

November 1, 2024

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

Re: In the Matter of Rocky Mountain Power's Semi-Annual Demand Side Management (DSM) Forecast Reports
Docket No. 24-035-37

In its order dated August 25, 2009 in Docket No. 09-035-T08 ("Order"), the Public Service Commission of Utah ("Commission") approved the Phase I Stipulation filed August 3, 2009 in the same ("Stipulation"). As specified in the Stipulation, Rocky Mountain Power ("Company") is required to provide to the Commission and Demand Side Management ("DSM") Advisory Group¹ ("Steering Committee") by November 1st of each year a forecast of expenditures for approved programs for the next calendar year and their acquisition targets (in MWh and MW) for the next calendar year. In addition, the order issued December 21, 2011 in Docket No. 10-035-57 directed the Company to provide an estimate of the capacity and energy savings targets for approved programs in the forecast in comparison to demand-side management program targets included in the Company's most recent Integrated Resource Plan.

In the Sustainable Transportation and Energy Plan Docket No. 16-035-36, the Phase I Report and Order issued December 29, 2016 capitalized and amortized the Schedule 193 DSM rates beginning January 1, 2017, creating a DSM regulatory asset. With the creation of a DSM regulatory asset, the DSM fund ceased to be a balancing account structure. The updated DSM reporting format reflects information on DSM spend and collections, Regulatory Asset, Regulatory Liability, and potential future thermal plant accelerated depreciation balances.

Accordingly, a report containing the forecast of these items for calendar year 2025 is provided in Exhibit A, attached hereto ("November Forecast Report"). The Accounting Analysis section of the November Forecast Report reflects actual results through September 2024 and projected expenditures and revenues through December 2030. As illustrated in the Accounting Analysis, the Schedule 193 surcharge rate is estimated to increase beginning in 2025 under current assumptions. However, current assumptions will be impacted based on the conclusion of the General Rate Case in Docket No. 24-035-04. Consequently, the Company does not intend to propose an adjustment to Schedule 193 at this time. The Company discussed this issue with the DSM Steering Committee during a meeting held June 6, 2024, and the consensus among Steering Committee members was to abstain from a Schedule 193 adjustment until the conclusion of the General Rate Case. This

¹ In context of this filing, DSM Advisory Group is redefined as the DSM Steering Committee.

intent was also conveyed in the Company's DSM Forecast Report filed July 1, 2024 in Docket No. 24-035-37.

Expenditure information for individual DSM programs is provided in the DSM Expenditures section of the November Forecast Report. DSM Expenditures include actual results through September 2024, projected expenditures through December 2024, and a budget forecast for 2025. Also included in the November Forecast Report, and in compliance with the Commission's February 10, 2012 Acknowledgement Letter in Docket No. 10-035-57, is an estimate of total program participation and contribution to peak system load for the Irrigation Load Control Program. This analysis is included in the Peak Impact section of the November Forecast Report.

Additionally, as shown in the DSM Expenditures section of the November Forecast Report, total expenditures through September 2024 reflect the Wattsmart Batteries, Home Energy Reports, and Wattsmart Homes programs have exceeded 90 percent of their originally forecasted budget for the 2024 calendar year prior to December 1st.² The Company submitted a Compliance Filing concurrently with the November Forecast Report to address the budget overages for these programs.

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

By E-mail (preferred): datarequest@pacificorp.com
michael.snow@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Blvd., Suite 2000
Portland, OR 97232

Informal inquiries may be directed to me at (801) 220-4214.

Sincerely,



Michael S. Snow
Manager, Regulatory Affairs

cc: Division of Public Utilities
Office of Consumer Services

Enclosures

² Rocky Mountain Power's DSM Deferred Account and Forecast Report filed November 1, 2023, in Docket No. 23-035-31.

