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Office of Consumer Services

UTAH DEPARTMENT OF COMMERCE

MARGARET W. BUSSE
Executive Director

MICHELE BECK
Director

To: The Public Service Commission of Utah
From: The Office of Consumer Services
Michele Beck, Director
Alex Ware, Utility Analyst
Asami Kobayashi, Utility Analyst

Date: December 26, 2025

Subject: Docket 25-035-63

In the Matter of: Request of Rocky Mountain Power for Approval of its 2026 Strategic Communications and Outreach Action Plan and Budget for Demand Side Management

INTRODUCTION

On November 25, 2025, Rocky Mountain Power (“RMP or Company”) filed with the Public Service Commission of Utah (“PSC”) a request for approval of its 2025 Demand Side Management (“DSM”) Communications and Outreach plan and budget (“Plan”). On November 28, 2025, the PSC issued a Notice of Filing and Comment Period establishing that interested parties may submit comments on RMP’s filing on or before December 26, 2025. The Office of Consumer Services (“OCS”) provides the following comments on the filing pursuant to that schedule.

BACKGROUND

The purpose of RMP’s communications and outreach plan is to increase awareness of and participation in the Company’s energy efficiency and peak load reduction programs. Following the PSC order issued on June 11, 2009 in Docket No. 09-035-36, RMP files its Plan with the PSC annually.

OCS REVIEW OF THE 2026 COMMUNICATIONS AND OUTREACH PLAN

In its filing, RMP presents a 2026 Plan budget of \$1.63 million, which is an increase of \$30,000 from the 2025 Plan. The expenses associated with the Plan were included in RMP’s DSM forecast report pending approval before the PSC in Docket No. 25-035-41.

On page 2 of its application, RMP presents the following table containing the breakdown of the Plan budget into its operational areas for 2026:

2026 Forecasted Budget (January 2026 – December 2026)

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

Budget Adjustments

RMP’s 2026 DSM communications budget forecast includes a new line item for Time-of-Use (“ToU”) Education and Outreach with a budget of \$30,000. This addition is the result of collaborative workgroup meetings with stakeholders in 2025 that discussed revisions to a Residential ToU Pilot program. According to the Company, these funds would be used to support outreach efforts to help customers understand how shifting energy use to off-peak hours could lower costs and support grid reliability. The OCS notes that, while the amount allocated to this effort is small relative to the total budget, it is unclear how these funds would be used, aside from the Company stating that outreach strategies “will include clear, accessible messaging.” We referred back to a workgroup meeting presentation from September 24, 2025 and slide 11 listed a more comprehensive list of methods RMP proposes for ToU education efforts – such as webpage updates, mail an email, bill inserts, social media, and other examples. In the future, we recommend this budget filing include a more thorough explanation of how the budget will be utilized. It is also unclear how the success of this targeted outreach program would be measured and what its goals are. As such, the OCS recommends that RMP provide details on what it plans for the TOU Education and Outreach, including the methods used to reach residential ratepayers and how outcomes will be evaluated.

Additionally, while the \$100,000 budget for Low Income and Disadvantaged Community (LIDAC) Outreach remains since being included in the 2025 Plan, it is unclear what the outcomes were from allocating funds for this purpose. The OCS notes that the 2026 strategy for engaging LIDAC customers is identical to the 2025 strategy, and there appears to be no update on its progress or outcomes from including funds for this effort in the 2025 budget. Based on the current narrative for the LIDAC Outreach, it appears that RMP continues to consider its efforts to engage LIDAC customers as exploratory or

in development – even after utilizing these funds last program year. As such, the OCS recommends that RMP provide a detailed update on its LIDAC Outreach, outlining its goals, methods, and outcomes thus far.

The 2026 budget also includes minor adjustments, such as a \$9,870 decrease for the Creative/Production/Planning line item and a \$9,870 increase for the Wattsmart School Curriculum Program.

Survey Outcomes

RMP also reports in this filing that it contracted with a third party to conduct customer surveys to measure the levels of awareness of the Company's DSM programs and self-reported efforts toward energy conservation. A total of 2,274 residential surveys were completed in 2025 and, although RMP has not reported how many business customer surveys were completed this time, the Company reports the following findings from the surveys:

- *Program Satisfaction.* Similar to prior years, residential customers are generally satisfied with the Home Energy Savings Program, giving it a score of 8.8/10. Similarly, business customers score the Wattsmart Business Program at 9.3/10.
- *Awareness of Energy Efficiency Communication.* Similar to prior years, RMP reports 68% of its residential customers and 69% of its business customers recall seeing communication from the Company in the prior six months. The OCS is encouraged to see that this metric has been increasing over time, from 59% in 2022 among business customers.
- *Importance of Energy Conservation.* RMP reports customer opinions regarding the importance of energy conservation efforts remain high. 89% of residential customers believe conservation programs are important, while 93% of business customers indicate the same. Customers report that the primary reason to reduce energy use is to save money.
- *Action Taken by Customers.* The OCS observes that, over the last 4 years, both residential and business customers have reported that they “made changes in the past year to save energy” at decreasing rates. The percentage of residential customers indicating these changes has dropped from 59% in 2022 to 53% in 2025. Similarly, business customers have indicated changes to save energy from 48% in 2022 to 37% in 2025.

In terms of forward-looking strategy, RMP states it will continue to advertise and promote Wattsmart program offerings to customers as ways to save energy and money. The only difference in strategy compared to the previous year is that the Company will now be conducting ToU Education and Outreach to residential ratepayers. All other aspects of the Plan appear to generally remain the same for 2026.

RECOMMENDATION

Overall, the OCS finds RMP's 2025 Strategic Communications and Outreach Plan continues to be reasonable and recommends PSC approval. However, the OCS also recommends that RMP provide further details on its measurable goals, methods, and quantifiable outcomes/expected outcomes for the TOU Education and LIDAC outreach efforts, as well as for any new budget changes on a going-forward basis. RMP should provide clear justifications for its budget adjustments to fully explain the rationale behind program investments.

cc:

Jana Saba, Rocky Mountain Power

Michael Snow, Rocky Mountain Power

datarequest@pacificorp.com

Chris Parker, Division of Public Utilities