ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

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

June 11, 2025

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attn: Gary Widerburg
Commission Secretary

RE: Proposed Changes to Schedule 140, Non-Residential Energy Efficiency Program
Docket No. 25-035-T07

Enclosed for electronic filing are the proposed tariff sheets associated with Tariff P.S.C.U. No. 52 of PacifiCorp, d.b.a. Rocky Mountain Power (the "Company"), applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405-2(D), the Company states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Company respectfully requests an effective date of July 11, 2025 for these changes.

First Revision of Sheet No. 140.2	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.4	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.5	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.8	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.9	Schedule 140	Non-Residential Energy Efficiency

The purpose of this filing is to propose changes to the Non-Residential Energy Efficiency Program ("Program") administered through Electric Service Schedule No. 140. These tariff changes are intended to align with the targets illustrated in the table below, filed in the Demand Side Management November 1st Deferred Account and Forecast Report on November 1, 2024, in Docket No. 24-035-37.

2025 Budget and Savings Forecast

***	2025 Savings Forecast	2025 Budget Forecast
Wattsmart Business	214,130 MWh	$45,000,000

DESCRIPTION OF CHANGES

A brief description and proposed adjustments are listed below, with further explanation provided in subsequent sections. Note that the sections below only include offerings with proposed changes, and current unchanged offerings are generally omitted from the tables and sections below.

1. Restructure lighting offerings to better align with actual energy savings.
2. Discontinue Green Motor Rewinds and clarify eligible categories for HVAC and Building Envelope measures.

3. Expand the Small Business Enhanced program to include medium-sized customers, rename the program to Small and Medium Business Express, and restructure program offerings to focus more on lighting controls.
4. Shift market incentives to distributors to better influence stocking practices.
5. Adjust Whole Building construction phase incentives to distinguish between all-electric HVAC vs. other HVAC systems and add a new offering for Green Building Certification.

Table 1 - INCENTIVES

- **Prescriptive Incentives** – modify the table references under the 'Percent Project Cost Cap' and '1-Year Simple Payback Cap for Projects' columns to reference incentive lists on the Company's website in lieu of Tables 1a-11.
- **Small Business Enhanced** –
    - As further described below, the Small Business Enhanced offering is being renamed to Small and Medium Business Express.
    - Modify the customer eligibility requirements from eligibility based on customers' rate schedules (Schedule 6, 6A, or 23) to eligibility based on consolidated customer usage data. The referenced lookup site views the overall customer kilowatt (kW) and kilowatt-hour (kWh) usage in order to have a more holistic view and more precisely target small and medium customers.

Table 1a – Lighting System Retrofits

- **Prescriptive Offerings (Interior/Exterior) –**
    - **Lamp Replacements** – Replacement lamp measures have historically been offered through Tables 1a and 13a to maximize participation. Going forward, it is proposed to shift lamp replacements to only be offered through the midstream channel in Table 13a. This shift is intended to better focus on and influence distributor stocking practices and increase market adoption. Distributors who receive incentives may pass through the savings to customers with bought down products.
    - **Fixture/Kit Retrofits –** Existing fixture/kit retrofit measures will still be offered through Table 1a, however it is proposed that these offerings going forward be based on a $/Watt Installed methodology in lieu of a $/fixture. This shift will help to align incentives more closely with actual energy savings. The maximum incentive for interior and exterior retrofits under this new structure will be $3.50 and $1.20 per Watt Installed, respectively. Offered incentives for new interior and exterior fixtures/kits without controls will be $0.75 and $1.20 per watt installed, respectively.
        - **Plug and Play Controls Ready (Interior)** – It is proposed to add a plug-and-play controls-ready fixture tier to interior lighting prescriptive offerings. Controls-ready fixtures enable streamlined, cost effective integration of advanced networked controls. The initially offered incentive for this new offering will be $1.00/Watt Installed.
        - **Networked Lighting / Luminaire Level Lighting Controls (Interior)** – Networked Lighting Controls ("NLCs") and Luminaire Level Lighting

Controls ("LLLCs") are currently offered through the non-prescriptive path. It is proposed to add NLCs and LLLCs to the prescriptive path to streamline applications and reduce the burden on customers. The offered incentives for the prescriptive path of these measures will be $1.25 and $1.75 per watt installed, respectively.

Maximum "up to" Incentives for Lighting System Retrofits

Measure	Category		Current Incentive "up to"	Proposed Incentive "up to"
Lighting System Retrofit	Interior Lighting	Prescriptive	See Market table	$3.50/ W Installed
	Exterior Lighting	Prescriptive	See Market table	$1.20/ W Installed

Offered Incentives for Prescriptive Lighting System Retrofits

Category	Sub-Category	Currently Offered Incentive (Per lamp, fixture, kit)		Proposed Offered Incentive	
		Interior	Exterior	Interior	Exterior
Reflector Lamps	MR-16	$1.00		$0.00 / Discontinued	
Pin-Based Lamps	PLC < 10W	$1.25			
	PLC ≥ 10 W	$2.50			
	PLL Lamp	$3.00			
TLED Linear Replacement Lamps	Type A/B Dual Mode	$2.00			
	Type A with Driver	$4.00			
	Type B	$1.50			
	Type C	$3.50			
	Type C with available Continuous Dimming	$4.50			
HID Replacement Lamps	< 40 W	$10.00			
	≥ 40 W and < 70 W	$12.00			
	≥ 70 W and < 140 W	$35.00			
	≥ 140 W	$50.00			
Wall Pack Fixtures	> 20 W and < 75 W	$20.00			
	≥ 75 W	$25.00			
Troffer Kit/Fixture	--	$18.00			
Linear Ambient Kit/Fixture	--	$9.50			
New Fixture or Retrofit Kit	No Controls	N/A		$0.75/W Installed	$1.20/W Installed
	Plug and Play Controls Ready			$1.00/W Installed	N/A
	Networked Lighting Controls			$1.25/W Installed	N/A
	Luminaire Level Lighting Controls			$1.75/W Installed	N/A

- **Non-Prescriptive Offerings (Interior/Exterior) and Lighting Controls Commissioning –** Currently, non-prescriptive and lighting controls commissioning measures are offered by customer size. It is proposed to discontinue customer size-based incentive tiers and implement single, streamlined incentive rates applicable to all customer segments.
    - **New Fixtures/Retrofit Kit Offerings (Interior) –**
        - **No Controls / Basic Controls** – To further promote advanced control systems, it is proposed to reduce the offered incentive for basic controls to

align with the No Controls offering. The single, streamlined incentive for No Controls and Basic Controls will be set at $0.60/watt reduced.

- **Plug and Play Controls** – Similar to the prescriptive offering, it is also proposed to add a plug-and-play controls-ready fixture tier to interior non-prescriptive offerings. The initially offered incentive will be set at $0.80/watt reduced.
- **Area/Circuit Level NLCs** – The single, streamlined incentive for interior area/circuit level NLCs will be set at $1.00/watt reduced.
- **Fixture Level Advanced NLCs / LLLCs** – Similar to the prescriptive offering, it is proposed to add/qualify LLLCs under the Advanced NLC tier. The single, streamlined incentive for this offering will be set at $1.20/watt reduced.

- **Controls Only (Interior) –** The single, streamlined incentive offerings for Basic Controls, Area/Circuit Level NLCs, and Fixture Level Advanced NLCs/LLLCs will be set at $0.45, $0.60, and $0.75 per watt reduced, respectively.
- **New Fixtures/Retrofit Kit Offerings (Exterior) –** The single, streamlined incentive offerings for No Controls, Basic Exterior Dimming, and Advanced Network Dimming will be set at $0.35, $0.50, and $0.70 per watt reduced, respectively.
- **Controls Only (Exterior) –** The single, streamlined incentive offering for Basic Exterior Dimming and Advanced Networked Dimming will be set at $0.35 and $0.60 per watt reduced, respectively.
- **Lighting Controls Commissioning –** The single, streamlined incentive offering for Lighting Controls Commissioning will be set at $0.15 per watt controlled.

Offered Incentives for Non- Prescriptive Lighting System Retrofits

Measure	Category	Eligibility Requirements	Currently Offered Incentive (per Watt Reduced)			Proposed Offered Incentive (per Watt Reduced)
			Small Customer	Medium Customer	Large Customer	All Customer Sizes
Interior	New Fixtures/ Retrofit Kits	No Controls	$0.66	$0.66	$0.60	$0.60
		Basic Controls	$0.77	$0.77	$0.70	$0.60
		Plug and Play Control Ready	N/A			$0.80
		Area/Circuit Level NLCs	$1.10	$1.10	$1.00	$1.00
		Fixture Level Advanced NLCs/ LLLCs	$1.32	$1.32	$1.20	$1.20
	Controls Only	Basic Controls	$0.50	$0.50	$0.45	$0.45
		Area/Circuit Level Networked Lighting Controls	$0.66	$0.66	$0.60	$0.60
		Fixture Level Advanced Networked NLCs/LLLCs	$0.83	$0.83	$0.75	$0.75
Exterior	New Fixtures/ Retrofit Kits	No Controls	$0.39	$0.39	$0.35	$0.35
		Basic Exterior Dimming	$0.55	$0.55	$0.50	$0.50
		Advanced Networked Dimming	$0.77	$0.77	$0.70	$0.70
	Controls Only	Basic Exterior Dimming	$0.39	$0.39	$0.35	$0.35
		Advanced Networked Dimming	$0.66	$0.66	$0.60	$0.60

Measure	Category	Eligibility Requirements	Currently Offered Incentive (per Watt Reduced)			Proposed Offered Incentive (per Watt Reduced)
			Small Customer	Medium Customer	Large Customer	All Customer Sizes
Lighting Controls Commissioning			Per Watt Controlled			Per Watt Controlled
			$0.17	$0.17	$0.15	$0.15

Table 1b – New Construction/Major Renovation ("NCMR") Lighting Incentives

Currently, interior and exterior lighting incentives for NCMR projects are offered on a per fixture, fixture wattage, and per watt controlled basis. It is proposed to replace this structure with a universal per kWh-based structure based on controls in lieu of specific fixture types to streamline and improve participation.

- **Interior Lighting (Major Lighting Renovation Only) –** The maximum incentives for interior lighting offerings under the new $/kWh structure in Schedule 140 will be set at $0.08, $0.14, and $0.14 per kWh for No Controls, NLCs, and Advanced Networked Lighting Control ("ANLC") categories, respectively. The offered incentives will be set at $0.08, $0.10, and $0.14, respectively.
- **Exterior Lighting (Major Lighting Renovation Only)** – The maximum incentives for exterior lighting offerings under the new $/kWh structure in Schedule 140 will be set at $0.04, $0.07, and $0.07 per kWh for No Controls, Basic Exterior Dimming Controls, and Advanced Network Dimming Controls categories, respectively. The offered incentives will be set at $0.04, $0.05, and $0.07, respectively.