CERTIFICATE OF SERVICE

Docket No. 24-035-37

I hereby certify that on November 1, 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
ocs@utah.gov

Division of Public Utilities

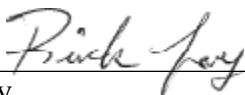
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Michael Snow michael.snow@pacificorp.com



Rick Loy
Coordinator, Regulatory Operations

Exhibit A

2025 Forecast Savings compared to Resource Plan Targets

	2025 Program Forecast		2023 Integrated Resource Plan Update	
	MWH @ Gen 2025	MW 2025	MWH 2025	MW 2025
Class 1 DSM - Residential, Commercial, Industrial				
Air Conditioner Load Control - Res. & Small Com. (Sch. 114)		320		271
Wattsmart Batteries Program (Sch. 114)		45		11
Irrigation Load Control - Industrial (Sch. 105)		14		25
C&I Load Control Program (Sch. 114)		54		43
EV Charging Demand Response (Sch. 114)		2		0.01
Total Class 1		435		349
Class 2 DSM - Residential				
Low Income Weatherization (Sch. 118)	180	0.03	N/A	N/A
Wattsmart Homes (Sch. 111)	60,481	10.52	N/A	N/A
Total Class 2 Residential	60,661	10.55	N/A	N/A
Class 2 Non-Residential Programs				
Wattsmart Business (Sch. 140)	214,130	37.24	N/A	N/A
Total Class 2 Non-Residential	214,130	37.24	N/A	N/A
Total Class 2	274,791	47.78	266,501	46.34
Total Class 2 Estimated Range	261,051 - 288,530			
Misc.				
Home Energy Reporting (Sch. N/A)	109,318	19.01		

Notes:

1. 2023 IRP Update - Preferred Integrated Portfolio ("LT_23U.LP.LLT.20.BA12.EP.MM.Integrated Portfolio + WA Additional) workpaper: Demand Response Selections includes existing, planned, and selected incremental demand response resources by customer class and technology for Utah for the year 2025, listed in cumulative MW of capacity.
2. Irrigation forecast represents highest expected realized value during the season (see "Irrigation Load Peak Impact" tab for an estimate by week throughout season).
3. Air conditioner load control (Cool Keeper) forecast represents the expected contribution/impact available at peak, temperature dependent.
4. Total Class 2 DSM: 2023 IRP Update - Preferred Integrated Portfolio ("LT_23U.LP.LLT.20.BA12.EP.MM.Integrated Portfolio + WA Additional) workpaper: "EE GWh Detail" showing energy efficiency for 2025 when accounting for 1st year annual energy efficiency shape.
5. Peak Capacity Impact (MW) divided by forecasted Class 2 DSM energy savings (MWh)

2025 Utah energy selections derived from the 2023 IRP Update Preferred Integrated Portfolio	0.000174	
Multiplied by Utah 2025 coincident peak value from the 2023 IRP	266,501	MWh
Estimated coincident peak impact of 2025 Utah Class 2 DSM programs excluding Home Energy Reports	46.34	MW
6. 2023 IRP Utah Energy Efficiency coincident peak contribution from supporting data used to create 2023 IRP Figure 6.3 page 163
7. Savings is at generation.

Accounting Analysis

DSM Spend and Collections

	2020 Full Year Total 2020	2021 Full Year Total 2021	2022 Full Year Total 2022	2023 Full Year Total 2023	2024 Full Year Total 2024	2025 Full Year Total 2025	2026 Full Year Total 2026	2027 Full Year Total 2027	2028 Full Year Total 2028	2029 Full Year Total 2029	2030 Full Year Total 2030	All Years
Program Spend	64,090,327	66,013,215	66,172,157	69,479,820	88,181,241	96,764,177	87,663,894	92,331,815	95,834,856	97,040,454	103,137,124	862,618,752
Collections	48,737,866	70,522,433	72,911,534	75,097,486	81,206,928	86,669,603	90,069,077	98,794,641	104,651,785	111,065,038	116,938,891	907,927,416
**Actuals Only-Spend Accruals Change	(839,308)	(697,307)	(874,231)	5,381,009	(5,399,565)							
Carrying Charge Rate	8.99%	8.99%	8.99%	8.99%	8.99%	8.99%	8.99%	8.99%	8.99%	8.99%	8.99%	
Estimated Surcharge Rate	3.54%	3.54%	3.54%	3.54%	3.54%	3.97%	4.39%	4.72%	4.90%	5.12%	5.33%	

