ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

1407 W. North Temple, Suite 330
Salt Lake City, UT 84116

June 26, 2025

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. 25-035-41

Dear Mr. Widerburg,

In its order from Docket No. 09-035-T08 dated August 25, 2009 ("Order"), the Public Service Commission of Utah ("Commission") approved the Phase I Stipulation agreed to by parties in the docket and filed with the Commission on August 3, 2009 ("Stipulation"). As specified in the Stipulation, Rocky Mountain Power ("Company") is required to provide to the Commission and Demand Side Management ("DSM") Advisory Group ("Steering Committee")[1] on a semi-annual basis a Utah DSM deferred account analysis similar to that originally provided by the Company in Advice No. 09-08. This analysis is to include historical and projected monthly DSM expenditures, rate recovery and account balances; as well as historical and projected monthly DSM expenditures by program, Schedule 193 revenue and self-direction credits. Additionally, as agreed to in the Stipulation and modified in the Order, in the event that expenditures for the Company's DSM programs reach 90 percent of the forecasted level prior to December 1st of the current year, the Company must notify the Steering Committee and the Commission that the 90 percent threshold has been reached. Upon notification, parties are free to take any action or seek any changes that are not inconsistent with the Stipulation that are deemed appropriate.

The Phase I Report and Order issued December 29, 2016 in the Sustainable Transportation and Energy Plan ("STEP") Docket 16-035-36 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, attached hereto as Exhibit A is an accounting analysis, reflecting actual results through May 2025 and projected results through December 2030. The Company is currently analyzing the Schedule 193 rates and intends to discuss options with the DSM Steering Committee

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

prior to proposing an adjustment. Consequently, the Company does not intend to propose a mid-year rate adjustment to Schedule 193 at this time.

Exhibit A also reflects that projected spend for the Wattsmart Battery program will exceed the original forecast for 2025 by approximately $4m.[2] The budgetary increase is due to an increase in commercial battery incentives, which are substantial. If the Wattsmart Battery program's actual spend exceeds 90 percent of the original forecast for 2025 prior to December 1st, the Company will notify the Steering Committee and the Commission in compliance with the Stipulation. The Company will also continue to monitor all program budgets and discuss them with the DSM Steering Committee in the interim.

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 St., Suite 2000 Portland, OR 97232

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

Sincerely,

Michael S. Snow
Manager, Regulatory Affairs

Enclosures

[2] DSM Forecast Report filed November 1, 2024 in Docket No. 24-035-37.

CERTIFICATE OF SERVICE

Docket No. 25-035-41

I hereby certify that on June 26, 2025, 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	
dpudatarequest@utah.gov	
Assistant Attorney General	
Patricia Schmid	pschmid@agutah.gov
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Rick Loy