Maximum "up to" and Offered Incentives for NCMR Lighting

Measure	Category	Current Incentive		Proposed Incentive	
		Maximum	Offered	Maximum	Offered
Interior Lighting (Major Lighting Renovation Only)	Troffer	$10/Fixture		Discontinued	
	Linear Ambient	$10/Fixture			
	High-bay	$20/Fixture			
	Other (not listed above)	$0.50/Fixture Wattage			
	No Controls	N/A		$0.08/kWh	$0.08/kWh
	Networked Lighting Controls	N/A		$0.14/kWh	$0.10/kWh
	Advanced Networked Lighting Controls	$0.80/Watt Controlled	$0.35/Watt Controlled	$0.14/kWh	$0.14/kWh
Exterior Lighting (Major Lighting Renovation Only)	No Controls	N/A		$0.04/kWh	$0.04/kWh
	Basic Exterior Dimming Controls	N/A		$0.07/kWh	$0.05/kWh
	Advanced Networked Dimming Controls	$0.40/ Watt Controlled	$0.20/Watt Controlled	$0.07/kWh	$0.07/kWh

Table 2 – Motor Incentives

- **Green Motor Rewinds -** The organization that provided accreditation for Green Motor Rewinds no longer offers accreditation services. As a result, this measure can no longer be offered and will be discontinued.

Maximum "up to" and Offered Incentives for Motors

Measure	Current Incentive		Proposed Incentive	
	Maximum	Offered	Maximum	Offered
Green Motor Rewinds	$2/horsepower		Discontinued	

Tables 3a, 3b, and 4b – HVAC, Other HVAC, and Building Envelope Incentives

It is proposed to add "Retrofit/Major Renovation" to the headers of Tables 3a and 3b, and to remove the "New Construction" reference from Table 4b to clarify the eligible categories for the offerings in these tables. The Whole Building offerings in Table 15 are intended to capture HVAC and Building Envelope specifically for new construction.

Table 12 - Incentives for Small and Medium Business Express (Retrofit only)

Under the current structure for this offering, small businesses (less than 200 kW monthly demand) are eligible to participate with lighting and HVAC projects. While this structure has been successful, Medium customer participation has not been proportional in comparison to the small and large customer segments. To address this, it is proposed to discontinue the current structure/offerings in their entirety and replace Table 12 with a renamed and updated offering focused on lighting and lighting controls, similar to the proposed offerings in Table 1a, but tailored for small and medium customers. Under the new structure, small and medium customers will be eligible to receive incentives for fixture and kit installations with varying levels of controllability on a per watt installed basis. Customer projects are required to be installed by approved Trade Allies and will initially be capped at 75% of the total project cost, requiring customers to have a minimum co-pay of 25%. Customer eligibility will be based on usage data, capped at 200 kW of monthly demand for a single meter's highest demand reading on a customer's account over a 12-month period. Initially, customers with a demand reading below 110 kW and average monthly usage below 383k kWh will be eligible to participate. Demand/usage eligibility and project caps will be adjusted as needed based on participation levels.

Proposed Maximum "up to" Incentives for Small and Medium Business (SMB) Express

Measure	Eligibility	Equipment		Incentive "up to"
Lighting System Retrofit	Up to 200 kW monthly demand	Interior Lighting	New Fixture or Retrofit Kit	$3.50/W Installed
		Exterior Lighting		$1.20/W Installed

Proposed Offered Incentives for Small and Medium Business (SMB) Express

Measure	Equipment		Proposed Offered Incentive (per Watt Installed)	
			Interior	Exterior
Lighting System Retrofit	New Fixture or Retrofit Kit	No Controls	$1.50	$2.40
		Plug and Play Controls Ready	$2.00	N/A
		Networked Lighting Controls	$2.50	
		Luminaire Level Lighting Controls	$3.50	

Table 13a – Market Incentives – Lighting

- **Wall Pack Fixtures, Troffer Kit/fixtures, Linear Ambient Kit/Fixtures –** These offerings are often associated with capital improvement projects and better suited for a downstream offering through Table 1a where the application and use of controls can be influenced directly. As such, it is proposed to discontinue wall pack, troffer and linear ambient fixtures and kits from the Market offerings table.
- **Reflector Lamps, Pin-Based Lamps, Linear Replacement Lamps –** These lamp replacement measures will continue to be a Market offering exclusively for participating distributors. As stated in the Table 1a section above, this exclusive offering is intended to better focus on and influence distributor stocking practices and increase market adoption.
    - **Pin-based Lamps –** It is proposed to decrease the maximum "up to" incentive for Market Pin-based Lamps from $12/Lamp to $6/Lamp to maintain cost effectiveness for this offering.

"Maximum "up to" Incentives for Market Lighting

Equipment Type	Equipment Category	Current Incentive "up to"	Proposed Incentive "Up to"
LED	Pin-based Lamps	$12/Lamp	$6/Lamp
	Wall Pack Fixture	$30/Fixture	Discontinued
	Troffer Kit/Fixture	$30/Fixture	
	Linear Ambient Kit/Fixture	$20/Fixture	

Offered Incentives for Market Lighting

Category	Equipment	Current Offered Incentive (per Lamp, Fixture, Kit)		Equipment	Proposed Offered Incentive (Per Lamp)	
		Distributor	Customer		Distributor	Customer
Reflector Lamps	MR-16	$1.00	$1.00	MR-16	$2.00	$0
Pin-Based Lamps	PLC < 10W	$1.25	$1.25	PLC < 10W	$2.50	
	PLC ≥ 10W	$2.00	$2.50	PLC ≥ 10W	$4.50	
	PLL Lamp	$2.50	$3.00	PLL Lamp	$5.50	
Linear Replacement Lamps	< 20W	$2.00	$1.50	Type A/B Dual Mode	$3.50	
				Type A with Driver	$8.00	
	≥ 20W and ≤ 39W	$4.00	$4.00	Type B	$3.00	
				Type C	$7.00	
				Type C with available Continuous Dimming	$8.50	
HID Replacement Lamps	< 40 W	$10.00	$10.00	< 40 W	$20.00	
	≥ 40 W and < 70 W	$12.00	$12.00	≥ 40 W and < 70 W	$24.00	
	≥ 70 W and < 140 W	$20.00	$35.00	≥ 70 W and < 140 W	$55.00	
	≥ 140 W	$30.00	$50.00	≥ 140 W	$80.00	
Wall Pack Fixtures	> 20 W and < 75 W	$5.00	$25.00	> 20 W and < 75 W	Discontinued	
	≥ 75 W	$5.00	$25.00	≥ 75 W		
Troffer Kit/Fixture	--	$10.00	$18.00	--		
Linear Ambient Kit/Fixture	--	$5.00	$9.50	--		

Table 15 – Whole Building New Construction/Major Renovation Incentives

The current Whole Building offerings support customers who are completing new construction[1] or a major renovation.[2] Whole Building Major Renovation is defined as a gut-rehab that includes the replacement of the building's interior (except for framing), and where the applicable building energy code requires a permit that invokes compliance with the energy code for at least two out of three major building systems – HVAC, lighting, and building envelope – and the renovation will involve at least two out of the three major building systems. The header to Table 15 in Schedule 140 is being updated to include "Major Renovation" to clarify this category is not excluded from participating.

- **Construction Phase** – The Whole Building measure currently offers incentives during the construction phase of projects based on efficiency above code and Energy Use Intensity (EUI) target, regardless of the type of HVAC system. It is proposed that going forward, the construction phase offerings distinguish between all-electric HVAC vs. all-other HVAC systems, with further emphasis on HVAC system types (e.g. standard, gas, hybrid, and all-electric HVAC systems). It is proposed to set the maximum "up to" incentive for all-electric HVAC at $0.60/kWh and $0.30/kWh for all other HVAC systems. The currently offered incentives will also be adjusted under this new structure, differentiated as described above and reflected in the table below. These structural adjustments are driven by evidence of long simple payback for buildings with electric HVAC systems including variable refrigerant flow (VRF) and ground source heat pumps (GSHP). In contrast, buildings with non-electric HVAC systems have a shorter payback time. The proposed adjustments and structural changes are intended to right-size incentive offerings in consideration of payback timeframes.
- **Green Building Certification** – It is proposed to add a new offering for buildings that obtain Green Building Certification to encourage additional energy savings. The maximum "up to" incentive for this new offering will be set at $0.20/sq-ft. The initially offered incentives will be set at $0.20, $0.15, and $0.10 for small, medium, and large projects, respectively, reflected in the table below.

Maximum "up to" Incentives for Whole Building New Construction/Major Renovation

Category	Current Maximum Incentive "up to"	Proposed Maximum Incentive "up to"
Construction Phase – Electric HVAC	$0.24/kWh	$0.60/kWh
Construction Phase – Other HVAC	$0.24/kWh	$0.30/kWh
Green Building Certification	N/A	$0.20/sq-ft

[1] New Construction: A newly constructed facility or newly constructed square footage added to an existing facility.
[2] Major Renovation: A change in facility use type or where the existing system will not meet Owner/Customer projected requirements within existing facility square footage.

Offered Incentives for Whole Building New Construction/Major Renovation

Category	Eligibility Requirements	Small Project (< 20,000 sq. ft.)		Medium Project (≥ 20,000 sq. ft. < 75,000 sq. ft.)		Large Project (≥ 75,000 sq. ft.)	
		Current Incentive	Proposed Incentive	Current Incentive	Proposed Incentive	Current Incentive	Proposed Incentive
		Per kWh		Per kWh		Per kWh	
Construction Phase	Standard Efficiency	$0.17	$0	$0.15	$0	$0.12	$0
	High Performance EUI	$0.20	$0	$0.17	$0	$0.15	$0
Construction Phase – Other HVAC	Code-Standard HVAC systems.	N/A	$0.17	N/A	$0.15	N/A	$0.12
	Gas Unit Heaters and Gas-Fired rooftop units as primary heat source	N/A	$0.09	N/A	$0.07	N/A	$0.06
	Combination of Electric and Gas HVAC systems	N/A	$0.20	N/A	$0.17	N/A	$0.15
Construction Phase – Electric HVAC	Electric HVAC as primary source	N/A	$0.55	N/A	$0.50	N/A	$0.45
Green Building Certification	Must provide copy of green certification	Per Square Foot		Per Square Foot		Per Square Foot	
		N/A	$0.20	N/A	$0.15	N/A	$0.10

*Incentives may be capped based on project size. Project caps are subject to adjustments as needed to ensure the effective operation of the program.

COST-EFFECTIVENESS

A cost effectiveness analysis for the Wattsmart Business Program channels discussed in this Advice Letter is attached hereto as Exhibit B, and assumes the maximum "up to" incentives for offerings. The table below, pulled from Exhibit B, presents the expected cost effectiveness of the proposed Program changes for 2025 through 2026. Additional details and inputs are included in Exhibit B. Sensitivity analyses are also included as Exhibits C and D. The Program is expected to remain cost effective from the Utility Cost Test perspective under all scenarios.

Overall, the TRC tests are not expected to pass for these Program channels, which is primarily due to the lighting measure category having a high measure cost relative to the kWh savings, and is expected to have significant participation. The Company believes that its lighting offerings are a critical component of the Program and should remain intact, serving as a universal way to get customers to participate in the Program and install additional measures. The RIM test is also expected to fail due to creating upward pressure on rates from comparing avoided costs benefits of the conserved energy to the costs incurred by the utility. However, because retail rates used to calculate lost revenue are higher than avoided costs, energy efficiency measures and programs almost always fail the RIM test. Notwithstanding the TRC and RIM test results, the Company believes its proposed offerings are in the public interest.