Regulatory Asset

Beginning Balance	139,768,454	179,567,371	224,969,697	255,330,349	286,534,255	327,931,692	369,123,388	392,533,970	413,857,192	434,717,590	452,083,449	
Beginning Balance-Accrual		5,051,317		3,479,778	8,860,787							
Program Spend	64,090,327	66,013,215	66,172,157	69,479,820	84,757,853	96,764,177	87,663,894	92,331,815	95,834,856	97,040,454	103,137,124	859,195,364
Program Spend - Accrual	(839,308)	(697,307)	(874,231)	5,381,009	(5,399,565)							
Amortization	(18,400,788)	(24,964,895)	(31,455,548)	(38,275,913)	(46,821,640)	(55,572,480)	(64,253,313)	(71,008,593)	(74,974,457)	(79,674,595)	(83,913,288)	(570,914,721)
Carrying Charge (8.99% rate)		16,366,228	17,304,530	18,346,277	20,710,942	23,269,996	25,815,764	27,786,048	29,677,328	31,390,443	33,025,602	243,693,158
Paydown of Carrying Charge		(16,366,228)	(17,304,530)	(18,346,277)	(20,710,942)	(23,269,996)	(25,815,764)	(27,786,048)	(29,677,328)	(31,390,443)	(33,025,602)	(243,693,158)
Ending Balance	184,618,685	224,969,701	258,812,075	295,395,042	327,931,692	369,123,388	392,533,970	413,857,192	434,717,590	452,083,449	471,307,285	

Regulatory Liability

Beginning Balance	(154,075,179)	-	(29,191,311)	(53,340,819)	(71,816,115)	(85,490,462)	(93,317,588)	(93,317,588)	(93,317,588)	(93,317,588)	(93,317,588)	
Collections	(48,737,866)	(70,522,433)	(72,911,534)	(75,097,486)	(81,206,928)	(86,669,603)	(90,069,077)	(98,794,641)	(104,651,785)	(111,065,038)	(116,938,891)	(907,927,416)
Amortization	18,400,788	24,964,895	31,455,548	38,275,913	46,821,640	55,572,480	64,253,313	71,008,593	74,974,457	79,674,595	83,913,288	570,914,721
Carrying Charge (8.99% rate)	(746,049)	-	-	-	-	-	-	-	-	-	-	-
Paydown of Carrying Charge		16,366,228	17,304,530	18,346,277	20,710,942	23,269,996	25,815,764	27,786,048	29,677,328	31,390,443	33,025,602	243,693,158
Coal Accelerated Depreciation Applications	185,158,306	-	-	-	-	-	-	-	-	-	-	-
Ending Balance	-	(29,191,311)	(53,342,767)	(71,816,115)	(85,490,462)	(93,317,588)	(93,317,588)	(93,317,588)	(93,317,588)	(93,317,588)	(93,317,588)	-

Net Regulatory Asset/(Liability)

Ending Balance	184,618,685	195,778,390	205,469,308	223,578,928	242,441,230	275,805,800	299,216,382	320,539,604	341,400,002	358,765,861	377,989,697	
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Carrying Charge Calculations/Offsets

Reg Asset Carrying Charge	\$ 17,625,420	\$ 21,238,128	\$ 23,918,922	\$ 27,732,573	\$ 31,309,406	\$ 34,205,015	\$ 36,175,299	\$ 38,066,579	\$ 39,779,694	\$ 41,414,854	
Reg Liability Carrying Charge	\$ (1,259,192)	\$ (3,611,911)	\$ (5,572,645)	\$ (7,021,631)	\$ (8,039,410)	\$ (8,389,251)	\$ (8,389,251)	\$ (8,389,251)	\$ (8,389,251)	\$ (8,389,251)	\$ (8,389,251)
Net	\$ 16,366,228	\$ 17,626,218	\$ 18,346,277	\$ 20,710,942	\$ 23,269,996	\$ 25,815,764	\$ 27,786,048	\$ 29,677,328	\$ 31,390,443	\$ 33,025,602	

