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Salt Lake City, Utah 84116

March 22, 2019

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: Advice No. 19-06
Proposed Changes to Schedule 114, Cool Keeper Program
Docket No. 19-035-T05

Enclosed for electronic filing are the proposed tariff sheets associated with Tariff P.S.C.U. No. 50 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 April 22, 2019 for these changes.

Second Revision of Sheet No. 114.1	Schedule 114	Cool Keeper Program
Second Revision of Sheet No. 114.2	Schedule 114	Cool Keeper Program

The purpose of this filing is to propose changes to the Cool Keeper Program (“Program”) administered through Electric Service Schedule No. 114, specifically to update the structure of the tariff to be an umbrella tariff for demand response offerings, add Schedule 2E as an applicable rate schedule, extend the dispatch period and hours, increase incentives, and change the current incentive structure for customers. These tariff changes align with the targets illustrated in Figure 1 below, filed in the Demand Side management November 1st Deferred Account and Forecast Report on November 1, 2018, in Docket No. 18-035-27. Proposed changes to the Schedule 114 tariff sheets are included as Exhibit A.

Figure 1 – 2019 Budget and Savings Forecast from Nov 1st Report

***	2019 MW Savings Forecast	2019 Budget Forecast
Load Control Program	115	\$6,300,000

Description of Changes

Proposed adjustments are listed below, with further explanation provided in subsequent sections.

1. Change the structure of the tariff to be an umbrella tariff for demand response offerings;
2. Add Schedule 2E as an applicable rate schedule;
3. Extend the dispatch period and hours; and
4. Increase incentives and change the incentive structure.

Tariff Structure

The current tariff only pertains to the Cool Keeper Program. It is proposed to change the name to “Load Management Program” to serve as an umbrella tariff for demand response offerings in general and not just Cool Keeper. No offerings beyond the Cool Keeper Program are being proposed at this time, but the proposed tariff structure will be set up to allow for the addition of future demand response offerings. Any proposed offerings to be added to Schedule 114 will be proposed in subsequent filings.

Applicable Rate Schedules

Schedule 2E was approved by the Commission in Docket No. 16-035-36 and should be added as an applicable rate schedule for demand response offerings.

Dispatch Period

The current dispatch period for Schedule 114 is June 1st through August 31st annually. It is proposed to extend the dispatch period to May 1st through September 30th to utilize the program when air conditioning is contributing to overall system load. It is also proposed to extend the available dispatch hours one additional hour at night from 8:00pm to 9:00pm Mountain Time. As renewable energy becomes a larger percentage of PacifiCorp’s generation portfolio, there may be a need and benefit to utilize demand response later in the evening. Additional language is also being added to clarify and define when emergency events may be used to satisfy requirements of the North America Electric Reliability Corporation standard for Contingency Reserve Obligation and may be deployed when the Company is experiencing a qualifying event as defined by the Northwest Power Pool. The Company is proactively designing this load management program to maximize value to customers and the Company. These changes will position the Company to more effectively utilize load control resources with minimal customer impact.

Incentive Structure

The current incentive table in Schedule 114 is set up for the Cool Keeper Program. It has been modified (see table below) to align with the proposed tariff structure and allow for other demand response offerings to be added.

Load Management Program	Participating Equipment	Maximum Incentive "up to"	Initially Offered Incentive
Cool Keeper	Air Conditioners – Level 1	\$40 annually	\$30
	Air Conditioners – Level 2	\$80 annually	\$60

Level 1 and Level 2 parameters pertain to the load output of air conditioning units. Currently, Level 1 is defined as $\leq 65,000$ Btu/hr (≤ 5.4 tons), and Level 2 is defined as $> 65,000$ Btu/hr $\leq 180,000$ Btu/hr (> 5.4 tons and ≤ 15 tons). These parameters will be maintained on the Company's website, and will be updated as necessary to align with equipment standards. The maximum "up to" incentives will be set at \$40 and \$80 for Level 1 and Level 2, respectively, with the initially offered incentives starting at \$30 and \$60 for Level 1 and Level 2, respectively. The initially offered incentive amounts will be a 50 percent increase from the current incentives.

Currently, participating customers receive their incentive as a one-time bill credit on their November billing statement. With this new incentive structure, customers will receive a monthly credit for each month of program participation. Customers may opt out of two or less called events and receive a prorated bill credit for those months, however any customers who opt out of more than two called events are automatically unenrolled from the Program.