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.050	$70,114,772	$90,223,687	$20,108,915	1.09
Total Resource Cost Test (TRC) No Adder	$0.082	$114,583,533	$90,223,687	($24,359,846)	0.79
Total Resource Cost Test (PTRC) + Conservation Adder	$0.082	$114,583,533	$99,246,055	($15,337,478)	0.87
Participant Cost Test (PCT)		$131,899,254	$237,789,092	$105,889,838	1.90
Rate Impact Test (RIM)		$256,086,170	$90,223,687	($165,862,483)	0.34
Lifecycle Revenue Impacts ($/kWh)					$0.00081

STAKEHOLDER COLLABORATION

On March 13, 2025, the Company discussed the proposed changes in this Advice Letter with the DSM Steering Committee. On May 29, 2025, the Company circulated a draft of this Advice Letter to Steering Committee members for initial review and comment prior to submitting it to the Commission for approval.

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 inquiries regarding this matter may be directed to me at (801) 220-4214.

Sincerely,

Michael S. Snow
Manager, Regulatory Affairs

Enclosures
cc: Division of Public Utilities
Office of Consumer Services

CERTIFICATE OF SERVICE

Docket No. 25-035-T07

I hereby certify that on June 11, 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

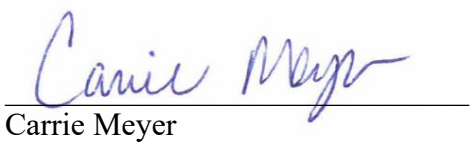
dpudatarequest@utah.gov

Assistant Attorney General

Patricia Schmid	pschmid@agutah.gov
Robert Moore	rmoore@agutah.gov
Patrick Grecu	pgrecu@agutah.gov

Rocky Mountain Power

Data Request Response Center	datarequest@pacificorp.com
Jana Saba	jana.saba@pacificorp.com
	utahdockets@pacificorp.com
Max Backlund	max.backlund@pacificorp.com
Michael Snow	Michael.snow@pacificorp.com



Carrie Meyer
Manager, Discovery & Regulatory Operations

EXHIBIT A

PROPOSED TARIFFS

ELECTRIC SERVICE SCHEDULE NO. 140 - Continued

Table 1 - INCENTIVES:[1]

Category	Incentive "up to"	Percent Project Cost Cap	1-Year Simple Payback Cap for Projects[2]	Other Limitations
Prescriptive Incentives*	See Tables 1a-11	See ~~Tables 1a-11~~incentive lists on company website	See ~~Tables 1a-11~~incentive lists on company website	See Tables 1a-11
Small and Medium Business (SMB) Express~~nhanced~~	Determined by Company with not-to-exceed amounts as shown in Table 12	Up to 90%	No	Available to all ~~Schedule 6, 6A, and 23 customers meeting eligibility requirements.~~ customer accounts classified as Small or Medium on the account lookup site. Qualifying equipment must be installed by an approved contractor/vendor
Market Incentives	Determined by Company with not-to-exceed amounts as shown in Table 13	N/A	No	Incentives available to different market actors in the supply chain, including manufacturers, distributors, contractors and end-use customers.
HVAC Check-up Incentives	Determined by Company with not-to-exceed amounts as shown in Table 14	N/A	No	Qualifying equipment must be installed by an approved contractor/vendor.
Whole Building New Construction Incentive	Determined by Company with not-to-exceed amounts as shown in Table 15	N/A	No	Building types not eligible: multifamily.
Custom Non-Lighting Incentives for qualifying measures not on the prescriptive list.[3]	$0.15 per annual kWh savings	70%	Yes	N/A
Energy Management	$0.02 per kWh annual savings	N/A	No	N/A
Energy Project Manager Co-Funding	$0.025 per kWh annual savings	100% of salary and eligible overhead	No	Minimum 1,000,000 kWh through qualified measures
Bill Credit[4]	80% of eligible project costs	80%	No	Customers with minimum 1 MW peak or annual usage of 5,000,000 kWh**

*Incentives for measures contained in Tables 1a-11 are restricted to the amounts shown in Tables 1a-11 or the appropriate bill credit amount.
**Customers may aggregate accounts to achieve minimum requirements.

[1] The customer or Owner may receive only one financial incentive from the Company per measure. Financial incentives include energy efficiency incentive payments, bill credits, and energy management payments. Energy Project Manager Co-Funding is available in addition to the project incentives.
[2] The 1 year simple payback cap means incentives will not be available to reduce the simple payback of a project below one year. If required, individual measure incentives will be adjusted downward pro-rata so the project has a simple payback after incentives of one year.
[3] Project Cost and 1-Year Simple Payback Caps do not apply to New Construction and Major Renovation projects that are subject to state energy code.
[4] To qualify for the bill credit option, a project must have a projected payback period of between 1 and 8 years. The Company may accept a project with a projected payback period in excess of eight years if project benefits satisfy the Commission's approved cost-effectiveness test. New Construction, lighting retrofits and Pre-payment projects are not eligible for bill credit.

(continued)

ELECTRIC SERVICE SCHEDULE NO. 140 - Continued

Table 1a - Lighting System Retrofits

Measure	Category		Incentive "up to"
Lighting System Retrofit	Interior Lighting	Prescriptive	$3.50/W Installed~~See Market table~~
		Non-Prescriptive	$1.50/W Reduced
	Exterior Lighting	Prescriptive	$1.20/W Installed~~See Market table~~
		Non-Prescriptive	$0.80/W Reduced
	Controlled Environment Agriculture		$0.05/kWh
	Controls-Only		$0.80/W Controlled
	Lighting Controls Commissioning		$0.17/W Controlled
	Custom		$0.85/W Reduced

Table 1b – New Construction/Major Renovation Lighting Incentives

Measure	Category	Incentive "up to"
Interior Lighting (Major Lighting Renovation Only)	No Controls~~Troffer~~	$0.08/kWh~~$10/Fixture~~
	Controls – Network Lighting or Advanced Networked Lighting ~~Linear Ambient~~	$0.14/kWh~~$10/Fixture~~
	~~Highbay~~	~~$20/Fixture~~
	~~Other (not listed above)~~	~~$0.50/Fixture Wattage~~
	~~Advanced Lighting Controls~~	~~$0.80/ W Controlled~~
Exterior Lighting (Major Lighting Renovation Only)	No Controls	$0.04/kWh
	Controls - Basic Exterior Dimming or Advanced Networked Dimming~~Lighting Controls~~	$0.07/kWh~~$0.40/ W Controlled~~
Controlled Environment Agriculture		$0.05/kWh

Table 2 - Motor Incentives

Equipment Type	Incentive "up to"
Electronically Commutated Motor	$3/watt or $200/horsepower based on application
Variable Frequency Drives	$200/horsepower
~~Green Motor Rewinds~~	~~$2/horsepower~~

Table 3a – HVAC Incentives (Retrofit/Major Renovation)

Equipment Type	Incentive "up to"
Unitary Commercial Air Conditioners	$100/ton
Packaged Terminal Air Conditioners (PTAC)	$25/ton
Packaged Terminal Heat Pumps (PTHP) (Heating & Cooling Mode)	$50/ton
Unitary Commercial Heat Pumps	$300/ton
Heat Pump Loop	$125/ton
Variable Refrigerant Flow Heat Pumps	$1,000/indoor-unit-head or $300/ton based on equipment type

(continued)

ELECTRIC SERVICE SCHEDULE NO. 140 - Continued

Table 3b –Other HVAC Incentives (Retrofit/Major Renovation)

Equipment Type	Incentive "up to"
Evaporative Cooling	$0.06/ CFM
Indirect-Direct Evaporative Cooling (IDEC)	$0.15/kWh annual energy savings
Chillers	$0.50/kWh annual energy savings
Evaporative Pre-cooler (Retrofit Only)	$75/ton of attached cooling capacity
Advanced Rooftop Unit Control (Retrofit)	$6,500
Advanced Rooftop Unit Control (New RTU)	$4,500
Advanced Rooftop Unit Control (DCV Only)	$800
Thermostats	$150

Table 4a – Building Envelope Incentives (Retrofit)

Equipment Type	Incentive "up to"
Cool Roof	$0.04/square foot
Roof/Attic Insulation	$0.50/square foot
Wall Insulation	$0.50/square foot
Windows	$1.50/square foot
Window Film	$0.15/kWh annual energy savings

Table 4b – Building Envelope Incentives (~~New Construction/~~Major Renovation)

Equipment Type	Incentive "up to"
Cool Roof	$0.02/square foot
Roof/Attic Insulation	$0.03/square foot
Wall Insulation	$0.07/square foot
Windows	$0.35/square foot

(continued)

ELECTRIC SERVICE SCHEDULE NO. 140 – Continued

Table 10 – Compressed Air Incentives

Equipment Category	Incentive "up to"
Low Pressure Drop Filter Replacement	$2/scfm
Receiver Capacity Addition	$3/gal above 2 gallons per scfm
Cycling Refrigerated Dryer	$2/scfm
Variable Frequency Drive Controlled Compressor	$0.15/kWh annual energy savings
Zero Loss Condensate Drain	$100 each
Outside Air Intake	$6/horsepower
Compressed air end use reduction	$0.15/kWh annual energy savings

Table 11 - Incentives for Wastewater, Oil and Gas, Fleet Vehicle, and Other Refrigeration Energy Efficiency Measures

Equipment Type	Incentive "up to"
Adaptive refrigeration control	$0.15/kWh annual energy savings
Fast acting door	$0.15/kWh annual energy savings
Engine block heater control	$150 per controller
Oil and gas pump off controller	$1,500 per controller
Wastewater – low power mixer	$0.15/kWh annual energy savings

~~**Small Business Enhanced (Retrofit only)**~~

~~Incentives and participation for small business enhanced offerings may include but not be limited to lighting, plug load, HVAC measures, and areas being canvassed. Participating customers are required to pay for up to 50% of the qualifying equipment costs.~~

Table 12 – Incentives for Small and Medium Business (SMB) Express~~Enhanced (Retrofit only)~~

Measure~~Eligible Customer Rate Schedules~~	Eligibility Requirements	Equipment~~Incentive "up to"~~		Incentive~~Customer Co-pay~~ "up to"	
				~~Minimum~~	~~Maximum~~
Lighting System Retrofit	Up to 200 kW monthly demand	Interior Lighting	New Fixture or Retrofit Kit	$3.50/W Installed	
		Exterior Lighting		$1.20/W Installed	
~~6~~	~~Non-residential facilities not in excess of 200 kW demand monthly in the last twelve months.~~	~~$5,000 per facility~~		~~10%~~	~~50%~~
~~6a~~	~~Non-residential facilities not in excess of 200 kW demand monthly in the last twelve months.~~	~~$5,000 per facility~~		~~10%~~	~~50%~~
~~23~~		~~$5,000 per facility~~		~~10%~~	~~50%~~

(continued)

