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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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| <b>In the Matter of Rocky Mountain Power’s<br/>Demand-Side Management 2024 Annual<br/>Energy Efficiency and Peak Load Reduction<br/>Report</b> | <b>DOCKET NO. 25-035-36<br/>REPLY COMMENTS FROM UTAH CLEAN ENERGY</b> |
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**I. INTRODUCTION**

On May 27, 2025, Rocky Mountain Power (hereinafter “RMP”) filed its 2024 Demand-Side Management 2024 Annual Energy Efficiency and Peak Load Reduction Report (hereinafter “Annual Report”). The Public Service Commission (hereinafter the “Commission”) issued a notice allowing interested parties to file comments on or before June 27, 2025, and reply comments on or before July 14, 2025.<sup>1</sup> Utah Clean Energy (hereinafter “UCE”) appreciates the opportunity to provide the following reply comments and recommendations.

**II. DISCUSSION**

As the Division of Public Utilities (hereinafter “DPU”) noted in their comments dated June 5, 2025, the amount of money invested in Demand-Side Management (hereinafter “DSM”) and Demand Response (hereinafter “DR”) is less than the amount of money received as net benefits, meaning that cost-effective investments in DSM and DR programs provide net benefits

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<sup>1</sup> See Docket No. 25-035-36, Rocky Mountain Power’s Demand-Side Management 2024 Annual Energy Efficiency and Peak Load Reduction Report, Notice of Filing and Comment Period (May 27, 2025), at <https://pscdocs.utah.gov/electric/25docs/2503536/3399552503536nofacp5-28-2025.pdf>.

to ratepayers UCE commends RMP for operating a cost-effective portfolio of energy efficiency and demand response programs. The cost-effectiveness for RMP's 2024 DSM portfolio was 2.67 under the Utility Cost Test, which speaks to the incredible cost effectiveness of DSM programs. We are pleased to see that RMP slightly exceeded the Integrated Resource Plan (hereinafter "IRP") DSM selection for 2024. Given DSM portfolio cost-effectiveness, UCE recommends that RMP pursue all available cost-effective DSM. In the past, the DSM allocated through the IRP was treated as the floor for DSM goals. Currently, the level of DSM selected in the IRP effectively functions as the DSM cap, even when additional cost-effective energy and/or capacity savings are available for RMP to achieve that would benefit ratepayers. By not pursuing all available cost-effective DSM, RMP leaves benefits on the table, to the detriment of customers. Achieving all cost-effective DSM will also protect rate payers against high market purchase and fuel costs, which caused the recent sharp increases in the Energy Balancing Account.

Thank you for your consideration of these comments.

DATED this 14<sup>th</sup> day of July, 2025.

Respectfully submitted,

/s/ Lauren R. Barros

Lauren Barros

**Lauren Barros Law**

*Attorney for Utah Clean Energy*

/s/ Jennifer Eden

Jennifer Eden

**Utah Clean Energy**

*Senior Associate,*

*Climate and Clean Energy*

/s/ Kevin Emerson

Kevin Emerson

**Utah Clean Energy**

*Director of Building Efficiency and  
Decarbonization*

**CERTIFICATE OF SERVICE**

**Docket No. 25-035-36**

I hereby certify that a true and correct copy of the foregoing was served by email this 14<sup>th</sup> day of July, 2025, on the following:

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