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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>Request of Rocky Mountain Power for Approval of its 2026 Strategic Communications and Outreach Action Plan for Demand Side Management</p>	<p><u>Docket No. 25-035-63</u> Comments from Utah Clean Energy</p>
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I. INTRODUCTION

Utah Clean Energy (“UCE”) appreciates the opportunity to provide comments in this docket. We recognize the importance of marketing, outreach, and communications to drive increased awareness of – and therefore greater participation in – Rocky Mountain Power’s (“RMP”) Demand-Side Management (“DSM”) programs and are appreciative that this outreach will again include a focus on low-income and disadvantaged communities in 2026. We generally support RMP’s 2026 proposed Strategic Communication and Outreach Action Plan (“2026 Plan”), and respectfully ask the PSC approve the plan with the following recommendations. We strongly recommend that Rocky Mountain Power’s low-income and disadvantaged community outreach focus on building reciprocal community partnerships and conducting meaningful community engagement, and that the outcomes of this outreach be measured against appropriate targets.

We respectfully submit these comments to the Commission and request that the Commission direct RMP to work with members of the DSM Steering Committee and/or external stakeholders to incorporate these recommendations into the implementation of the 2026 Plan.

II. ANALYSIS

A LIDAC is a community that experiences high burdens related to utility costs, environmental conditions, socioeconomic status, and health, and has limited resources to address those burdens. We encourage Rocky Mountain Power and its marketing partner(s) to make use of the CEJST¹ and EJScreen² tools to support the development of communication and outreach

¹ See <https://climateprogramportal.org/resource/climate-and-economic-justice-screening-tool-cejst/>

² See <https://pedp-ejscreen.azurewebsites.net/>

strategies, and implementation of the Wattsmart energy efficiency programs to reach LIDAC customers.

In UCE's community engagement work over the past several years, community members from LIDACs have expressed little familiarity with Wattsmart programs, indicating that they may not be reached by traditional marketing efforts. It is crucial that Wattsmart programs be marketed to all of Rocky Mountain Power's customers, especially those who need to reduce their energy costs the most. We believe that these LIDAC customers could be better served by strategies that prioritize building community partnerships and meaningful community engagement.

a. **Building Community Partnerships and Funding**

Building lasting partnerships with community-based organizations and building trust with LIDACs are important components of effectively distributing information about Wattsmart programs among LIDACs. Based on conversations with DSM Steering Committee members, UCE is aware that Rocky Mountain Power has been collaborating with Avisa Multicultural Marketing and plans to build additional community partnerships to reach LIDACs and provide education regarding Wattsmart program opportunities. Building relationships with well-known and trusted community partners is an important first step towards reaching all customers, and UCE is appreciative that Rocky Mountain Power plans to continue to dedicate time and resources to this work.

In order to build reciprocal partnerships that benefit both RMP and community partners, UCE recommends that a portion of the \$100,000 allocated for LIDAC outreach be used to provide financial support to community-based organizations (for example, providing stipends to community-based partners). This support would allow community organizations to dedicate staff time and resources to supporting RMP's Wattsmart outreach.³ In addition, it would be a best practice for Rocky Mountain Power Wattsmart program staff to support community partners' capacity to reach their own goals through a portion of the approved budget. This may include relationship-building, attending community-based events, and providing additional support as needed. UCE also requests that a more detailed explanation of how RMP plans to allocate the \$100,000 designated for LIDAC outreach be provided in an updated version of this plan and in future DSM Steering Committee meetings.

b. **Meaningful Community Engagement**

While UCE recognizes the importance of Wattsmart participating in the commercial and industrial events listed on page 8 of the Plan, we strongly recommend that RMP include events that are community-facing and LIDAC focused in its 2026 Plan. The importance of Wattsmart program staff being present at in-person community-based events is an essential complement to

³ See: Fostering Partnerships for Community Engagement <https://www.urban.org/sites/default/files/2024-03/Fostering%20Partnerships%20for%20Community%20Engagement.pdf>

marketing and outreach activities. Connecting with LIDAC customers in familiar and convenient locations is widely recognized as a best practice for LIDAC engagement ⁴ and its value cannot be overstated.

UCE requests that RMP update the marketing event table in the plan with at least 3 events whose primary audience is RMP LIDAC customers, and share an updated version of this plan in this docket and in a future DSM Steering Committee meeting.

Below, UCE provides a sample of community-based events and organizations that host community-based events in the Wasatch Front. These events are all free and well-attended by community members, and we strongly recommend that RMP expand their community event list to include these and other similar events. This is not an exhaustive list; LIDAC outreach should include communities throughout Utah.

