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MARGARET W. BUSSE  
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CHRIS PARKER  
*Division Director*

## Action Request Response

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Brenda Salter, Assistant Director  
Abdinasir Abdulle, Utility Technical Consultant Supervisor  
David Fields, Utility Analyst  
Savannah Torman, Utility Analyst

**Date:** December 17, 2025

**Re:** **Docket No. 25-035-63**, Request of Rocky Mountain Power for Approval of its 2026 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management

## Recommendation (Approval With Conditions)

The Division of Public Utilities (DPU or Division) recommends that the Public Service Commission (PSC or Commission) approve Rocky Mountain Power's (Company) 2026 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management (2026 Plan). However, given the analysis henceforth, the Division questions portions of the program and recommends that the Commission do the following: require the Company to provide the value/cost of using Escalent to conduct third-party surveys, require the Company to provide a comprehensive presentation to its Steering Committee about its Time of Use Program.

## Issue

On November 25, 2025, the Company filed with the Commission its 2026 Plan. The Commission issued an Action Request to the Division on November 26, 2025, to review the filing and make recommendations to the Commission. In addition, the Commission issued a Notice of Filing and Comment Period on November 28, 2025, requesting interested parties



submit comments by December 26, 2025. This memorandum is the Division's response to the Commission's Action Request and Notice of Filing and Comment Period.

## **Background**

In Docket No. 09-035-36, the Commission issued an Order approving the implementation of an outreach and communications program in Utah for the Company's energy efficiency and peak management programs (Campaign) for a period of three years. The intent of the Campaign was to increase awareness and participation in the Company's energy efficiency and peak reduction programs. Since that time, the Company has sought and received approval from the Commission for outreach and communications plans on an annual basis in a separate docket from its DSM Budget application.

The Company proposes a \$1.63 million budget for 2026, and the expenses associated with the 2026 Plan were included in the Company's forecast of expenses in the DSM Forecast Report filed on October 31, 2025, in Docket No. 25-035-41. The Company requests an order approving the 2026 Plan with an effective date of January 1, 2026.

## **Discussion**

In 2025, Rocky Mountain Power contracted with Escalent, Inc. to conduct customer satisfaction surveys regarding the Home Energy Savings program. About 68% of residential customers and 69% of business customers surveyed recalled seeing communication on energy efficiency from the Company. Interest in energy efficiency and financial savings remains high and, of the customers surveyed, they continue to look to the Company as a credible source of energy efficiency information.

The annual surveys conducted by Escalent indicate that the Home Energy Savings programs received residential customer satisfaction ratings of 8.8/10 consistently throughout 2025. Additionally, 89% of customers surveyed felt energy conservation programs were important, and 53% of customers surveyed reported changes to their actions to reduce energy consumption. Customers reported that their main reason for reducing energy use is to save money, consistent with every year since inception of the surveys.

Likewise, the Wattsmart Business program received high customer satisfaction ratings of 9.3/10 for 2025. About 93% of business customers surveyed believe it is important for utility companies to offer energy conservation programs, and 83% believe it is important to offer demand response programs. In the past year, about 37% of business customers report making changes to save energy.

Notably, the Company reports receiving 2,274 survey responses. In 2024, the Company reported having 1,056,000 total customers in Utah;<sup>1</sup> therefore, the survey responses reflect only 0.02% of the total customer base in Utah. Escalent surveys do not measure net energy savings, cost-effectiveness of the program, or the program's success in reducing peak energy demand.<sup>2</sup> It appears that Escalent surveys only measure customers' satisfaction with the program, rather than evaluating the efficacy of the program itself. The Company does not report on the cost of using this third-party evaluator, and the Division questions whether this cost may be more prudent if it were allocated elsewhere in the program, or in this instance, eliminated altogether.

Based on the 2026 Plan filed by Rocky Mountain Power, the following is an explanation of the programs and strategies planned for the 2026 calendar year:

### ***Residential Programs (Wattsmart Homes)***

The 2026 strategy for residential customers is centered on sustaining a high level of awareness while concurrently engaging previously untapped demographics and prior program participants.