ELECTRIC SERVICE SCHEDULE NO. 140 – Continued

Table 13a – Market Incentives -Lighting

Measure	Category	Incentive "up to"
LED	Reflector Lamps	$15/Lamp
	Pin-based Lamps	$612/Lamp
	Linear Replacement Lamps	$11/Lamp
	HID Replacement Lamps	$110/Lamp
	~~Wall Pack Fixture~~	~~$30/Fixture~~
	~~Troffer Kit/Fixture~~	~~$30/Fixture~~
	~~Linear Ambient Kit/Fixture~~	~~$20/Fixture~~

Table 13b – Market Incentives –HVAC

Measure	Incentive "up to"
Unitary Commercial Air Conditioners	$100/Ton

Table 14 – HVAC Check-up Incentives

Measure	Incentive "up to"
RTU Maintenance Agreement	$75/RTU
Chiller Maintenance Agreement	$10/ton
Thermostats	$250/Thermostat
Economizer	$150/RTU
Refrigerant	$35/Ton RTU Capacity

Table 15 – Whole Building New Construction/Major Renovation Incentives

Measure	Incentive "up to"
Early Engagement Design Charrette	$2,500/project
Design Phase	$0.35/sq-ft
Construction Phase – Other HVAC	$0.3024/kWh
Construction Phase – Electric HVAC	$0.60/kWh
Performance Phase	$0.05/kWh
Green Building Certification	$0.20/sq-ft

ELECTRIC SERVICE SCHEDULE NO. 140 - Continued

Table 1 - INCENTIVES:[1]

Category	Incentive "up to"	Percent Project Cost Cap	1-Year Simple Payback Cap for Projects[2]	Other Limitations
Prescriptive Incentives*	See Tables 1a-11	See incentive lists on company website	See incentive lists on company website	See Tables 1a-11
Small and Medium Business (SMB) Express	Determined by Company with not-to-exceed amounts as shown in Table 12	Up to 90%	No	Available to all customer accounts classified as Small or Medium on the account lookup site. Qualifying equipment must be installed by an approved contractor/vendor
Market Incentives	Determined by Company with not-to-exceed amounts as shown in Table 13	N/A	No	Incentives available to different market actors in the supply chain, including manufacturers, distributors, contractors and end-use customers.
HVAC Check-up Incentives	Determined by Company with not-to-exceed amounts as shown in Table 14	N/A	No	Qualifying equipment must be installed by an approved contractor/vendor.
Whole Building New Construction Incentive	Determined by Company with not-to-exceed amounts as shown in Table 15	N/A	No	Building types not eligible: multifamily.
Custom Non-Lighting Incentives for qualifying measures not on the prescriptive list.[3]	$0.15 per annual kWh savings	70%	Yes	N/A
Energy Management	$0.02 per kWh annual savings	N/A	No	N/A
Energy Project Manager Co-Funding	$0.025 per kWh annual savings	100% of salary and eligible overhead	No	Minimum 1,000,000 kWh through qualified measures
Bill Credit[4]	80% of eligible project costs	80%	No	Customers with minimum 1 MW peak or annual usage of 5,000,000 kWh**

*Incentives for measures contained in Tables 1a-11 are restricted to the amounts shown in Tables 1a-11 or the appropriate bill credit amount.

**Customers may aggregate accounts to achieve minimum requirements.

[1] The customer or Owner may receive only one financial incentive from the Company per measure. Financial incentives include energy efficiency incentive payments, bill credits, and energy management payments. Energy Project Manager Co-Funding is available in addition to the project incentives.

[2] The 1 year simple payback cap means incentives will not be available to reduce the simple payback of a project below one year. If required, individual measure incentives will be adjusted downward pro-rata so the project has a simple payback after incentives of one year.

[3] Project Cost and 1-Year Simple Payback Caps do not apply to New Construction and Major Renovation projects that are subject to state energy code.

[4] To qualify for the bill credit option, a project must have a projected payback period of between 1 and 8 years. The Company may accept a project with a projected payback period in excess of eight years if project benefits satisfy the Commission's approved cost-effectiveness test. New Construction, lighting retrofits and Pre-payment projects are not eligible for bill credit.

(continued)

ELECTRIC SERVICE SCHEDULE NO. 140 - Continued

Table 1a - Lighting System Retrofits

Measure	Category		Incentive "up to"
Lighting System Retrofit	Interior Lighting	Prescriptive	$3.50/W Installed
		Non-Prescriptive	$1.50/W Reduced
	Exterior Lighting	Prescriptive	$1.20/W Installed
		Non-Prescriptive	$0.80/W Reduced
	Controlled Environment Agriculture		$0.05/kWh
	Controls-Only		$0.80/W Controlled
	Lighting Controls Commissioning		$0.17/W Controlled
	Custom		$0.85/W Reduced

Table 1b – New Construction/Major Renovation Lighting Incentives

Measure	Category	Incentive "up to"
Interior Lighting (Major Lighting Renovation Only)	No Controls	$0.08/kWh
	Controls – Network Lighting or Advanced Networked Lighting	$0.14/kWh
Exterior Lighting (Major Lighting Renovation Only)	No Controls	$0.04/kWh
	Controls - Basic Exterior Dimming or Advanced Networked Dimming	$0.07/kWh
Controlled Environment Agriculture		$0.05/kWh

Table 2 - Motor Incentives

Equipment Type	Incentive "up to"
Electronically Commutated Motor	$3/watt or $200/horsepower based on application
Variable Frequency Drives	$200/horsepower

Table 3a – HVAC Incentives (Retrofit/Major Renovation)

Equipment Type	Incentive "up to"
Unitary Commercial Air Conditioners	$100/ton
Packaged Terminal Air Conditioners (PTAC)	$25/ton
Packaged Terminal Heat Pumps (PTHP) (Heating & Cooling Mode)	$50/ton
Unitary Commercial Heat Pumps	$300/ton
Heat Pump Loop	$125/ton
Variable Refrigerant Flow Heat Pumps	$1,000/indoor-unit-head or $300/ton based on equipment type

(continued)

ELECTRIC SERVICE SCHEDULE NO. 140 - Continued

Table 3b –Other HVAC Incentives (Retrofit/Major Renovation)

Equipment Type	Incentive "up to"
Evaporative Cooling	$0.06/ CFM
Indirect-Direct Evaporative Cooling (IDEC)	$0.15/kWh annual energy savings
Chillers	$0.50/kWh annual energy savings
Evaporative Pre-cooler (Retrofit Only)	$75/ton of attached cooling capacity
Advanced Rooftop Unit Control (Retrofit)	$6,500
Advanced Rooftop Unit Control (New RTU)	$4,500
Advanced Rooftop Unit Control (DCV Only)	$800
Thermostats	$150

Table 4a – Building Envelope Incentives (Retrofit)

Equipment Type	Incentive "up to"
Cool Roof	$0.04/square foot
Roof/Attic Insulation	$0.50/square foot
Wall Insulation	$0.50/square foot
Windows	$1.50/square foot
Window Film	$0.15/kWh annual energy savings

Table 4b – Building Envelope Incentives (Major Renovation)

Equipment Type	Incentive "up to"
Cool Roof	$0.02/square foot
Roof/Attic Insulation	$0.03/square foot
Wall Insulation	$0.07/square foot
Windows	$0.35/square foot

(continued)

ELECTRIC SERVICE SCHEDULE NO. 140 – Continued

Table 10 – Compressed Air Incentives

Equipment Category	Incentive "up to"
Low Pressure Drop Filter Replacement	$2/scfm
Receiver Capacity Addition	$3/gal above 2 gallons per scfm
Cycling Refrigerated Dryer	$2/scfm
Variable Frequency Drive Controlled Compressor	$0.15/kWh annual energy savings
Zero Loss Condensate Drain	$100 each
Outside Air Intake	$6/horsepower
Compressed air end use reduction	$0.15/kWh annual energy savings

Table 11 - Incentives for Wastewater, Oil and Gas, Fleet Vehicle, and Other Refrigeration Energy Efficiency Measures

Equipment Type	Incentive "up to"
Adaptive refrigeration control	$0.15/kWh annual energy savings
Fast acting door	$0.15/kWh annual energy savings
Engine block heater control	$150 per controller
Oil and gas pump off controller	$1,500 per controller
Wastewater – low power mixer	$0.15/kWh annual energy savings

Table 12 – Incentives for Small and Medium Business (SMB) Express

Measure	Eligibility Requirements	Equipment		Incentive "up to"
Lighting System Retrofit	Up to 200 kW monthly demand	Interior Lighting	New Fixture or Retrofit Kit	$3.50/W Installed
		Exterior Lighting		$1.20/W Installed

(continued)

ELECTRIC SERVICE SCHEDULE NO. 140 – Continued

Table 13a – Market Incentives -Lighting

Measure	Category	Incentive "up to"
LED	Reflector Lamps	$15/Lamp
	Pin-based Lamps	$6/Lamp
	Linear Replacement Lamps	$11/Lamp
	HID Replacement Lamps	$110/Lamp

Table 13b – Market Incentives –HVAC

Measure	Incentive "up to"
Unitary Commercial Air Conditioners	$100/Ton

Table 14 – HVAC Check-up Incentives

Measure	Incentive "up to"
RTU Maintenance Agreement	$75/RTU
Chiller Maintenance Agreement	$10/ton
Thermostats	$250/Thermostat
Economizer	$150/RTU
Refrigerant	$35/Ton RTU Capacity

Table 15 – Whole Building New Construction/Major Renovation Incentives

Measure	Incentive "up to"
Early Engagement Design Charrette	$2,500/project
Design Phase	$0.35/sq-ft
Construction Phase – Other HVAC	$0.30/kWh
Construction Phase – Electric HVAC	$0.60/kWh
Performance Phase	$0.05/kWh
Green Building Certification	$0.20/sq-ft

EXHIBIT B

Memorandum

To: Nancy Goddard, Clay Monroe, Rocky Mountain Power

From: Eli Morris, Andy Hudson, Elizabeth Applegate, Julian Graybill Brubaker, ICF

Date: 23 May 2025

Re: Utah Wattsmart Business Program Cost-Effectiveness Analysis, Base Case Participation – PY2025-2026

ICF estimated the cost-effectiveness of Rocky Mountain Power's Wattsmart Business Program in the state of Utah based on Program Year (PY) 2025 and 2026 costs and savings estimates developed by program implementation staff, reviewed by ICF, and finalized by Rocky Mountain Power. This memo provides cost-effectiveness results at the program level for the Base participation case. The program passes the Utility Cost Test (UCT) and the Participant Cost Test (PCT) under these conditions.