Rick Loy
Coordinator, Regulatory Operations

Exhibit A

DSM Accounting Analysis	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	
	Full Year	Full Year	Full Year	Full Year	Full Year	Full Year	Full Year	Full Year	Full Year	Full Year	Full Year	
DSM Spend and Collections	Total 2020	Total 2021	Total 2022	Total 2023	Total 2024	Total 2025	Total 2026	Total 2027	Total 2028	Total 2029	Total 2030	All Years
Program Spend	**64,090,327**	**66,013,215**	**66,172,157**	**69,479,820**	**89,070,605**	**94,467,978**	**108,258,177**	**108,000,000**	**108,000,000**	**108,000,000**	**108,000,000**	925,461,951
Collections	**48,737,866**	**70,522,433**	**72,911,534**	**75,097,486**	**84,747,881**	**84,576,477**	**96,986,063**	**107,107,655**	**114,012,295**	**121,286,846**	**127,720,662**	954,969,332
Surcharge Rate	**3.54%**	**3.54%**	**3.54%**	**3.54%**	**3.54%**	**3.54%**						
Regulatory Asset												
Beginning Balance	**139,768,454**	**179,567,371**	**224,969,697**	**255,330,349**	**286,534,255**	**328,860,133**	**372,361,836**	**416,366,701**	**453,358,108**	**486,383,650**	**514,709,056**	
Program Spend	**64,090,327**	**66,013,215**	**66,172,157**	**69,479,820**	**89,070,605**	**94,467,978**	**108,258,177**	**108,000,000**	**108,000,000**	**108,000,000**	**108,000,000**	925,461,951
Amortization	**(18,400,788)**	**(24,964,895)**	**(31,455,548)**	**(38,275,913)**	**(46,744,728)**	**(55,427,470)**	**(64,253,313)**	**(71,008,593)**	**(74,974,457)**	**(79,674,595)**	**(83,913,288)**	(570,692,799)
Carrying Charge (8.99%/8.418% rate)		**16,366,228**	**17,304,530**	**18,346,277**	**20,640,679**	**26,853,195**	**32,732,750**	**36,099,062**	**39,037,838**	**41,612,251**	**43,807,373**	292,800,183
Paydown of Carrying Charge		**(16,366,228)**	**(17,304,530)**	**(18,346,277)**	**(20,640,679)**	**(26,853,195)**	**(32,732,750)**	**(36,099,062)**	**(39,037,838)**	**(41,612,251)**	**(43,807,373)**	(292,800,183)
Ending Balance	**184,618,685**	**224,969,701**	**258,812,075**	**295,395,042**	**333,466,996**	**367,900,641**	**416,366,701**	**453,358,108**	**486,383,650**	**514,709,056**	**538,795,767**	
Regulatory Liability												
Beginning Balance	**(154,075,179)**	**-**	**(29,191,311)**	**(53,340,819)**	**(71,816,115)**	**(89,178,589)**	**(4,883,504)**	**(4,883,504)**	**(4,883,504)**	**(4,883,504)**	**(4,883,504)**	
Collections	**(48,737,866)**	**(70,522,433)**	**(72,911,534)**	**(75,097,486)**	**(84,747,881)**	**(84,576,477)**	**(96,986,063)**	**(107,107,655)**	**(114,012,295)**	**(121,286,846)**	**(127,720,662)**	(954,969,332)
Amortization	**18,400,788**	**24,964,895**	**31,455,548**	**38,275,913**	**46,744,728**	**55,427,470**	**64,253,313**	**71,008,593**	**74,974,457**	**79,674,595**	**83,913,288**	570,692,799
Carrying Charge (8.99%/8.418% rates)	**(746,049)**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	
Paydown of Carrying Charge		**16,366,228**	**17,304,530**	**18,346,277**	**20,640,679**	**26,853,195**	**32,732,750**	**36,099,062**	**39,037,838**	**41,612,251**	**43,807,373**	292,800,183
Coal Accelerated Depreciation Applications	**185,158,306**	**-**	**-**	**-**	**-**	**86,590,897**	**-**	**-**	**-**	**-**	**-**	86,590,897
Ending Balance	**-**	**(29,191,311)**	**(53,342,767)**	**(71,816,115)**	**(89,178,589)**	**(4,883,504)**	**(4,883,504)**	**(4,883,504)**	**(4,883,504)**	**(4,883,504)**	**(4,883,504)**	
Net Regulatory Asset/(Liability)												
Ending Balance	**184,618,685**	**195,778,390**	**205,469,308**	**223,578,928**	**244,288,407**	**363,017,137**	**411,483,197**	**448,474,604**	**481,500,147**	**509,825,552**	**533,912,263**	
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	274,338,843	276,634,655	276,634,655					
Fund Balance Variance: Surplus/(Deficit)	(6,841,694)	(14,650,384)	(19,498,927)	(25,023,631)	(25,661,157)	(33,365,345)	(39,365,345)					

