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*Attorney for Dominion Energy*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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IN THE MATTER OF DOMINION	)	
ENERGY UTAH’S APPLICATION FOR	)	
APPROVAL OF THE 2020 YEAR BUDGET	)	Docket No. 19-057-26 & 20-057-01
FOR ENERGY EFFICIENCY PROGRAMS	)	
AND MARKET TRANSFORMATION	)	DOMINION ENERGY UTAH’S
INITIATIVE AND, DOMINION ENERGY	)	REPLY COMMENTS
UTAH’S EFFICIENCY REPORTS 2020	)	

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Pursuant to the Utah Public Service Commission’s (Commission) Notice of Comment Period dated January 8, 2021, Dominion Energy Utah (Dominion Energy, DEU or Company) respectfully submits these Reply Comments. The comments below address issues raised by the Utah Division of Public Utilities (Division) in its Action Request Response dated December 30, 2020 (Division’s Comments).

**I. BACKGROUND**

On December 2, 2020, the Company filed its Report on Energy Efficiency Expenditures and Decatherm Savings to Date (Report) with the Commission. In that Report, the Company indicated that the ThermWise® Builder Program had reached ninety-six percent (96.2%) of its 2020 approved budget. The Commission issued an Action Request directing

the Division to review the filing for compliance and make recommendations by December 31, 2020. On December 30, 2020, the Division filed its Action Request Response stating that the Company had met its reporting requirements. The Division recommended that the Commission acknowledge the higher level of spending at the forecasted levels for the ThermWise® Builder Program and the ThermWise® Weatherization Program, and reduce the spending in the Appliance Program, Home Energy Plan program, and Market Transformation program to the forecasted levels (\$3,656,946 for the ThermWise® Appliance Program; \$343,965 for the ThermWise® Home Energy Plan; and \$1,081,712 for the Market Transformation budget). Finally, the Division recommended that the Commission require the Company to submit its Energy Efficiency Reports, both the quarterly actual and projected budget exceedance reports, within 45 days after the period end date.

## **II. DISCUSSION**

The Company agrees with the Division's recommendation that the Company be required to submit projected budget exceedance reports within 45 days of the end of each quarter. The Company has communicated support of this recommendation to the Division and is currently taking the actions necessary to ensure reports are submitted to the appropriate parties within 45 days after the end of a period.

The Company does not agree that the Commission should reduce the budget of any ThermWise® program in 2020. Though the Company expects the total 2020 expenditures to fall within the limits recommended by the Division, it opposes any recommendation or precedent that would reduce the spending in any ThermWise® Program budget mid-year. In the fourteen-year history of the ThermWise® programs, the Commission has not reduced, during a given year, budget levels for any individual program nor the overall ThermWise®

suite of programs. To do so could have unintended consequences if more qualified customers applied for rebates than the newly-reduced budget permits. Doing so could also create confusion in the market and with customers. The Company acknowledges, as the Division has, that the Company's year-end 2020 spending forecasts for the Appliance, Home Energy Plan, and Market Transformation programs is lower than previously anticipated and may well fall within the limits recommended by the Division. However, instead of a budget adjustment, the Company proposes to work with the Division and to provide further clarification on this issue in 2021.

### **III. CONCLUSION**

The Company appreciates the Division's input and recommendations and its collaboration on these issues. The Company respectfully requests that the Commission acknowledge the higher level of spending at the forecasted levels for the ThermWise® Builder and Weatherization programs, as recommended by the Division. The Company also supports an order establishing deadline for reporting at the end of a period end date be established as more fully set forth in the Division's Comments.

DATED this 15th day of January 2021.

Respectfully submitted,

DOMINION ENERGY UTAH



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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of Dominion Energy Utah’s Reply Comments was served upon the following by electronic mail on January 15, 2021:

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/s/ Ginger Johnson