This memo provides analysis inputs and results in the following tables:

- Table 1: Cost-Effectiveness Analysis Inputs
- Table 2: Annual Program Costs by Program Year, Nominal - PY2025-2026
- Table 3: Annual Savings in kWh by Program Year - PY2025-2026
- Table 4: Benefit/Cost Ratios by Program Year - PY2025-2026
- Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2025
- Table 6: Wattsmart Business Program Cost-Effectiveness Results, PY2026
- Table 7: Wattsmart Business Program Cost-Effectiveness Results, PY2025-2026
- Table 8: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2025
- Table 9: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2026
- Table 10: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2025
- Table 11: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2026
- Table 12: Wattsmart Business Whole Building New Construction Delivery Cost-Effectiveness Results, PY2025
- Table 13: Wattsmart Business Whole Building New Construction Delivery Cost-Effectiveness Results, PY2026
- Table 14: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2025
- Table 15: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2026

The following assumptions were utilized in the analysis:

- Avoided Costs: Hourly values provided by Rocky Mountain Power based on the 2023 Integrated Resource Plan (IRP) Preferred Portfolio, converted into annual values using Utah load shapes from the same IRP.
- Modeling Inputs: measure savings, costs, measure lives, incentive levels, program delivery, and portfolio costs were provided by Rocky Mountain Power.
- Other Economic Assumptions: Discount rate, line loss, retail rate, and inflation rate values were provided by Rocky Mountain Power and are presented in Table 1 below.

The following tables summarize cost-effectiveness assumptions and results for the Utah Wattsmart Business Program. Tables 1 through 3 below show the cost-effectiveness analysis inputs. Tables 4 through 13 present the cost-effectiveness results of the Wattsmart Business program for PY2025-PY2026 at the program and delivery channel levels. Tables 14 and 15 present results at the measure category level for PY2025-PY2026. All results are presented in 2025 dollars.[1]

Table 1: Cost-Effectiveness Analysis Inputs

Parameter	PY2025-PY2026
Discount Rate	6.77%
Commercial Line Loss	5.86%
Commercial Energy Rate ($/kWh)	$0.09
Inflation Rate[1]	2.27%

Table 2: Annual Program Costs by Program Year, Nominal - PY2025-PY2026

Program Year	Program Delivery	Utility Admin	Incentives	Total Utility Costs	Gross Customer Costs
2025	$6,650,973	$473,429	$25,369,626	$32,494,028	$36,573,144
2026	$11,455,637	$473,429	$41,780,544	$53,709,610	$63,755,902
2025-2026	$18,106,610	$946,858	$67,150,170	$86,203,638	$100,329,047

Table 3: Annual Savings in kWh by Program Year - PY2025-PY2026

Program Year	Gross kWh Savings at Site	Realization Rate	Adjusted Gross kWh Savings at Site	Net to Gross Ratio	Net kWh Savings at Site	Measure Life
2025	78,135,992	98%	76,838,035	73%	56,091,765	15
2026	131,330,777	98%	129,146,258	73%	94,276,768	14
2025-2026	209,466,768	98%	205,984,292	73%	150,368,533	14

Table 4: Benefit/Cost Ratios by Measure Category - PY2025-PY2026

Program Year	UCT	TRC	PTRC	PCT	RIM
2025	1.12	0.84	0.92	1.98	0.34
2026	1.07	0.76	0.83	1.85	0.33
2025-2026	1.09	0.79	0.87	1.90	0.34

[1] Future rates determined using a 2.27% annual escalator.

Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.058	$32,494,028	$36,523,967	$4,029,940	1.12
Total Resource Cost Test (TRC) No Adder	$0.078	$43,697,546	$36,523,967	($7,173,579)	0.84
Total Resource Cost Test (PTRC) + Conservation Adder	$0.078	$43,697,546	$40,176,364	($3,521,182)	0.92
Participant Cost Test (PCT)		$50,100,198	$99,345,853	$49,245,655	1.98
Rate Impact Test (RIM)		$106,470,255	$36,523,967	($69,946,288)	0.34
Lifecycle Revenue Impacts ($/kWh)					$0.00033

Table 6: Wattsmart Business Program Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.060	$50,304,028	$53,699,720	$3,395,692	1.07
Total Resource Cost Test (TRC) No Adder	$0.085	$70,885,987	$53,699,720	($17,186,267)	0.76
Total Resource Cost Test (PTRC) + Conservation Adder	$0.085	$70,885,987	$59,069,692	($11,816,295)	0.83
Participant Cost Test (PCT)		$81,799,056	$151,126,523	$69,327,466	1.85
Rate Impact Test (RIM)		$162,299,199	$53,699,720	($108,599,479)	0.33
Lifecycle Revenue Impacts ($/kWh)					$0.00052

Table 7: Wattsmart Business Program Cost-Effectiveness Results, PY2025-2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.060	$82,798,055	$90,223,687	$7,425,631	1.09
Total Resource Cost Test (TRC) No Adder	$0.082	$114,583,533	$90,223,687	($24,359,846)	0.79
Total Resource Cost Test (PTRC) + Conservation Adder	$0.082	$114,583,533	$99,246,055	($15,337,478)	0.87
Participant Cost Test (PCT)		$131,899,254	$250,472,376	$118,573,122	1.90
Rate Impact Test (RIM)		$268,769,454	$90,223,687	($178,545,767)	0.34
Lifecycle Revenue Impacts ($/kWh)					$0.00081

Table 8: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.055	$20,580,616	$23,288,732	$2,708,116	1.13
Total Resource Cost Test (TRC) No Adder	$0.093	$35,108,668	$23,288,732	($11,819,936)	0.66
Total Resource Cost Test (PTRC) + Conservation Adder	$0.093	$35,108,668	$25,617,605	($9,491,062)	0.73
Participant Cost Test (PCT)		$41,359,582	$64,969,336	$23,609,754	1.57
Rate Impact Test (RIM)		$69,885,509	$23,288,732	($46,596,777)	0.33
Lifecycle Revenue Impacts ($/kWh)					$0.00021

Table 9: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.060	$36,747,102	$37,940,696	$1,193,594	1.03
Total Resource Cost Test (TRC) No Adder	$0.094	$58,084,898	$37,940,696	($20,144,202)	0.65
Total Resource Cost Test (PTRC) + Conservation Adder	$0.094	$58,084,898	$41,734,765	($16,350,133)	0.72
Participant Cost Test (PCT)		$67,692,493	$110,104,638	$42,412,145	1.63
Rate Impact Test (RIM)		$118,774,016	$37,940,696	($80,833,320)	0.32
Lifecycle Revenue Impacts ($/kWh)					$0.00038

Table 10: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.143	$4,918,774	$2,211,187	($2,707,587)	0.45
Total Resource Cost Test (TRC) No Adder	$0.047	$1,627,456	$2,211,187	$583,731	1.36
Total Resource Cost Test (PTRC) + Conservation Adder	$0.047	$1,627,456	$2,432,306	$804,850	1.49
Participant Cost Test (PCT)		$1,515,416	$8,840,393	$7,324,977	5.83
Rate Impact Test (RIM)		$9,361,595	$2,211,187	($7,150,408)	0.24
Lifecycle Revenue Impacts ($/kWh)					$0.00004

Table 11: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.063	$991,051	$1,045,615	$54,564	1.06
Total Resource Cost Test (TRC) No Adder	$0.072	$1,135,365	$1,045,615	($89,749)	0.92
Total Resource Cost Test (PTRC) + Conservation Adder	$0.072	$1,135,365	$1,150,177	$14,812	1.01
Participant Cost Test (PCT)		$1,119,945	$2,753,663	$1,633,718	2.46
Rate Impact Test (RIM)		$3,071,468	$1,045,615	($2,025,852)	0.34
Lifecycle Revenue Impacts ($/kWh)					$0.00001

Table 12: Wattsmart Business Whole Building New Construction Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.047	$6,994,638	$11,024,048	$4,029,410	1.58
Total Resource Cost Test (TRC) No Adder	$0.047	$6,961,423	$11,024,048	$4,062,626	1.58
Total Resource Cost Test (PTRC) + Conservation Adder	$0.047	$6,961,423	$12,126,453	$5,165,030	1.74
Participant Cost Test (PCT)		$7,225,199	$25,536,124	$18,310,924	3.53
Rate Impact Test (RIM)		$27,223,151	$11,024,048	($16,199,102)	0.40
Lifecycle Revenue Impacts ($/kWh)					$0.00009

Table 13: Wattsmart Business Whole Building New Construction Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.063	$12,565,875	$14,713,409	$2,147,534	1.17
Total Resource Cost Test (TRC) No Adder	$0.059	$11,665,725	$14,713,409	$3,047,684	1.26
Total Resource Cost Test (PTRC) + Conservation Adder	$0.059	$11,665,725	$16,184,750	$4,519,025	1.39
Participant Cost Test (PCT)		$12,986,618	$38,268,222	$25,281,603	2.95
Rate Impact Test (RIM)		$40,453,715	$14,713,409	($25,740,306)	0.36
Lifecycle Revenue Impacts ($/kWh)					$0.00015

Table 14: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2025

Program	Measure Category	Utility Benefits ($)	Utility Costs ($)	Utility Cost Test	TRC Benefits ($)	TRC Costs ($)	TRC Test	P-TRC Benefits ($)	P-TRC Costs ($)	P-TRC Test	Participant PV Benefits ($)	Participant PV Costs ($)	PCT Test	Ratepayer PV Benefits ($)	Ratepayer PV Costs Costs ($)	RIM Test
Wattsmart Business	Appliances	$469	$313	1.50	$469	$910	0.51	$515	$910	0.57	$1,188	$1,092	1.09	$469	$1,300	0.36
Wattsmart Business	Building Shell	$329,741	$93,585	3.52	$329,741	$169,648	1.94	$362,715	$169,648	2.14	$674,453	$176,250	3.83	$329,741	$715,438	0.46
Wattsmart Business	Electronics	$38,761	$12,504	3.10	$38,761	$16,052	2.41	$42,638	$16,052	2.66	$71,665	$10,614	6.75	$38,761	$79,970	0.48
Wattsmart Business	Energy Management	$1,001,956	$485,611	2.06	$1,001,956	$473,892	2.11	$1,102,151	$473,892	2.33	$1,806,900	$103,612	17.44	$1,001,956	$2,205,155	0.45
Wattsmart Business	Food Service	$2,060	$4,667	0.44	$2,060	$6,117	0.34	$2,266	$6,117	0.37	$7,992	$7,877	1.01	$2,060	$8,359	0.25
Wattsmart Business	HVAC	$1,280,967	$1,178,918	1.09	$1,280,967	$2,370,605	0.54	$1,409,064	$2,370,605	0.59	$4,111,919	$2,829,607	1.45	$1,280,967	$4,416,911	0.29
Wattsmart Business	Lighting	$22,748,735	$23,653,584	0.96	$22,748,735	$33,633,522	0.68	$25,023,608	$33,633,522	0.74	$66,780,139	$39,568,657	1.69	$22,748,735	$71,528,541	0.32
Wattsmart Business	Refrigeration	$825	$388	2.13	$825	$1,658	0.50	$907	$1,658	0.55	$1,542	$2,082	0.74	$825	$1,680	0.49
Wattsmart Business	Water Heating	$96,406	$151,562	0.64	$96,406	$145,463	0.66	$106,046	$145,463	0.73	$353,931	$175,207	2.02	$96,406	$371,493	0.26
Wattsmart Business	Whole Building	$11,024,048	$6,912,895	1.59	$11,024,048	$6,879,680	1.60	$12,126,453	$6,879,680	1.76	$25,536,124	$7,225,199	3.53	$11,024,048	$27,141,408	0.41

