

## Before the Public Service Commission of Utah

In the matter of the consideration of the amendment of Title 16 U.S.C. 2621(d) and the addition of Title 42 U.S.C. 6344 by the U.S. Energy Independence and Security Act of 2007 “Consideration of smart grid investments” and “Smart grid information”

Docket  
Number 08-  
999-05

### Comments of Enerlyte, LLC

Submitted May 09, 2011

#### Summary of Position with regards to Docket Number 08-999-05

- Current path to adopt “Home Energy Reports” does not include a true sample of ALL Rocky Mountain Power electric consumers. The sample group to receive energy reports in Enerlyte’s opinion should reflect a true cross section and sample of customers. This approach will provide a potential path towards a fully scalable product and valid solution going forward.

- Cost of home energy reports as indicated in the Rocky Mountain Power provided “Review of “Home Energy Reports”, Docket No. 08-999-05, February 28, 2011” reflects an average of \$1.05 to \$1.18 per participating customer per month for 3 years. This cost is based on technology and methods of deployment that are more than two years old. Enerlyte is confident in our ability to provide a superior home energy reporting product and more complete total solution for a 50% to 75% lower cost than referenced in the review.

-Technology and behavior based demand-side management programs have evolved and progressed rapidly over the last two years. In Enerlyte’s opinion it would be in the best interest of Rocky Mountain Power, Rocky Mountain Power’s customers and the commission for Rocky Mountain Power to issue a new RFP for this type of energy report program. This would allow the current best solution to be deployed, and not what appeared to be the best solution more than two years ago.

#### Introduction

Enerlyte, LLC a Utah based advanced analytics company appreciates the opportunity to comment in the above matter. Enerlyte specializes in providing “Intelligent Conservation” demand-side management software solutions and services directly to electric and natural gas utilities. The catalyst for Enerlyte’s utility software solutions and the subsequent founding of Enerlyte was a research project conducted at Brigham Young University’s Marriott School of Business. The project and project team was led by Mr. Seth Phillips a member of the School’s entrepreneurship program. As part of their research Mr. Phillips and his team interviewed members of Utah’s Public Service Commission, Demand-Side Management utility executives at Questar Gas, Rocky Mountain Power and multiple Utah based municipal utilities. Mr. Phillips and Sam Steele began commercializing the research and officially founded Enerlyte in March of

2010.

### **Results of Research**

Research indicated significant areas of lacking including:

- relevant, timely and actionable DSM program performance feedback to DSM program leadership teams.
- affordable, effective and persistent yet dynamic customer engagement methods that include “all” customers.

These areas of lacking appeared to negatively impact base and peak load reduction goals including:

- the potential for increasing the adoption of energy efficiency and demand response products and programs.
- delivering predictable and persistent changes in customer behavior and energy usage.
- the inability to leverage DSM program portfolios for true market transformation.

Enerlyte appreciates Rocky Mountain Power’s willingness to pursue the possibility of making of a “home energy report” type product available to some of their customers. Enerlyte is in general agreement with Rocky Mountain’s Powers position as stated in the previously provided to the commission “Summary of Home Energy Reports, Docket No. 08-999-05, April 30, 2010” that “Home energy reports are an emerging market with existing players rapidly adding new features and many new entrants attracted to the market. The market is evolving and changing quickly”.

Enerlyte is of the position that in fact the home energy reports market has dramatically and further changed since April of 2010. In fact many of the companies listed in the April 30, 2010 summary report no longer exist in the same form, were acquired and/or merged with other companies and other market leaders including Enerlyte have emerged since the creation of that list. Further, Rocky Mountain Power states in the commission provided “Review of “Home Energy Reports”, Docket No. 08-999-05, February 28, 2011” that “...to allow the Company sufficient time to complete an ongoing evaluation of a Home Comparison Report product received through a competitively bid request for a proposal”.

Enerlyte believes that the competitive bid process to which Rocky Mountain Power refers is the Rocky Mountain Power 2008 Demand Side Resource RFP. Enerlyte believes that vendor proposals related to the 2008 RFP were due on January 23, 2009. Enerlyte believes that any information, pricing, capabilities, features, products and proposals received from prospective vendors at that time would no longer be relevant or valid given that more than two years of time has passed.

Since 2009 the Enerlyte suite of products has been fully developed and has since been deployed on multiple Utah municipal utilities and is in negotiation for additional deployments on several larger regional utilities. Although Enerlyte's product suite includes a "home energy report" product, Enerlyte's capabilities go far beyond home energy reports. For example Enerlyte provides analytical data and direct statistical feedback to utility DSM teams on the performance of new and existing DSM programs. These solutions are delivered with speed, accuracy and affordability unprecedented in the utility industry. Enerlyte's implementation and systems integration solutions are optimized and refined to require minimal utility DSM and IS&T resources for program start-up and ongoing internal staff support. Rather, utility DSM staff resources are optimized in a new pro-active and more meaningful way resulting in improved overall DSM program effectiveness.

Enerlyte respectfully requests that the commission support Rocky Mountain Power in the pursuit of:

- the most feature rich, affordable and cost effective energy analytics and reporting product solution available today.
- Rocky Mountain Power issuing a new RFP for the sole and exclusive purpose of obtaining proposals from qualified behavior/market change vendors available in today's marketplace.
- a small scale deployment and demonstration project approach that would sized to be a statistically representative sample of all customers. By creating representative sample size upon completion and positive validation of the project, the project could be ramped up with confidence to a "full-scale" program that includes "100%" of all Rocky Mountain Powers customers.
- a product and system integration solution that requires the least amount of utility internal DSM and IS&T start-up and on-going project support.

### **Enerlyte Conclusions**

Enerlyte believes that to truly transform customer usage and behavior, each customer should have the opportunity to be engaged. And as the sharing of information with that customer becomes more specific to their household and includes actionable and meaningful feedback, customers behavior will change, improve and exceed energy reduction objectives and expectations going forward. Also, as utility DSM leaders are able to make improvements and corrections to programs, better and more predictable cost effective results will be realized.

Enerlyte believes that its current technology if deployed on Rocky Mountain Power's service territory would result in measurable reductions in individual customer energy use. Enerlyte's overall savings are anticipated to grow year over year as the market transforms. Initial period Enerlyte savings estimates suggest savings for an average customer in the range of 1-3%. Savings over a six to nine year period are anticipated to be in the range of 7 to 10%.

Enerlyte would appreciate the opportunity to respond to a new and specific “Energy Reports” RFP issued by Rocky Mountain Power. Further, Enerlyte expresses the willingness and desire to meet upon request with the commission, commission staff and/or the DSM Advisory Group to present the Enerlyte suite of products, features and benefits.

Sincerely,

Seth Phillips  
CEO

Enerlyte, LLC  
2989 W Maple Loop Dr  
Lehi, Utah 84043  
P- (801) 557-3784  
E- [seth@enerlyte.com](mailto:seth@enerlyte.com)  
W- [www.enerlyte.com](http://www.enerlyte.com)