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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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| <p>ROCKY MOUNTAIN POWER'S PROPOSED CHANGES TO ELECTRIC SERVICE SCHEDULE NO. 114, LOAD MANAGEMENT PROGRAM</p> | <p>Docket No. 23-035-T11</p> <p>Utah Clean Energy's Comment in Support</p> |
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On November 14th, 2023 Rocky Mountain Power (“RMP” or the “Company”) proposed tariff revisions to Electric Service Schedule No. 114, Load Management Program.¹ The filing proposes a new Demand Side Management (“DSM”) Electric Vehicle (“EV”) Demand Response Program (the “Program”). The Company proposes the Program be administered as a 3-year pilot offering through Electric Service Schedule No. 114. Utah Clean Energy is supportive of these proposed changes and the proposed pilot offering.

As the number of EVs on Utah’s roads grows, controllable charging will become an important demand response program. This pilot Program will provide important grid services, passes all relevant cost-effectiveness tests², and will offer insight into how EVs may impact the

¹ Docket No. 23-035-T11, Rocky Mountain Power’s Redacted Tariff (Nov. 14, 2023).

² *Id.*, at 5–6, and Exhibit B.

grid.³ As the Company's Redacted Tariff filing illustrates, controllable charging can provide a number of benefits to the grid while EV adoption increases. UCE is hopeful that the information gleaned over the course of the three-year pilot will help inform successful Program design in subsequent years, as EV adoption is sure to continue growing.

With respect to marketing the Program, we recommend that the Company advertise the Program widely beyond email recruitment. We advise using a range of avenues, including advertising at dealerships, with EV advocacy groups and non-governmental organizations, and on social media. We suggest that diverse communities are included in outreach efforts, and the Company seek to reach beyond those who currently own an EV. We also recommend that the Program be closely evaluated, and that the Company provide periodic reporting to the DSM Steering Committee so that the Program can be adjusted as needed beyond the pilot period.

DATED at Salt Lake City, Utah, Nov. 29th, 2023.

Respectfully submitted,

/s/ Sarah Puzzo

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³ *Id.*, at 1.

CERTIFICATE OF SERVICE

Docket No. 23-035-T11

I hereby certify that on November 29, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

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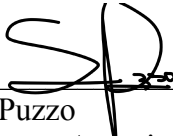
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