Accelerated Depreciation Applications

Accel Deprec Applied In Current Period? (Y/N)

G/L Balance

Coal Fund Balance

Balance per October 2018 Filing	192,000,000	229,000,000	258,000,000	282,000,000	300,000,000	310,000,000	316,000,000				
Balance per current assumptions	185,158,306	214,349,616	238,501,073	256,976,369	270,650,716	278,477,842	278,477,842				
Fund Balance Variance: Surplus/(Deficit)	(6,841,694)	(14,650,384)	(19,498,927)	(25,023,631)	(29,349,284)	(31,522,158)	(37,522,158)				

DSM Program Expenditures

	YTD Balance Sept 2024	Accrual for Sept	Total thru Sept 2024	Forecast Oct thru Dec 2024			2024 Program Year Spend		
				Oct-24	Nov-24	Dec-24	Projected 2024 Totals	Nov 1, 2023 Forecast	Jul 1, 2024 Forecast
Residential Programs									
A/C Load Control Program (Sch. 114)	\$ 7,078,251	\$ 556,200	\$ 7,634,452	\$ 150,000	\$ 534,000	\$ 150,000	\$ 8,468,452	\$ 8,801,345	\$ 9,700,000
Wattsmart Batteries Program (Sch. 114)	\$ 4,896,253		\$ 4,896,253	\$ 675,000	\$ 350,000	\$ 300,000	\$ 6,221,253	\$ 4,200,000	\$ 5,500,000
EV Charging Demand Response (Sch. 114)	\$ 64,506		\$ 64,506	\$ 3,000	\$ 3,000	\$ 9,000	\$ 79,506	\$ 162,500	\$ 162,500
Low Income (Sch. 118)	\$ 82,658		\$ 82,658	\$ 55,781	\$ 55,781	\$ 55,781	\$ 250,000	\$ 250,000	\$ 250,000
Home Energy Reports (Sch. N/A)	\$ 1,537,460		\$ 1,537,460	\$ 5,000	\$ 5,000	\$ 125,000	\$ 1,672,460	\$ 1,300,000	\$ 1,300,000
Wattsmart Homes Program (Sch. 111)	\$ 20,119,771	\$ 647,287	\$ 20,767,058	\$ 1,097,862	\$ 1,297,862	\$ 1,397,862	\$ 24,560,645	\$ 19,500,000	\$ 19,500,000
	\$ 33,778,899	\$ 1,203,487	\$ 34,982,386	\$ 1,986,643	\$ 2,245,643	\$ 2,037,643	\$ 41,252,315	\$ 34,213,845	\$ 36,412,500
Commercial & Industrial Sector Programs									
Wattsmart Business Commercial (Sch. 140)	\$ 24,607,423	\$ 1,596,370	\$ 26,203,793	\$ 2,497,345	\$ 3,545,346	\$ 3,545,347	\$ 42,486,640	\$ 39,330,636	\$ 39,330,636
Wattsmart Business Industrial (Sch. 140)	\$ 6,190,692	\$ 504,117	\$ 6,694,809						
Industrial Irrigation Load Control (Sch. N/A)	\$ 45,773		\$ 45,773	\$ 2,000	\$ 112,000	\$ 2,000	\$ 161,773	\$ 500,000	\$ 500,000
C&I Load Control Program (Sch. 114)	\$ 1,228,660		\$ 1,228,660	\$ 92,000	\$ 34,000	\$ 460,000	\$ 1,814,660	\$ 2,600,000	\$ 2,600,000
	\$ 32,072,548	\$ 2,100,487	\$ 34,173,034	\$ 2,591,345	\$ 3,691,346	\$ 4,007,347	\$ 44,463,073	\$ 42,430,636	\$ 42,430,636
Outreach and Communications									
Portfolio (TRL, DSM Central, Training)	\$ 256,776		\$ 256,776	\$ 3,300	\$ 3,300	\$ 3,300	\$ 266,676	\$ 250,000	\$ 250,000
Program Evaluation Cost - C&I	\$ 127,985		\$ 127,985	\$ 127,537	\$ 127,537	\$ 127,537	\$ 510,597	\$ 510,597	\$ 510,597
Program Evaluation Cost - Res	\$ 168,163	\$ 97,878	\$ 266,041	\$ (51,654)	\$ (51,654)	\$ (51,654)	\$ 111,080	\$ 111,080	\$ 111,080
Potential Study	\$ 62,774	\$ 21,536	\$ 84,310	\$ (2,270)	\$ (2,270)	\$ (2,270)	\$ 77,500	\$ 77,500	\$ 77,500
Total DSM Program Expenditures	\$ 67,030,709	\$ 3,423,388	\$ 70,454,097	\$ 4,967,047	\$ 6,326,048	\$ 6,434,049	\$ 88,181,241	\$ 79,093,658	\$ 81,292,313