Table 15: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2026

Program	Measure Category	Utility Benefits ($)	Utility Costs ($)	Utility Cost Test	TRC Benefits ($)	TRC Costs ($)	TRC Test	P-TRC Benefits ($)	P-TRC Costs ($)	P-TRC Test	Participant PV Benefits ($)	Participant PV Costs ($)	PCT Test	Ratepayer PV Benefits ($)	Ratepayer PV Costs Costs ($)	RIM Test
Wattsmart Business	Appliances	$563	$349	1.61	$563	$946	0.60	$620	$946	0.66	$1,458	$1,105	1.32	$563	$1,597	0.35
Wattsmart Business	Building Shell	$455,121	$133,075	3.42	$455,121	$239,828	1.90	$500,633	$239,828	2.09	$975,392	$249,134	3.92	$455,121	$1,033,352	0.44
Wattsmart Business	Electronics	$52,851	$18,970	2.79	$52,851	$25,260	2.09	$58,136	$25,260	2.30	$103,559	$18,816	5.50	$52,851	$115,083	0.46
Wattsmart Business	Energy Management	$3,145,235	$1,557,070	2.02	$3,145,235	$1,515,391	2.08	$3,459,759	$1,515,391	2.28	$5,937,370	$327,807	18.11	$3,145,235	$7,213,462	0.44
Wattsmart Business	Food Service	$51,583	$29,290	1.76	$51,583	$61,137	0.84	$56,742	$61,137	0.93	$107,204	$67,361	1.59	$51,583	$119,168	0.43
Wattsmart Business	HVAC	$1,276,753	$1,232,115	1.04	$1,276,753	$2,334,976	0.55	$1,404,428	$2,334,976	0.60	$3,910,260	$2,824,981	1.38	$1,276,753	$4,183,000	0.31
Wattsmart Business	Lighting	$33,904,669	$34,649,558	0.98	$33,904,669	$54,916,252	0.62	$37,295,136	$54,916,252	0.68	$101,465,632	$65,134,067	1.56	$33,904,669	$108,834,015	0.31
Wattsmart Business	Refrigeration	$9,286	$4,354	2.13	$9,286	$18,625	0.50	$10,214	$18,625	0.55	$17,659	$23,399	0.75	$9,286	$19,202	0.48
Wattsmart Business	Water Heating	$90,250	$143,120	0.63	$90,250	$137,597	0.66	$99,275	$137,597	0.72	$339,767	$165,768	2.05	$90,250	$356,353	0.25
Wattsmart Business	Whole Building	$14,713,409	$12,536,126	1.17	$14,713,409	$11,635,976	1.26	$16,184,750	$11,635,976	1.39	$38,268,222	$12,986,618	2.95	$14,713,409	$40,423,966	0.36

EXHIBIT C

Memorandum

To: Nancy Goddard, Clay Monroe, Rocky Mountain Power

From: Eli Morris, Andy Hudson, Elizabeth Applegate, Julian Graybill Brubaker, ICF

Date: 23 May 2025

Re: Utah Wattsmart Business Program Cost-Effectiveness Analysis, High Case Participation – PY2025-2026

ICF estimated the cost-effectiveness of Rocky Mountain Power's Wattsmart Business Program in the state of Utah based on Program Year (PY) 2025 and 2026 costs and savings estimates developed by program implementation staff, reviewed by ICF, and finalized by Rocky Mountain Power. This memo provides cost-effectiveness results at the program level for the High (+10% from Base) participation case. The program passes the Utility Cost Test (UCT) and the Participant Cost Test (PCT) under these conditions.

This memo provides analysis inputs and results in the following tables:

- Table 1: Cost-Effectiveness Analysis Inputs
- Table 2: Annual Program Costs by Program Year, Nominal - PY2025-2026
- Table 3: Annual Savings in kWh by Program Year - PY2025-2026
- Table 4: Benefit/Cost Ratios by Program Year - PY2025-2026
- Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2025
- Table 6: Wattsmart Business Program Cost-Effectiveness Results, PY2026
- Table 7: Wattsmart Business Program Cost-Effectiveness Results, PY2025-2026
- Table 8: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2025
- Table 9: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2026
- Table 10: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2025
- Table 11: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2026
- Table 12: Wattsmart Business Whole Building New Construction Delivery Cost-Effectiveness Results, PY2025
- Table 13: Wattsmart Business Whole Building New Construction Delivery Cost-Effectiveness Results, PY2026
- Table 14: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2025
- Table 15: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2026

The following assumptions were utilized in the analysis:

- Avoided Costs: Hourly values provided by Rocky Mountain Power based on the 2023 Integrated Resource Plan (IRP) Preferred Portfolio, converted into annual values using Utah load shapes from the same IRP.
- Modeling Inputs: measure savings, costs, measure lives, incentive levels, program delivery, and portfolio costs were provided by Rocky Mountain Power.
- Other Economic Assumptions: Discount rate, line loss, retail rate, and inflation rate values were provided by Rocky Mountain Power and are presented in Table 1 below.

The following tables summarize cost-effectiveness assumptions and results for the Utah Wattsmart Business Program. Tables 1 through 3 below show the cost-effectiveness analysis inputs. Tables 4 through 13 present the cost-effectiveness results of the Wattsmart Business program for PY2025-PY2026 at the program and delivery channel levels. Tables 14 and 15 present results at the measure category level for PY2025-PY2026. All results are presented in 2025 dollars.[1]

Table 1: Cost-Effectiveness Analysis Inputs

Parameter	PY2025-PY2026
Discount Rate	6.77%
Commercial Line Loss	5.86%
Commercial Energy Rate ($/kWh)	$0.09
Inflation Rate[1]	2.27%

Table 2: Annual Program Costs by Program Year, Nominal - PY2025-PY2026

Program Year	Program Delivery	Utility Admin	Incentives	Total Utility Costs	Gross Customer Costs
2025	$6,650,973	$473,429	$27,906,588	$35,030,990	$40,230,459
2026	$11,455,637	$473,429	$45,958,599	$57,887,665	$70,131,493
2025-2026	$18,106,610	$946,858	$73,865,187	$92,918,655	$110,361,951

Table 3: Annual Savings in kWh by Program Year - PY2025-PY2026

Program Year	Gross kWh Savings at Site	Realization Rate	Adjusted Gross kWh Savings at Site	Net to Gross Ratio	Net kWh Savings at Site	Measure Life
2025	85,949,591	98%	84,521,838	73%	61,700,942	15
2026	144,463,854	98%	142,060,883	73%	103,704,445	14
2025-2026	230,413,445	98%	226,582,722	73%	165,405,387	14

Table 4: Benefit/Cost Ratios by Measure Category - PY2025-PY2026

Program Year	UCT	TRC	PTRC	PCT	RIM
2025	1.15	0.85	0.93	1.98	0.35
2026	1.09	0.77	0.85	1.85	0.33
2025-2026	1.11	0.80	0.88	1.90	0.34

[1] Future rates determined using a 2.27% annual escalator.

Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.058	$35,030,990	$40,176,364	$5,145,374	1.15
Total Resource Cost Test (TRC) No Adder	$0.078	$47,354,861	$40,176,364	($7,178,497)	0.85
Total Resource Cost Test (PTRC) + Conservation Adder	$0.078	$47,354,861	$44,194,000	($3,160,860)	0.93
Participant Cost Test (PCT)		$55,110,217	$109,280,438	$54,170,221	1.98
Rate Impact Test (RIM)		$116,404,840	$40,176,364	($76,228,477)	0.35
Lifecycle Revenue Impacts ($/kWh)					$0.00033

Table 6: Wattsmart Business Program Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.060	$54,217,163	$59,069,692	$4,852,529	1.09
Total Resource Cost Test (TRC) No Adder	$0.085	$76,857,318	$59,069,692	($17,787,627)	0.77
Total Resource Cost Test (PTRC) + Conservation Adder	$0.085	$76,857,318	$64,976,661	($11,880,657)	0.85
Participant Cost Test (PCT)		$89,978,962	$166,239,175	$76,260,213	1.85
Rate Impact Test (RIM)		$177,411,851	$59,069,692	($118,342,159)	0.33
Lifecycle Revenue Impacts ($/kWh)					$0.00052

Table 7: Wattsmart Business Program Cost-Effectiveness Results, PY2025-2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.060	$89,248,153	$99,246,055	$9,997,902	1.11
Total Resource Cost Test (TRC) No Adder	$0.082	$124,212,179	$99,246,055	($24,966,123)	0.80
Total Resource Cost Test (PTRC) + Conservation Adder	$0.082	$124,212,179	$109,170,661	($15,041,518)	0.88
Participant Cost Test (PCT)		$145,089,179	$275,519,613	$130,430,434	1.90
Rate Impact Test (RIM)		$293,816,691	$99,246,055	($194,570,636)	0.34
Lifecycle Revenue Impacts ($/kWh)					$0.00081

Table 8: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.055	$22,147,060	$25,617,605	$3,470,545	1.16
Total Resource Cost Test (TRC) No Adder	$0.093	$38,127,917	$25,617,605	($12,510,312)	0.67
Total Resource Cost Test (PTRC) + Conservation Adder	$0.093	$38,127,917	$28,179,366	($9,948,551)	0.74
Participant Cost Test (PCT)		$45,495,540	$71,466,270	$25,970,730	1.57
Rate Impact Test (RIM)		$76,382,443	$25,617,605	($50,764,837)	0.34
Lifecycle Revenue Impacts ($/kWh)					$0.00021

Table 9: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.060	$39,554,874	$41,734,765	$2,179,891	1.06
Total Resource Cost Test (TRC) No Adder	$0.094	$63,026,450	$41,734,765	($21,291,685)	0.66
Total Resource Cost Test (PTRC) + Conservation Adder	$0.094	$63,026,450	$45,908,242	($17,118,208)	0.73
Participant Cost Test (PCT)		$74,461,742	$121,115,102	$46,653,360	1.63
Rate Impact Test (RIM)		$129,784,480	$41,734,765	($88,049,715)	0.32
Lifecycle Revenue Impacts ($/kWh)					$0.00038

Table 10: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.143	$5,358,531	$2,432,306	($2,926,226)	0.45
Total Resource Cost Test (TRC) No Adder	$0.047	$1,738,081	$2,432,306	$694,224	1.40
Total Resource Cost Test (PTRC) + Conservation Adder	$0.047	$1,738,081	$2,675,536	$937,455	1.54
Participant Cost Test (PCT)		$1,666,958	$9,724,433	$8,057,475	5.83
Rate Impact Test (RIM)		$10,245,635	$2,432,306	($7,813,329)	0.24
Lifecycle Revenue Impacts ($/kWh)					$0.00004

Table 11: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.063	$1,058,375	$1,150,177	$91,801	1.09
Total Resource Cost Test (TRC) No Adder	$0.072	$1,217,121	$1,150,177	($66,944)	0.94
Total Resource Cost Test (PTRC) + Conservation Adder	$0.072	$1,217,121	$1,265,194	$48,074	1.04
Participant Cost Test (PCT)		$1,231,940	$3,029,029	$1,797,090	2.46
Rate Impact Test (RIM)		$3,346,834	$1,150,177	($2,196,657)	0.34
Lifecycle Revenue Impacts ($/kWh)					$0.00001

