.81
Wattsmart Business	Custom	\$2,129,331	\$543,328	3.92	\$2,129,331	\$1,246,909	1.71	\$2,342,264	\$1,246,909	1.88	\$2,102,911	\$1,177,152	1.79	\$2,129,331	\$2,278,611	0.93
Wattsmart Business	Electronics	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a
Wattsmart Business	Energy Management	\$718,252	\$609,646	1.18	\$718,252	\$1,022,146	0.70	\$790,077	\$1,022,146	0.77	\$1,428,844	\$1,375,000	1.04	\$718,252	\$1,625,989	0.44
Wattsmart Business	Food Service	\$43,272	\$14,943	2.90	\$43,272	\$24,463	1.77	\$47,599	\$24,463	1.95	\$66,954	\$22,550	2.97	\$43,272	\$70,897	0.61
Wattsmart Business	HVAC	\$6,591,087	\$5,097,944	1.29	\$6,591,087	\$8,445,039	0.78	\$7,250,195	\$8,445,039	0.86	\$14,298,775	\$10,864,683	1.32	\$6,591,087	\$15,218,061	0.43
Wattsmart Business	Lighting	\$42,054,557	\$15,752,652	2.67	\$42,054,557	\$37,171,721	1.13	\$46,260,013	\$37,171,721	1.24	\$64,447,397	\$32,705,357	1.97	\$42,054,557	\$68,950,065	0.61
Wattsmart Business	Motors	\$3,211,110	\$1,144,188	2.81	\$3,211,110	\$1,172,011	2.74	\$3,532,221	\$1,172,011	3.01	\$6,144,982	\$1,543,716	3.98	\$3,211,110	\$6,606,884	0.49
Wattsmart Business	Refrigeration	\$1,028,521	\$297,917	3.45	\$1,028,521	\$658,874	1.56	\$1,131,373	\$658,874	1.72	\$1,328,296	\$618,170	2.15	\$1,028,521	\$1,424,635	0.72
Wattsmart Business	Water Heating	\$37,929	\$44,331	0.86	\$37,929	\$82,809	0.46	\$41,722	\$82,809	0.50	\$94,936	\$85,800	1.11	\$37,929	\$99,668	0.38
Wattsmart Business	Whole Building	\$11,140,269	\$3,078,474	3.62	\$11,140,269	\$10,604,457	1.05	\$12,254,295	\$10,604,457	1.16	\$15,618,529	\$10,608,577	1.47	\$11,140,269	\$16,569,181	0.67
Wattsmart Business	Other	\$392,221	\$164,244	2.39	\$392,221	\$220,759	1.78	\$431,443	\$220,759	1.95	\$785,500	\$152,764	5.14	\$392,221	\$867,245	0.45

## **Exhibit D**





## MEMORANDUM

To: Jennifer Rosenthal, Rocky Mountain Power

From: Dimitry Burdjalov, Andy Hudson, Elizabeth Applegate, Applied Energy Group

CC: Clay Monroe, Rocky Mountain Power

Date: October 6, 2023

Re: Utah Wattsmart Business Program Cost-Effectiveness Analysis, Low Case Participation – PY2024

AEG estimated the cost-effectiveness of Rocky Mountain Power's Wattsmart Business Program in the state of Utah based on Program Year (PY) 2024 costs and savings estimates developed by implementers, checked by AEG, and confirmed by Rocky Mountain Power. This memo provides cost-effectiveness results at the program level for the low (-10% participation from base case) participation case. The program passes the Utility Cost Test (UCT), the Total Resource Cost Test (TRC), the PacifiCorp Total Resource Cost Test (PTRC), and the Participant Cost Test (PCT) under these conditions.

This memo provides analysis inputs and results in the following tables:

- Table 1: Cost-Effectiveness Analysis Inputs
- Table 2: Annual Program Costs by Program Year, Nominal - PY2024
- Table 3: Annual Savings in kWh by Program Year - PY2024
- Table 4: Benefit/Cost Ratios by Program Year - PY2024
- Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2024
- Table 6: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2024
- Table 7: Wattsmart Business B&I Delivery Cost-Effectiveness Results, PY2024
- Table 8: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2024



The following assumptions were utilized in the analysis:

- **Avoided Costs:** Avoided Costs: derived from PacifiCorp’s 2023 Integrated Resource Plan (IRP) Preferred Portfolio “W10 SC CETA”, converted into annual values using load shapes from the same IRP.
- **Modeling Inputs:** measure savings, costs, measure lives, incentive levels, program delivery, and portfolio costs were based on estimates developed by implementers, developed or reviewed by AEG, or provided by Rocky Mountain Power.
- **Other Economic Assumptions:** Discount rate, line loss, retail rate, and inflation rate values were provided by Rocky Mountain Power and are presented in Table 1 below.