Notes:

Jan-Sept 2024 actuals
Split for WSB program cost was based on 2024 kWh savings (76% / 24%)
Accruals added to capture full cost through Sept.

DSM Program Expenditures

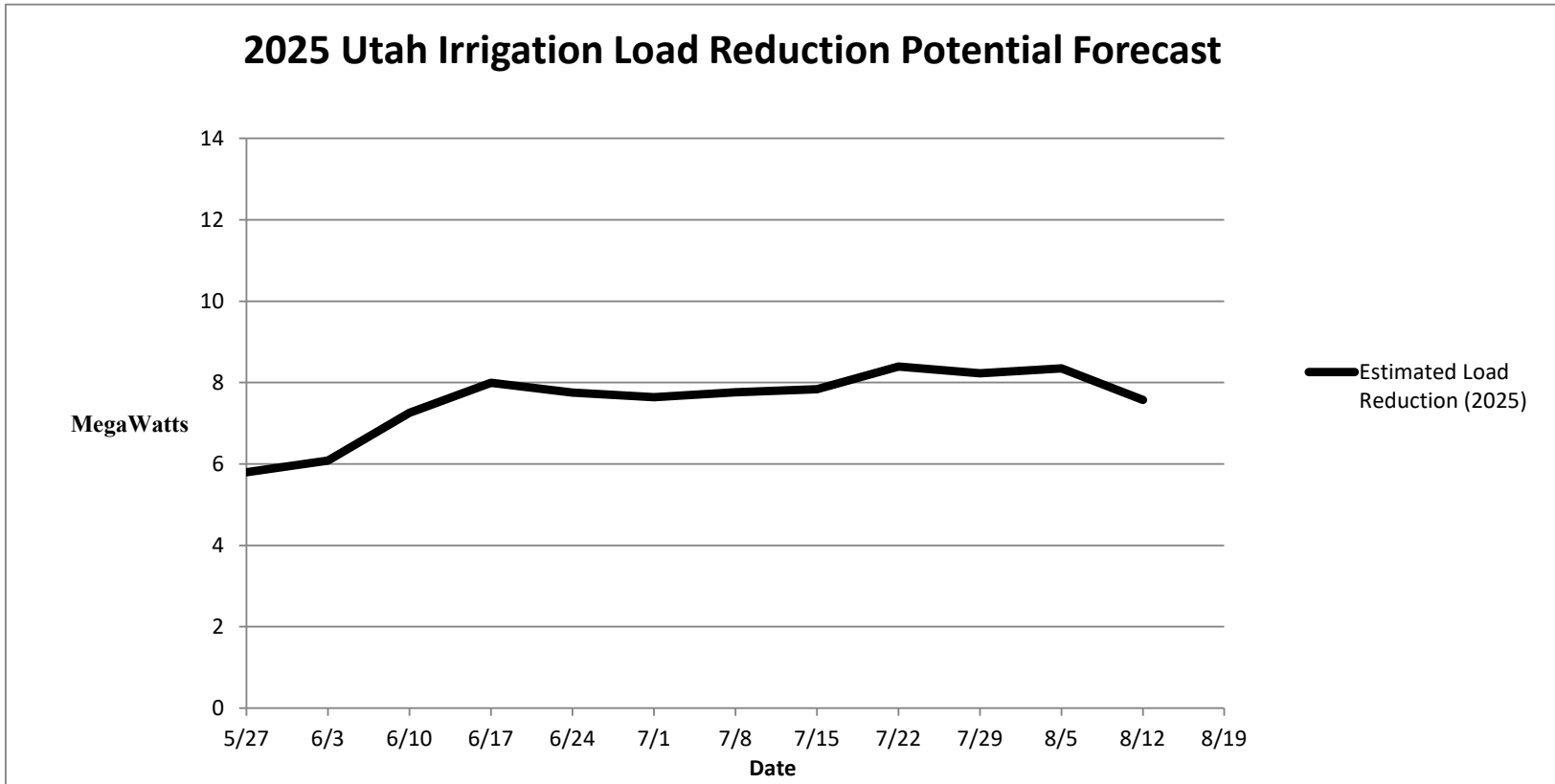
	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan - Dec 2025 Totals	2025 Budget Forecast
Residential Programs														
A/C Load Control Program (Sch. 114)	\$ 916,667	\$ 916,667	\$ 916,667	\$ 916,667	\$ 916,667	\$ 916,667	\$ 916,667	\$ 916,667	\$ 916,667	\$ 916,667	\$ 916,667	\$ 916,667	\$ 11,000,000	\$ 11,000,000
Wattsmart Batteries Program (Sch. 114)	\$ 708,333	\$ 708,333	\$ 708,333	\$ 708,333	\$ 708,333	\$ 708,333	\$ 708,333	\$ 708,333	\$ 708,333	\$ 708,333	\$ 708,333	\$ 708,333	\$ 8,500,000	\$ 8,500,000
EV Charging Demand Response (Sch. 114)	\$ 22,083	\$ 22,083	\$ 22,083	\$ 22,083	\$ 22,083	\$ 22,083	\$ 22,083	\$ 22,083	\$ 22,083	\$ 22,083	\$ 22,083	\$ 22,083	\$ 265,000	\$ 265,000
Low Income (Sch. 118)	\$ 20,833	\$ 20,833	\$ 20,833	\$ 20,833	\$ 20,833	\$ 20,833	\$ 20,833	\$ 20,833	\$ 20,833	\$ 20,833	\$ 20,833	\$ 20,833	\$ 250,000	\$ 250,000
Home Energy Reports (Sch. N/A)	\$ 141,667	\$ 141,667	\$ 141,667	\$ 141,667	\$ 141,667	\$ 141,667	\$ 141,667	\$ 141,667	\$ 141,667	\$ 141,667	\$ 141,667	\$ 141,667	\$ 1,700,000	\$ 1,700,000
Wattsmart Homes Program (Sch. 111)	\$ 1,958,333	\$ 1,958,333	\$ 1,958,333	\$ 1,958,333	\$ 1,958,333	\$ 1,958,333	\$ 1,958,333	\$ 1,958,333	\$ 1,958,333	\$ 1,958,333	\$ 1,958,333	\$ 1,958,333	\$ 23,500,000	\$ 23,500,000