Table 12: Wattsmart Business Whole Building New Construction Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.047	$7,525,399	$12,126,453	$4,601,054	1.61
Total Resource Cost Test (TRC) No Adder	$0.047	$7,488,862	$12,126,453	$4,637,591	1.62
Total Resource Cost Test (PTRC) + Conservation Adder	$0.047	$7,488,862	$13,339,098	$5,850,236	1.78
Participant Cost Test (PCT)		$7,947,719	$28,089,736	$20,142,017	3.53
Rate Impact Test (RIM)		$29,776,763	$12,126,453	($17,650,310)	0.41
Lifecycle Revenue Impacts ($/kWh)					$0.00009

Table 13: Wattsmart Business Whole Building New Construction Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.063	$13,603,913	$16,184,750	$2,580,836	1.19
Total Resource Cost Test (TRC) No Adder	$0.059	$12,613,748	$16,184,750	$3,571,002	1.28
Total Resource Cost Test (PTRC) + Conservation Adder	$0.059	$12,613,748	$17,803,224	$5,189,477	1.41
Participant Cost Test (PCT)		$14,285,280	$42,095,044	$27,809,764	2.95
Rate Impact Test (RIM)		$44,280,537	$16,184,750	($28,095,788)	0.37
Lifecycle Revenue Impacts ($/kWh)					$0.00015

Table 14: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2025

Program	Measure Category	Utility Benefits ($)	Utility Costs ($)	Utility Cost Test	TRC Benefits ($)	TRC Costs ($)	TRC Test	P-TRC Benefits ($)	P-TRC Costs ($)	P-TRC Test	Participant PV Benefits ($)	Participant PV Costs ($)	PCT Test	Ratepayer PV Benefits ($)	Ratepayer PV Costs Costs ($)	RIM Test
Wattsmart Business	Appliances	$515	$333	1.55	$515	$990	0.52	$567	$990	0.57	$1,306	$1,201	1.09	$515	$1,419	0.36
Wattsmart Business	Building Shell	$362,715	$98,845	3.67	$362,715	$182,514	1.99	$398,987	$182,514	2.19	$741,898	$193,875	3.83	$362,715	$782,883	0.46
Wattsmart Business	Electronics	$42,638	$12,924	3.30	$42,638	$16,827	2.53	$46,901	$16,827	2.79	$78,832	$11,675	6.75	$42,638	$87,137	0.49
Wattsmart Business	Energy Management	$1,102,151	$494,347	2.23	$1,102,151	$481,456	2.29	$1,212,366	$481,456	2.52	$1,987,590	$113,974	17.44	$1,102,151	$2,385,845	0.46
Wattsmart Business	Food Service	$2,266	$5,097	0.44	$2,266	$6,692	0.34	$2,492	$6,692	0.37	$8,791	$8,665	1.01	$2,266	$9,158	0.25
Wattsmart Business	HVAC	$1,409,064	$1,266,310	1.11	$1,409,064	$2,577,166	0.55	$1,549,970	$2,577,166	0.60	$4,523,111	$3,112,567	1.45	$1,409,064	$4,828,103	0.29
Wattsmart Business	Lighting	$25,023,608	$25,544,102	0.98	$25,023,608	$36,522,034	0.69	$27,525,969	$36,522,034	0.75	$73,458,153	$43,525,523	1.69	$25,023,608	$78,206,555	0.32
Wattsmart Business	Refrigeration	$907	$413	2.20	$907	$1,810	0.50	$998	$1,810	0.55	$1,696	$2,290	0.74	$907	$1,834	0.49
Wattsmart Business	Water Heating	$106,046	$164,962	0.64	$106,046	$158,253	0.67	$116,651	$158,253	0.74	$389,324	$192,728	2.02	$106,046	$406,886	0.26
Wattsmart Business	Whole Building	$12,126,453	$7,443,657	1.63	$12,126,453	$7,407,120	1.64	$13,339,098	$7,407,120	1.80	$28,089,736	$7,947,719	3.53	$12,126,453	$29,695,020	0.41

Table 15: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2026

Program	Measure Category	Utility Benefits ($)	Utility Costs ($)	Utility Cost Test	TRC Benefits ($)	TRC Costs ($)	TRC Test	P-TRC Benefits ($)	P-TRC Costs ($)	P-TRC Test	Participant PV Benefits ($)	Participant PV Costs ($)	PCT Test	Ratepayer PV Benefits ($)	Ratepayer PV Costs Costs ($)	RIM Test
Wattsmart Business	Appliances	$620	$371	1.67	$620	$1,026	0.60	$682	$1,026	0.66	$1,604	$1,216	1.32	$620	$1,743	0.36
Wattsmart Business	Building Shell	$500,633	$140,587	3.56	$500,633	$258,015	1.94	$550,696	$258,015	2.13	$1,072,931	$274,047	3.92	$500,633	$1,130,891	0.44
Wattsmart Business	Electronics	$58,136	$19,715	2.95	$58,136	$26,634	2.18	$63,949	$26,634	2.40	$113,915	$20,698	5.50	$58,136	$125,439	0.46
Wattsmart Business	Energy Management	$3,459,759	$1,585,167	2.18	$3,459,759	$1,539,321	2.25	$3,805,735	$1,539,321	2.47	$6,531,107	$360,588	18.11	$3,459,759	$7,807,199	0.44
Wattsmart Business	Food Service	$56,742	$31,023	1.83	$56,742	$66,054	0.86	$62,416	$66,054	0.94	$117,925	$74,097	1.59	$56,742	$129,888	0.44
Wattsmart Business	HVAC	$1,404,428	$1,328,052	1.06	$1,404,428	$2,541,199	0.55	$1,544,871	$2,541,199	0.61	$4,301,286	$3,107,479	1.38	$1,404,428	$4,574,026	0.31
Wattsmart Business	Lighting	$37,295,136	$37,377,676	1.00	$37,295,136	$59,671,039	0.63	$41,024,649	$59,671,039	0.69	$111,612,195	$71,647,473	1.56	$37,295,136	$118,980,578	0.31
Wattsmart Business	Refrigeration	$10,214	$4,634	2.20	$10,214	$20,333	0.50	$11,236	$20,333	0.55	$19,425	$25,739	0.75	$10,214	$20,968	0.49
Wattsmart Business	Water Heating	$99,275	$155,773	0.64	$99,275	$149,698	0.66	$109,203	$149,698	0.73	$373,743	$182,345	2.05	$99,275	$390,329	0.25
Wattsmart Business	Whole Building	$16,184,750	$13,574,164	1.19	$16,184,750	$12,583,999	1.29	$17,803,224	$12,583,999	1.41	$42,095,044	$14,285,280	2.95	$16,184,750	$44,250,789	0.37

EXHIBIT D

Memorandum

To: Nancy Goddard, Clay Monroe, Rocky Mountain Power

From: Eli Morris, Andy Hudson, Elizabeth Applegate, Julian Graybill Brubaker, ICF

Date: 23 May 2025

Re: Utah Wattsmart Business Program Cost-Effectiveness Analysis, Low Case Participation – PY2025-2026

ICF estimated the cost-effectiveness of Rocky Mountain Power's Wattsmart Business Program in the state of Utah based on Program Year (PY) 2025 and 2026 costs and savings estimates developed by program implementation staff, reviewed by ICF, and finalized by Rocky Mountain Power. This memo provides cost-effectiveness results at the program level for the Low (-10% from Base) participation case. The program passes the Utility Cost Test (UCT) and the Participant Cost Test (PCT) under these conditions.

This memo provides analysis inputs and results in the following tables:

- Table 1: Cost-Effectiveness Analysis Inputs
- Table 2: Annual Program Costs by Program Year, Nominal - PY2025-2026
- Table 3: Annual Savings in kWh by Program Year - PY2025-2026
- Table 4: Benefit/Cost Ratios by Program Year - PY2025-2026
- Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2025
- Table 6: Wattsmart Business Program Cost-Effectiveness Results, PY2026
- Table 7: Wattsmart Business Program Cost-Effectiveness Results, PY2025-2026
- Table 8: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2025
- Table 9: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2026
- Table 10: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2025
- Table 11: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2026
- Table 12: Wattsmart Business Whole Building New Construction Delivery Cost-Effectiveness Results, PY2025
- Table 13: Wattsmart Business Whole Building New Construction Delivery Cost-Effectiveness Results, PY2026
- Table 14: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2025
- Table 15: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2026

The following assumptions were utilized in the analysis:

- Avoided Costs: Hourly values provided by Rocky Mountain Power based on the 2023 Integrated Resource Plan (IRP) Preferred Portfolio, converted into annual values using Utah load shapes from the same IRP.
- Modeling Inputs: measure savings, costs, measure lives, incentive levels, program delivery, and portfolio costs were provided by Rocky Mountain Power.
- Other Economic Assumptions: Discount rate, line loss, retail rate, and inflation rate values were provided by Rocky Mountain Power and are presented in Table 1 below.

The following tables summarize cost-effectiveness assumptions and results for the Utah Wattsmart Business Program. Tables 1 through 3 below show the cost-effectiveness analysis inputs. Tables 4 through 13 present the cost-effectiveness results of the Wattsmart Business program for PY2025-PY2026 at the program and delivery channel levels. Tables 14 and 15 present results at the measure category level for PY2025-PY2026. All results are presented in 2025 dollars.[1]

Table 1: Cost-Effectiveness Analysis Inputs

Parameter	PY2025-PY2026
Discount Rate	6.77%
Commercial Line Loss	5.86%
Commercial Energy Rate ($/kWh)	$0.09
Inflation Rate[1]	2.27%

Table 2: Annual Program Costs by Program Year, Nominal - PY2025-PY2026

Program Year	Program Delivery	Utility Admin	Incentives	Total Utility Costs	Gross Customer Costs
2025	$6,650,973	$473,429	$22,832,663	$29,957,065	$32,915,830
2026	$11,455,637	$473,429	$37,602,490	$49,531,556	$57,380,312
2025-2026	$18,106,610	$946,858	$60,435,153	$79,488,621	$90,296,142

Table 3: Annual Savings in kWh by Program Year - PY2025-PY2026

Program Year	Gross kWh Savings at Site	Realization Rate	Adjusted Gross kWh Savings at Site	Net to Gross Ratio	Net kWh Savings at Site	Measure Life
2025	70,322,393	98%	69,154,231	73%	50,482,589	15
2026	118,197,699	98%	116,231,632	73%	84,849,091	14
2025-2026	188,520,092	98%	185,385,863	73%	135,331,680	14

Table 4: Benefit/Cost Ratios by Measure Category - PY2025-PY2026

Program Year	UCT	TRC	PTRC	PCT	RIM
2025	1.10	0.82	0.90	1.98	0.34
2026	1.04	0.74	0.82	1.85	0.33
2025-2026	1.06	0.77	0.85	1.90	0.33

[1] Future rates determined using a 2.27% annual escalator.