The following tables summarize cost-effectiveness assumptions and results for the Utah Wattsmart Business Program. Tables 2 and 3 below show the cost-effectiveness analysis inputs. Tables 4 through 7 present the cost-effectiveness results of the Wattsmart Business program for 2024. All results are presented in 2024 dollars.<sup>1</sup> Table 8 presents results at the measure category level for 2024.

Table 1: Cost-Effectiveness Analysis Inputs

Parameter	PY2024
Discount Rate	6.77%
Commercial Line Loss	5.86%
Commercial Energy Rate (\$/kWh)	\$0.081
Inflation Rate <sup>1</sup>	2.27%

Table 2: Annual Program Costs by Program Year, Nominal - PY2024

Program Year	Program Delivery	Utility Admin	Incentives	Total Utility Costs	Gross Customer Costs
2024	\$6,527,874	\$1,003,205	\$16,073,803	\$23,604,882	\$48,986,149

Table 3: Annual Savings in kWh by Program Year - PY2024

Program Year	Gross kWh Savings at Site	Realization Rate	Adjusted Gross kWh Savings at Site	Net to Gross Ratio	Net kWh Savings at Site	Measure Life
2024	85,951,330	95%	81,946,700	89%	72,803,534	15

<sup>1</sup> Future rates determined using a 2.27% annual escalator.



Table 4: Benefit/Cost Ratios by Program Year - PY2024

Program Year	UCT	TRC	PTRC	PCT	RIM
2024	2.39	1.09	1.20	1.81	0.59

Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2024

Cost-Effectiveness Test	Levelized \$/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	0.0306	\$23,604,882	\$56,371,470	\$32,766,588	2.39
Total Resource Cost Test (TRC) No Adder	0.0680	\$51,542,756	\$56,371,470	\$4,828,714	1.09
Total Resource Cost Test (PTRC) + Conservation Adder	0.0680	\$51,542,756	\$62,008,617	\$10,465,861	1.20
Participant Cost Test (PCT)		\$48,986,149	\$88,430,328	\$39,444,178	1.81
Rate Impact Test (RIM)		\$95,961,407	\$56,371,470	-\$39,589,937	0.59
Lifecycle Revenue Impacts (\$/kWh)					\$0.0003670

Table 6: Wattsmart Business Midstream Delivery Channel Cost-Effectiveness Results, PY2024

Cost-Effectiveness Test	Levelized \$/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	0.0297	\$3,987,958	\$10,277,250	\$6,289,292	2.58
Total Resource Cost Test (TRC) No Adder	0.0578	\$7,650,787	\$10,277,250	\$2,626,463	1.34
Total Resource Cost Test (PTRC) + Conservation Adder	0.0578	\$7,650,787	\$11,304,975	\$3,654,188	1.48
Participant Cost Test (PCT)		\$6,756,916	\$14,270,439	\$7,513,523	2.11
Rate Impact Test (RIM)		\$15,526,110	\$10,277,250	-\$5,248,859	0.66
Lifecycle Revenue Impacts (\$/kWh)					\$0.0000630



Table 7: Wattsmart Business B&I Delivery Channel Cost-Effectiveness Results, PY2024

<b>Cost-Effectiveness Test</b>	<b>Levelized \$/kWh</b>	<b>NPV Costs</b>	<b>NPV Benefits</b>	<b>Net Benefits</b>	<b>Benefit/Cost Ratio</b>
Utility Cost Test (UCT)	0.0303	\$18,308,763	\$42,391,102	\$24,082,339	2.32
Total Resource Cost Test (TRC) No Adder	0.0710	\$42,083,426	\$42,391,102	\$307,676	1.01
Total Resource Cost Test (PTRC) + Conservation Adder	0.0710	\$42,083,426	\$46,630,212	\$4,546,786	1.11
Participant Cost Test (PCT)		\$40,166,446	\$69,104,121	\$28,937,674	1.72
Rate Impact Test (RIM)		\$74,904,374	\$42,391,102	-\$32,513,272	0.57
Lifecycle Revenue Impacts (\$/kWh)					\$0.0002865