	\$ 3,767,917	\$ 3,767,917	\$ 3,767,917	\$ 3,767,917	\$ 3,767,917	\$ 3,767,917	\$ 3,767,917	\$ 3,767,917	\$ 3,767,917	\$ 3,767,917	\$ 3,767,917	\$ 3,767,917	\$ 45,215,000	\$ 45,215,000
Commercial & Industrial Sector Programs														
Wattsmart Business Commercial (Sch. 140)	\$ 3,750,000	\$ 3,750,000	\$ 3,750,000	\$ 3,750,000	\$ 3,750,000	\$ 3,750,000	\$ 3,750,000	\$ 3,750,000	\$ 3,750,000	\$ 3,750,000	\$ 3,750,000	\$ 3,750,000	\$ 45,000,000	\$ 45,000,000
Wattsmart Business Industrial (Sch. 140)														
Industrial Irrigation Load Control (Sch. N/A)	\$ 41,667	\$ 41,667	\$ 41,667	\$ 41,667	\$ 41,667	\$ 41,667	\$ 41,667	\$ 41,667	\$ 41,667	\$ 41,667	\$ 41,667	\$ 41,667	\$ 500,000	\$ 500,000
C&I Load Control Program (Sch. 114)	\$ 291,667	\$ 291,667	\$ 291,667	\$ 291,667	\$ 291,667	\$ 291,667	\$ 291,667	\$ 291,667	\$ 291,667	\$ 291,667	\$ 291,667	\$ 291,667	\$ 3,500,000	\$ 3,500,000
	\$ 4,083,333	\$ 4,083,333	\$ 4,083,333	\$ 4,083,333	\$ 4,083,333	\$ 4,083,333	\$ 4,083,333	\$ 4,083,333	\$ 4,083,333	\$ 4,083,333	\$ 4,083,333	\$ 4,083,333	\$ 49,000,000	\$ 49,000,000
Outreach and Communications														
Portfolio (TRL, DSM Central, Training)	\$ 133,333	\$ 133,333	\$ 133,333	\$ 133,333	\$ 133,333	\$ 133,333	\$ 133,333	\$ 133,333	\$ 133,333	\$ 133,333	\$ 133,333	\$ 133,333	\$ 1,600,000	\$ 1,600,000
