

April 12, 2024

***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

Attention: Gary Widerburg  
Commission Secretary

Re: **Reply Comments**  
In the Matter of the Application of Rocky Mountain Power Requesting Approval  
for Adjustments to the Irrigation Load Control Program  
Docket No. 24-035-09

On February 27, 2024, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment period in the above referenced matter, allowing parties to file comments on Rocky Mountain Power’s (the “Company”) Application Requesting Approval for Adjustments to the Irrigation Load Control Program (“Application”) by March 28, 2024, and reply comments by April 12, 2024. The Division of Public Utilities (“Division”) filed comments March 26, 2024, and the Office of Consumer Services (“Office”) filed comments March 28, 2024. The Company submits these reply comments in response to party comments.

**Division Comments**

The Division’s comments concluded the Company’s request for an order approving the continuation of the Irrigation Load Control (“ILC”) Program and the new 10-year contract with Enel X is just, reasonable, and in the public interest, and recommended the Commission approve the Company’s request with an effective date of May 1, 2024.

**Office Comments**

The Office’s comments recommended the Commission require changes to the ILC Program to go through a regulatory filing process before the Commission, in lieu of the Company making changes via website notices and communications with customers and the DSM Steering Committee.

**DISCUSSION**

The Company is agreeable to making filings before the Commission for approval of any consequential ILC Program changes going forward. This would include adjustments to incentives, dispatch parameters, dispatch event notification timeframes, and any other components of the ILC Program the DSM Steering Committee deems to be consequential. The Company will also work

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with the Office and other DSM Steering Committee members to provide more meaningful communications with Utah irrigators and stakeholders.

### **CONCLUSION**

Based on the information provided herein, the Company believes it has adequately addressed concerns raised by the Office and requests the Commission approve the Company's Application with an effective date of May 1, 2024.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is written in a cursive style and is positioned above the printed name and title.

Michael S. Snow  
Manager, Regulatory Affairs

Enclosures

**CERTIFICATE OF SERVICE**

Docket No. 24-035-09

I hereby certify that on April 12, 2024, 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**

[dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov)

**Assistant Attorney General**

Patricia Schmid [pschmid@agutah.gov](mailto:pschmid@agutah.gov)  
Robert Moore [rmoore@agutah.gov](mailto:rmoore@agutah.gov)  
Patrick Greco [pgreco@agutah.gov](mailto:pgreco@agutah.gov)

**Rocky Mountain Power**

Data Request Response Center [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
Jana Saba [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)  
[utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com)  
Michael Snow [Michael.snow@pacificorp.com](mailto:Michael.snow@pacificorp.com)



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Santiago Gutierrez  
Coordinator, Regulatory Operations