Table 8: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2024

Program	Measure Category	Utility Benefits (\$)	Utility Costs (\$)	Utility Cost Test	TRC Benefits (\$)	TRC Costs (\$)	TRC Test	P-TRC Benefits (\$)	P-TRC Costs (\$)	P-TRC Test	Participant PV Benefits (\$)	Participant PV Costs (\$)	PCT Test	Ratepayer PV Benefits (\$)	Ratepayer PV Costs (\$)	RIM Test
Wattsmart Business	Agriculture	\$570,177	\$212,399	2.68	\$570,177	\$407,004	1.40	\$627,194	\$407,004	1.54	\$690,677	\$479,857	1.44	\$570,177	\$761,780	0.75
Wattsmart Business	Appliance	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a
Wattsmart Business	Building Shell	\$392,705	\$84,649	4.64	\$392,705	\$80,336	4.89	\$431,975	\$80,336	5.38	\$399,422	\$47,914	8.34	\$392,705	\$436,157	0.90
Wattsmart Business	Compressed Air	\$306,868	\$78,995	3.88	\$306,868	\$88,968	3.45	\$337,554	\$88,968	3.79	\$353,492	\$59,840	5.91	\$306,868	\$382,621	0.80
Wattsmart Business	Custom	\$1,742,180	\$476,486	3.66	\$1,742,180	\$1,052,144	1.66	\$1,916,398	\$1,052,144	1.82	\$1,720,563	\$963,125	1.79	\$1,742,180	\$1,896,263	0.92
Wattsmart Business	Electronics	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a	\$0	\$0	n/a
Wattsmart Business	Energy Management	\$587,661	\$534,646	1.10	\$587,661	\$872,146	0.67	\$646,427	\$872,146	0.74	\$1,169,054	\$1,125,000	1.04	\$587,661	\$1,366,200	0.43
Wattsmart Business	Food Service	\$35,404	\$12,943	2.74	\$35,404	\$20,732	1.71	\$38,945	\$20,732	1.88	\$54,780	\$18,450	2.97	\$35,404	\$58,723	0.60
Wattsmart Business	HVAC	\$5,392,707	\$4,338,188	1.24	\$5,392,707	\$7,076,721	0.76	\$5,931,978	\$7,076,721	0.84	\$11,698,998	\$8,889,286	1.32	\$5,392,707	\$12,618,284	0.43
Wattsmart Business	Lighting	\$34,408,274	\$13,707,201	2.51	\$34,408,274	\$31,231,893	1.10	\$37,849,101	\$31,231,893	1.21	\$52,729,688	\$26,758,929	1.97	\$34,408,274	\$57,232,357	0.60
Wattsmart Business	Motors	\$2,627,272	\$1,020,136	2.58	\$2,627,272	\$1,042,900	2.52	\$2,889,999	\$1,042,900	2.77	\$5,027,712	\$1,263,040	3.98	\$2,627,272	\$5,489,614	0.48
Wattsmart Business	Refrigeration	\$841,517	\$261,266	3.22	\$841,517	\$556,595	1.51	\$925,669	\$556,595	1.66	\$1,086,787	\$505,775	2.15	\$841,517	\$1,183,127	0.71
Wattsmart Business	Water Heating	\$31,033	\$37,131	0.84	\$31,033	\$68,613	0.45	\$34,136	\$68,613	0.50	\$77,675	\$70,200	1.11	\$31,033	\$82,407	0.38
Wattsmart Business	Whole Building	\$9,114,765	\$2,691,598	3.39	\$9,114,765	\$8,849,220	1.03	\$10,026,242	\$8,849,220	1.13	\$12,778,796	\$8,679,745	1.47	\$9,114,765	\$13,729,448	0.66
Wattsmart Business	Other	\$320,908	\$149,244	2.15	\$320,908	\$195,484	1.64	\$352,999	\$195,484	1.81	\$642,682	\$124,988	5.14	\$320,908	\$724,426	0.44

**CERTIFICATE OF SERVICE**

Docket No. 23-035-T10

I hereby certify that on October 12, 2023, 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](mailto:mbeck@utah.gov)  
[ocs@utah.gov](mailto:ocs@utah.gov)

**Division of Public Utilities**

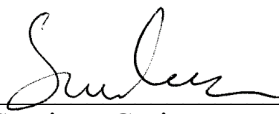
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Santiago Gutierrez  
Coordinator, Regulatory Operations