Table 5: Wattsmart Business Program Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.058	$29,957,065	$32,871,570	$2,914,505	1.10
Total Resource Cost Test (TRC) No Adder	$0.078	$40,040,232	$32,871,570	($7,168,661)	0.82
Total Resource Cost Test (PTRC) + Conservation Adder	$0.078	$40,040,232	$36,158,727	($3,881,504)	0.90
Participant Cost Test (PCT)		$45,090,178	$89,411,268	$44,321,090	1.98
Rate Impact Test (RIM)		$96,535,670	$32,871,570	($63,664,099)	0.34
Lifecycle Revenue Impacts ($/kWh)					$0.00033

Table 6: Wattsmart Business Program Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.060	$46,390,892	$48,329,748	$1,938,855	1.04
Total Resource Cost Test (TRC) No Adder	$0.085	$64,914,656	$48,329,748	($16,584,908)	0.74
Total Resource Cost Test (PTRC) + Conservation Adder	$0.085	$64,914,656	$53,162,722	($11,751,933)	0.82
Participant Cost Test (PCT)		$73,619,151	$136,013,870	$62,394,720	1.85
Rate Impact Test (RIM)		$147,186,546	$48,329,748	($98,856,799)	0.33
Lifecycle Revenue Impacts ($/kWh)					$0.00052

Table 7: Wattsmart Business Program Cost-Effectiveness Results, PY2025-2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.060	$76,347,958	$81,201,318	$4,853,361	1.06
Total Resource Cost Test (TRC) No Adder	$0.082	$104,954,888	$81,201,318	($23,753,570)	0.77
Total Resource Cost Test (PTRC) + Conservation Adder	$0.082	$104,954,888	$89,321,450	($15,633,438)	0.85
Participant Cost Test (PCT)		$118,709,329	$225,425,138	$106,715,810	1.90
Rate Impact Test (RIM)		$243,722,216	$81,201,318	($162,520,898)	0.33
Lifecycle Revenue Impacts ($/kWh)					$0.00081

Table 8: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.055	$19,014,171	$20,959,859	$1,945,688	1.10
Total Resource Cost Test (TRC) No Adder	$0.093	$32,089,418	$20,959,859	($11,129,559)	0.65
Total Resource Cost Test (PTRC) + Conservation Adder	$0.093	$32,089,418	$23,055,845	($9,033,574)	0.72
Participant Cost Test (PCT)		$37,223,624	$58,472,402	$21,248,779	1.57
Rate Impact Test (RIM)		$63,388,575	$20,959,859	($42,428,717)	0.33
Lifecycle Revenue Impacts ($/kWh)					$0.00021

Table 9: Wattsmart Business C&I Delivery Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.060	$33,939,330	$34,146,626	$207,297	1.01
Total Resource Cost Test (TRC) No Adder	$0.094	$53,143,346	$34,146,626	($18,996,720)	0.64
Total Resource Cost Test (PTRC) + Conservation Adder	$0.094	$53,143,346	$37,561,289	($15,582,057)	0.71
Participant Cost Test (PCT)		$60,923,244	$99,094,174	$38,170,931	1.63
Rate Impact Test (RIM)		$107,763,552	$34,146,626	($73,616,926)	0.32
Lifecycle Revenue Impacts ($/kWh)					$0.00038

Table 10: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.143	$4,479,017	$1,990,068	($2,488,949)	0.44
Total Resource Cost Test (TRC) No Adder	$0.047	$1,516,831	$1,990,068	$473,238	1.31
Total Resource Cost Test (PTRC) + Conservation Adder	$0.047	$1,516,831	$2,189,075	$672,245	1.44
Participant Cost Test (PCT)		$1,363,875	$7,956,354	$6,592,479	5.83
Rate Impact Test (RIM)		$8,477,556	$1,990,068	($6,487,488)	0.23
Lifecycle Revenue Impacts ($/kWh)					$0.00004

Table 11: Wattsmart Business Midstream Delivery Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.063	$923,726	$941,054	$17,327	1.02
Total Resource Cost Test (TRC) No Adder	$0.072	$1,053,609	$941,054	($112,555)	0.89
Total Resource Cost Test (PTRC) + Conservation Adder	$0.072	$1,053,609	$1,035,159	($18,449)	0.98
Participant Cost Test (PCT)		$1,007,951	$2,478,297	$1,470,346	2.46
Rate Impact Test (RIM)		$2,796,101	$941,054	($1,855,048)	0.34
Lifecycle Revenue Impacts ($/kWh)					$0.00001

Table 12: Wattsmart Business Whole Building New Construction Cost-Effectiveness Results, PY2025

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.047	$6,463,877	$9,921,643	$3,457,766	1.53
Total Resource Cost Test (TRC) No Adder	$0.047	$6,433,983	$9,921,643	$3,487,660	1.54
Total Resource Cost Test (PTRC) + Conservation Adder	$0.047	$6,433,983	$10,913,808	$4,479,825	1.70
Participant Cost Test (PCT)		$6,502,679	$22,982,511	$16,479,832	3.53
Rate Impact Test (RIM)		$24,669,538	$9,921,643	($14,747,895)	0.40
Lifecycle Revenue Impacts ($/kWh)					$0.00009

Table 13: Wattsmart Business Whole Building New Construction Cost-Effectiveness Results, PY2026

Cost-Effectiveness Test	Levelized $/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	$0.063	$11,527,837	$13,242,068	$1,714,231	1.15
Total Resource Cost Test (TRC) No Adder	$0.059	$10,717,701	$13,242,068	$2,524,366	1.24
Total Resource Cost Test (PTRC) + Conservation Adder	$0.059	$10,717,701	$14,566,275	$3,848,573	1.36
Participant Cost Test (PCT)		$11,687,957	$34,441,400	$22,753,443	2.95
Rate Impact Test (RIM)		$36,626,893	$13,242,068	($23,384,825)	0.36
Lifecycle Revenue Impacts ($/kWh)					$0.00015

Table 14: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2025

Program	Measure Category	Utility Benefits ($)	Utility Costs ($)	Utility Cost Test	TRC Benefits ($)	TRC Costs ($)	TRC Test	P-TRC Benefits ($)	P-TRC Costs ($)	P-TRC Test	Participant PV Benefits ($)	Participant PV Costs ($)	PCT Test	Ratepayer PV Benefits ($)	Ratepayer PV Costs Costs ($)	RIM Test
Wattsmart Business	Appliances	$422	$293	1.44	$422	$830	0.51	$464	$830	0.56	$1,069	$983	1.09	$422	$1,182	0.36
Wattsmart Business	Building Shell	$296,767	$88,325	3.36	$296,767	$156,781	1.89	$326,444	$156,781	2.08	$607,008	$158,625	3.83	$296,767	$647,993	0.46
Wattsmart Business	Electronics	$34,885	$12,084	2.89	$34,885	$15,278	2.28	$38,374	$15,278	2.51	$64,499	$9,552	6.75	$34,885	$72,803	0.48
Wattsmart Business	Energy Management	$901,760	$476,876	1.89	$901,760	$466,328	1.93	$991,936	$466,328	2.13	$1,626,210	$93,251	17.44	$901,760	$2,024,465	0.45
Wattsmart Business	Food Service	$1,854	$4,237	0.44	$1,854	$5,542	0.33	$2,039	$5,542	0.37	$7,193	$7,089	1.01	$1,854	$7,560	0.25
Wattsmart Business	HVAC	$1,152,871	$1,091,525	1.06	$1,152,871	$2,164,043	0.53	$1,268,158	$2,164,043	0.59	$3,700,727	$2,546,646	1.45	$1,152,871	$4,005,719	0.29
Wattsmart Business	Lighting	$20,473,861	$21,763,066	0.94	$20,473,861	$30,745,010	0.67	$22,521,247	$30,745,010	0.73	$60,102,126	$35,611,792	1.69	$20,473,861	$64,850,527	0.32
Wattsmart Business	Refrigeration	$742	$363	2.05	$742	$1,506	0.49	$816	$1,506	0.54	$1,388	$1,874	0.74	$742	$1,526	0.49
Wattsmart Business	Water Heating	$86,765	$138,162	0.63	$86,765	$132,673	0.65	$95,442	$132,673	0.72	$318,538	$157,686	2.02	$86,765	$336,100	0.26
Wattsmart Business	Whole Building	$9,921,643	$6,382,134	1.55	$9,921,643	$6,352,240	1.56	$10,913,808	$6,352,240	1.72	$22,982,511	$6,502,679	3.53	$9,921,643	$24,587,796	0.40

Table 15: Wattsmart Business Measure Category Level Cost-Effectiveness Results, PY2026

Program	Measure Category	Utility Benefits ($)	Utility Costs ($)	Utility Cost Test	TRC Benefits ($)	TRC Costs ($)	TRC Test	P-TRC Benefits ($)	P-TRC Costs ($)	P-TRC Test	Participant PV Benefits ($)	Participant PV Costs ($)	PCT Test	Ratepayer PV Benefits ($)	Ratepayer PV Costs Costs ($)	RIM Test
Wattsmart Business	Appliances	$507	$328	1.54	$507	$865	0.59	$558	$865	0.64	$1,312	$995	1.32	$507	$1,451	0.35
Wattsmart Business	Building Shell	$409,608	$125,564	3.26	$409,608	$221,641	1.85	$450,569	$221,641	2.03	$877,852	$224,220	3.92	$409,608	$935,813	0.44
Wattsmart Business	Electronics	$47,565	$18,225	2.61	$47,565	$23,886	1.99	$52,322	$23,886	2.19	$93,203	$16,935	5.50	$47,565	$104,727	0.45
Wattsmart Business	Energy Management	$2,830,712	$1,528,972	1.85	$2,830,712	$1,491,461	1.90	$3,113,783	$1,491,461	2.09	$5,343,633	$295,027	18.11	$2,830,712	$6,619,725	0.43
Wattsmart Business	Food Service	$46,425	$27,558	1.68	$46,425	$56,219	0.83	$51,067	$56,219	0.91	$96,484	$60,625	1.59	$46,425	$108,447	0.43
Wattsmart Business	HVAC	$1,149,078	$1,136,177	1.01	$1,149,078	$2,128,752	0.54	$1,263,986	$2,128,752	0.59	$3,519,234	$2,542,483	1.38	$1,149,078	$3,791,974	0.30
Wattsmart Business	Lighting	$30,514,202	$31,921,441	0.96	$30,514,202	$50,161,465	0.61	$33,565,622	$50,161,465	0.67	$91,319,068	$58,620,660	1.56	$30,514,202	$98,687,452	0.31
Wattsmart Business	Refrigeration	$8,357	$4,073	2.05	$8,357	$16,917	0.49	$9,193	$16,917	0.54	$15,893	$21,059	0.75	$8,357	$17,437	0.48
Wattsmart Business	Water Heating	$81,225	$130,466	0.62	$81,225	$125,496	0.65	$89,348	$125,496	0.71	$305,790	$149,191	2.05	$81,225	$322,376	0.25
Wattsmart Business	Whole Building	$13,242,068	$11,498,088	1.15	$13,242,068	$10,687,953	1.24	$14,566,275	$10,687,953	1.36	$34,441,400	$11,687,957	2.95	$13,242,068	$36,597,144	0.36