Event name	Timing	Audience	Description
Partners in the Park (University Neighborhood Partners)	Summer	Westside residents	This series of tabling events brings together community organizations and westside residents in local neighborhood parks. These events occur approximately every 2 weeks in the summer and are well-attended. ⁵
Rose Park Community Street Festival	Summer	Rose Park residents	The street festival includes community organizations as well as local artists and performers. Tabling opportunities are available for organizations that serve community members. ⁶
Community Council meetings	Varies	Varies	Many communities in Salt Lake City, including Westside neighborhoods, have Community Councils which meet regularly. These councils are comprised of elected community members and meetings are open for residents to attend. There may be opportunities to table or give a brief presentation about Wattsmart.
Chambers of Commerce	Varies	Varies	Chambers of Commerce can be an excellent way to reach small businesses and other commercial customers. Some Chambers of Commerce focus on diverse business owners, such as the Utah Hispanic Chamber of Commerce and the Utah Pacific Islander Chamber. There are also Chambers that are based in LIDACs, such as ChamberWest.

⁴ See: Fostering Partnerships for Community Engagement <https://www.urban.org/sites/default/files/2024-03/Fostering%20Partnerships%20for%20Community%20Engagement.pdf>

⁵ See: Partners in the Park <https://www.partners.utah.edu/partners-in-the-park/>

⁶ See: Rose Park Community Council <https://roseparkcommunitycouncil.org/>

Community Learning Centers	Summer	Students and their families	Community Learning Centers, such as those in Glendale and Rose Park, build on the core instructional program of a school by adding educational and life skill enrichment for the entire family and removing barriers to learning by providing necessary social services. CLCs host classes and events with tabling opportunities for organizations that serve students and families. There may be tabling opportunities at events or an opportunity to organize a presentation to student families. ⁷
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c. Targets

Both the 2025 and 2026 Plans discussed that the performance of a pilot marketing strategy focused on LIDACs would be measured against “targets.” Based on conversations with Rocky Mountain Power, UCE understands that these targets have not yet been identified. We recommend that targets focus on building community relationships and establishing trust (rather than a measure of energy savings). Potential targets could include number of partnerships built (especially those with funding provided to partners), community events attended, and community members educated. UCE also requests that the topic of targets be revisited during the Q1 2026 DSM Steering Committee meetings as progress is made on identifying these targets and tracking progress towards them.

d. Integrating LIDAC Engagement into Other Marketing Strategies

In addition to the \$100,000 budgeted specifically for LIDAC outreach, there are opportunities to integrate LIDAC engagement into other Wattsmart campaign components. For instance, the "Be Wattsmart, Begin at Home" program should also integrate LIDAC engagement by making it possible for more Title 1 schools to receive access to the program. As Utah Clean Energy discussed in our comments in 2024, we recommend that 40% of “Be Wattsmart, Begin at Home” program slots be reserved for Title 1 schools to more effectively serve LIDAC students and families.

⁷ See: Glendale-Mountain View Community Learning Center <https://www.slcschools.org/schools/glendale-mountain-view-community-learning-center>, Rose Park Community Learning Center <https://www.slcschools.org/schools/rose-park-community-learning-center>

e. **Aligning Overarching Strategic Communications Across Individual Wattsmart Programs**

Lastly, Utah Clean Energy is aware that in addition to the 2026 Plan, Rocky Mountain Power's individual Wattsmart incentive programs (such as the Wattsmart Multifamily program, Wattsmart Homes program, and Wattsmart Business program) may be marketed independently. Customers would be best served if the company worked with its various program implementers to incorporate these recommendations into the individual programs. Some of the suggestions included here may be a better fit for the marketing plans for these individual Wattsmart programs rather than the overarching 2026 Plan. We request that RMP provide additional information about how individual Wattsmart programs plan to align LIDAC-focused communications and outreach efforts into their programs and present these details at the Q2 2026 DSM Steering Committee.

Utah Clean Energy appreciates the opportunity to share these recommendations with the Utah Public Service Commission and requests that the Commission direct RMP to work with members of the DSM Steering Committee and/or individual stakeholders to incorporate these recommendations into the implementation of the 2026 Plan as it is implemented in 202.

III. RECOMMENDATIONS

In sum, Utah Clean Energy respectfully recommends the Commission approve RMP's 2026 proposed Strategic Communication and Outreach Action Plan and respectfully ask RMP take into consideration the above recommendations.

RESPECTFULLY SUBMITTED this 19th day of December, 2025,

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CERTIFICATE OF SERVICE

I hereby CERTIFY that a true and correct copy of the foregoing was e-filed and served by email this this 19th day of December, 2025, as follows:

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