- **Omni-Channel Approach:** The Company will use a mix of digital media, social media, radio, TV, and print to drive traffic to online engagement platforms like wattsmart.com.
- **Home Shows:** Rocky Mountain Power plans a strong presence at the Spring and Fall Home Shows in the Salt Lake City metro area to engage customers one-on-one.
- **Retargeting:** The program will target customers who have already received rebates to introduce them to additional opportunities for energy reduction.

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<sup>1</sup> 2024 Utah Energy Efficiency and Peak Reduction Annual Report, Docket No. 25-035-36 at 3.

<sup>2</sup> Residential Utility Trusted Brand & Customer Engagement, Escalent (last visited Dec. 10, 2025) <https://landing.escalent.co/utility-trusted-brand-and-customer-engagement-residential>

- **Customer Energy Insights:** The Company will continue to provide reports to residential customers offering detailed insights into their energy usage and suggesting low-cost strategies for efficiency.

### ***Business Programs (Wattsmart Business)***

The 2026 plan is designed to emphasize the strategic significance of energy efficiency regarding business operations and financial results.

- **Advocacy and Storytelling:** The campaign will highlight successful customer stories to demonstrate how Wattsmart offerings help lower costs and improve operations.
- **Events and Sponsorships:** The Company plans to participate in various business events, including vendor training, the Utah Green Business Awards, and the Utah Manufacturers Association annual event.
- **Energy Analyzer:** A specific focus will be placed on promoting the benefits of the Wattsmart Business energy analyzer tool.

### ***School Curriculum Program***

The Company will continue its "Be Wattsmart, Begin at Home" program, which has been in place since 2012.

- **Target:** The program targets fourth-grade students in 200 Utah schools.
- **Format:** The program utilizes one-hour interactive assemblies, delivered by the National Energy Foundation, which include hands-on activities and energetic videos.
- **Incentives:** Students are asked to audit their homes using a "Home Energy Checklist" to receive LED night lights, and teachers can receive a \$50 gift card for their classrooms.

### ***Community and Inclusivity Initiatives***

- **Low Income and Disadvantaged Communities (LIDAC):** The Company is expanding in-language services, including Spanish versions of collateral and creating pilot marketing strategies to better reach underserved communities. They intend to work with multicultural marketing partners to engage these audiences authentically.

- **Time of Use (TOU) Education:** Outreach will focus on educating customers about how shifting energy usage to off-peak hours supports grid reliability and lowers costs.

**Budget Allocation**

The total proposed budget for the 2026 Plan is \$1.63 million. The specific breakdown is as follows in Table 1:

**Table 1: 2026 Forecasted Communications Disaggregated Budget**

Media	\$650,000
Wattsmart School Curriculum Program	\$300,000
Customer Energy Insights Reports	\$200,000
Creative/Production/Planning	\$199,000
Low income and disadvantage community outreach	\$100,000
Wattsmart Business events and sponsorships	\$90,000
General PR and public affairs support	\$32,000
Time Of Use Education and Outreach	\$30,000
Research	\$29,000
<b>Total</b>	<b>\$1,630,000</b>

The proposed budget for 2026 of \$1.63 million is slightly higher than the \$1.6 million from previous Campaign budgets, with the increase due primarily to the new addition of \$30,000 to the Time of Use Education and Outreach strategy.

**Conclusion**

Upon thorough review and detailed analysis of the Company's recent filing—the proposed 2026 Strategic Communications and Outreach Plan for Demand-Side Management (DSM)—the Division has concluded that the Plan generally adheres to the established requirements and directives set forth in the Commission’s Order in Docket No. 09-035-36. The Plan is found to be compliant with the core mandate of the Order, which necessitates the proactive and robust promotion of the Company's portfolio of energy saving programs.

The Division observes that the proposed strategies are effective in encouraging wider customer engagement with the DSM programs through a diverse and multi-faceted

approach, employing various media campaigns. The plan utilizes a combination of digital, print, and community outreach initiatives intended to optimize message dissemination throughout the Company's service territory.

It is important to note that while the Plan is deemed acceptable, the Division recommends that the Commission direct the DSM Steering Committee to review the following in its next quarterly meeting:

- The continued use of the Escalent satisfaction surveys,
- A comprehensive presentation regarding the specific design, implementation, and anticipated results of the Time of Use Education and Outreach program.

cc: Michael Snow, Rocky Mountain Power  
Michele Beck, Office of Consumer Services