DSM Program Expenditures

	YTD Balance May 2025	Accrual for May 2025	Total thru May 2025	Forecast June thru Dec 2025 Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Projected 2025 Totals as of May '25	Nov 1, 2024 Forecast for 2025	2026 Budget Forecast
Residential Programs													
A/C Load Control Program (Sch. 114)	$3,226,649	$323,100	$3,549,749	$1,064,322	$1,064,322	$1,064,322	$1,064,322	$1,064,322	$1,064,322	$1,064,322	$ 11,000,000	$ 11,000,000	$ 12,000,000
Wattsmart Batteries Program (Sch. 114)	$2,954,293		$2,954,293	$1,363,672	$1,363,672	$1,363,672	$1,363,672	$1,363,672	$1,363,672	$1,363,672	$ 12,500,000	$ 8,500,000	$ 15,000,000
EV Charging Demand Response (Sch. 114)	$84,549		$84,549	$25,779	$25,779	$25,779	$25,779	$25,779	$25,779	$25,779	$ 265,000	$ 265,000	$ 440,000
Low Income (Sch. 118)	$36,260		$36,260	$30,534	$30,534	$30,534	$30,534	$30,534	$30,534	$30,534	$ 250,000	$ 250,000	$ 250,000
Home Energy Reports (Sch. N/A)	$792,868		$792,868	$129,590	$129,590	$129,590	$129,590	$129,590	$129,590	$129,590	$ 1,700,000	$ 1,700,000	$ 2,000,000
wattsmart Homes Program (Sch. 111)	$9,366,831	$465,917	$9,832,748	$2,176,036	$2,176,036	$2,176,036	$2,176,036	$2,176,036	$2,176,036	$2,176,036	$ 25,065,000	$ 23,500,000	$ 25,000,000
	$16,461,450	$789,017	$17,250,467	$4,789,933	$4,789,933	$4,789,933	$4,789,933	$4,789,933	$4,789,933	$4,789,933	$ 50,780,000	$ 45,215,000	54,690,000
Commercial & Industrial Sector Programs													
wattsmart Business Commercial (Sch. 140)	$10,319,472	$2,744,211	$13,063,683	$3,609,332	$3,609,332	$3,609,332	$3,609,332	$3,609,332	$3,609,332	$3,609,332	$ 42,500,000	$ 45,000,000	$ 42,000,000
wattsmart Business Industrial (Sch. 140)	$3,304,403	$866,593	$4,170,996										
Industrial Irrigation Load Control (Sch. 105)	$3,010		$3,010	$70,999	$70,999	$70,999	$70,999	$70,999	$70,999	$70,999	$ 500,000	$ 500,000	$ 500,000
C&I Load Control Program (Sch. 114)	$1,521,770		$1,521,770	$154,033	$154,033	$154,033	$154,033	$154,033	$154,033	$154,033	$ 2,600,000	$ 3,500,000	$ 8,520,000
	$15,148,655	$3,610,805	$18,759,460	$3,834,363	$3,834,363	$3,834,363	$3,834,363	$3,834,363	$3,834,363	$3,834,363	$ 45,600,000	$ 49,000,000	$ 51,020,000
Outreach and Communications	$280,612		$280,612	$188,484	$188,484	$188,484	$188,484	$188,484	$188,484	$188,484	$ 1,600,000	$ 1,600,000	$ 1,600,000
Portfolio (TRL, DSM Central, Training)	$37,397	$21,760	$59,157	$27,263	$27,263	$27,263	$27,263	$27,263	$27,263	$27,263	$ 250,000	$ 250,000	$ 250,000
Program Evaluation Cost - C&I	$50,147	$0	$50,147	$65,779	$65,779	$65,779	$65,779	$65,779	$65,779	$65,779	$ 510,597	$ 510,597	$ 510,597
Program Evaluation Cost - Res	$2,427	$32,077	$34,503	$10,940	$10,940	$10,940	$10,940	$10,940	$10,940	$10,940	$ 111,080	$ 111,080	$ 111,080
Potential Study	$41,838	$7,538	$49,376	$4,018	$4,018	$4,018	$4,018	$4,018	$4,018	$4,018	$ 77,500	$ 77,500	$ 77,500
Total DSM Program Expenditures	$ 32,022,525	$ 4,461,196	$ 36,483,721	$ 8,920,779	$ 8,920,779	$ 8,920,779	$ 8,920,779	$ 8,920,779	$ 8,920,779	$ 8,920,779	$ 98,929,177	$ 96,764,177	$ 108,259,177

Notes:
Jan-May 2025 actuals
Split for WSB program cost was based on 2024 kWh savings (76% / 24%)
Bill credits are included in WSB program cost
Accruals added to capture full cost through Ma
2026 Forecast Estimate was based on 2025 forecast