Program Evaluation Cost - C&I	\$ 42,550	\$ 42,550	\$ 42,550	\$ 42,550	\$ 42,550	\$ 42,550	\$ 42,550	\$ 42,550	\$ 42,550	\$ 42,550	\$ 42,550	\$ 42,550	\$ 510,597	\$ 510,597
Program Evaluation Cost - Res	\$ 9,257	\$ 9,257	\$ 9,257	\$ 9,257	\$ 9,257	\$ 9,257	\$ 9,257	\$ 9,257	\$ 9,257	\$ 9,257	\$ 9,257	\$ 9,257	\$ 111,080	\$ 111,080
Potential Study	\$ 6,458	\$ 6,458	\$ 6,458	\$ 6,458	\$ 6,458	\$ 6,458	\$ 6,458	\$ 6,458	\$ 6,458	\$ 6,458	\$ 6,458	\$ 6,458	\$ 77,500	\$ 77,500
Total DSM Program Expenditures	\$ 8,063,681	\$ 8,063,681	\$ 8,063,681	\$ 8,063,681	\$ 8,063,681	\$ 8,063,681	\$ 8,063,681	\$ 8,063,681	\$ 8,063,681	\$ 8,063,681	\$ 8,063,681	\$ 8,063,681	\$ 96,764,177	\$ 96,764,177

Notes:

Jan-Sept 2024 actuals
Split for WSB program cost was based on 2024 kWh savings (76% / 24%)
Accruals added to capture full cost through Sept.

Estimated Peak Impact of Irrigation Load Control By Week

Program Weeks	27-May	3-Jun	10-Jun	17-Jun	24-Jun	1-Jul	8-Jul	15-Jul	22-Jul	29-Jul	5-Aug	12-Aug
Estimated Load Reduction (2025)	6	6	7	8	8	8	8	8	8	8	8	8
Participating Load (2025)	18	18	18	18	18	18	18	18	18	18	18	18
Percent Participating Load	32%	34%	41%	45%	43%	43%	43%	44%	47%	46%	47%	42%



Note:

2025 expected impact is based on weekly load availability results for Utah's irrigation program during the 2018 - 2024 control seasons. Actual impact at peak will be dependent on when monthly peaks occur throughout the 2025 control months.