Monthly bill credits for participating customers will be calculated based on the number of participating days on a customer's billing cycle, generally crediting \$0.20 for each day of participation. The Company currently has 21 different customer billing cycles, which will cause customers' bills for the first and last month of participation to be credited varied amounts, but will ultimately add up to the correct total. For example, a customer's billing cycle could be from 4/4/2019 to 5/3/2019, giving them 3 days of participation during the front end of the proposed dispatch period. The billing system should credit that customer's bill \$0.60 in this scenario. Then, the same customer's billing cycle on the back end of the proposed dispatch period would be 9/4/2019 to 10/3/2019, giving them 27 days of participation. The billing system would credit that customer's bill \$5.40 in this scenario. The accumulative bill credit total of the first the last billing cycle within the dispatch period would be \$6.00. For the four billing cycles occurring completely within the proposed dispatch period, the same customer would see an exact \$6.00 monthly bill credit. The accumulative total for all bill credits for this customer would be \$30.00, the proposed incentive offer amount for Level 1 equipment. The same general calculation logic of \$0.20 cents per day would ensue for all customer billing cycles. Level 2 equipment would generally be \$0.40 cents per day to accumulate to the proposed incentive amount of \$60.00 for level 2 equipment.

However, due to system limitations and the 30 versus 31 day per month variance, some customer billing cycles will experience rounding calculations, resulting in some days being counted for \$0.21 cents, which could ultimately yield a total bill credit amount of \$30.02 or \$30.14, for two examples. The average customer bill credit is anticipated to be \$30.08 due to the billing system's limitations. The Company feels that so long as every participating customer gets at least the offered incentive amount through bill credits, it is permissible to allow some customer billing cycles to receive some additional cents on their bill credits. By providing monthly bill credits during the dispatch period when customers' bills are higher, the Company believes the Program will have increased awareness and increased customer satisfaction.

Stakeholder Involvement

On October 30, 2018 and February 12, 2019, the Company met with the DSM Steering Committee to discuss Program updates and proposed changes in this filing. On March 8, 2019, a draft advice letter for these changes was shared with Steering Committee members requesting initial feedback and concerns prior to submitting. A call was held March 20, 2019, to address questions from Steering Committee members. It is the Company’s understanding that no pending or anticipated disputes in need of resolution have been raised about these proposed changes as of the date of this filing.

Cost Effectiveness

The cost-effective analysis for the Cool Keeper program is attached hereto as Confidential Exhibit B, and was based on the maximum “up to” incentive levels. As decrement values / avoided costs are considered confidential on load control programs, the cost-effectiveness results are provided below with a “pass” designation, which equates to a benefit to cost ratio of 1.0 or better. Sensitivity analyses for the Cool Keeper program are also included as Confidential Exhibits C and D. The Cool Keeper program is expected to remain cost-effective from the Utility Cost Test perspective under all scenarios.

Table 1
Cool Keeper Program Level Cost-Effectiveness Results – Expected Participation

Benefit/Cost Test	Benefit/Cost Ratio
PTRC	Pass
TRC	Pass
UCT	Pass
PCT	N/A
RIM	Pass

In addition to the aforementioned filing materials, enclosed with this Advice Letter is the Confidential Information Certificate that the Company desires parties in this docket to execute prior to obtaining access to confidential information.

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 Blvd., Suite 2000
Portland, OR 97232

Public Service Commission of Utah

March 22, 2019

Page 5

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

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is fluid and cursive, with the first name "Michael" being the most prominent part.

Michael S. Snow

Manager, DSM Regulatory Affairs

Enclosures

cc: Division of Public Utilities
Office of Consumer Services

Exhibit A

ROCKY MOUNTAIN POWER

ELECTRIC SERVICE SCHEDULE NO. 114

STATE OF UTAH

**~~Air Conditioner Peak Load~~ Management -Program
(~~Cool Keeper Program~~)**

APPLICABLE: This tariff is applicable to ~~participating-eligible~~ Customers who have premises located in ~~the Control Signal designated a~~ Areas. Customers served by the Company in the state of Utah under Schedules 1, 2, 2E, 3, 6, 6A, 6B, 8, 9, 9A, 23, and 31 located within the ~~Control Signal designated a~~ Areas are eligible to participate in ~~the a Cool Keeper~~ Load Management Program (Program).

PURPOSE: To ~~control summer peak~~ manage electric loads through a Company-dispatched Direct Load Control System (System) ~~owned and installed by the Company or a Company appointed contractor (Contractor)~~.

PROGRAM DESCRIPTION: A detailed description of the ~~P~~ program(s) is found on the Company website at www.rockymountainpower.net/DR ~~www.rockymountainpower.net/coolkeeper~~.

The Company shall have the right to dispatch ~~the s~~ System(s) according to the following criteria:

- a. Dispatch Period: ~~June~~ May 1 through ~~August 31~~ September 30
- b. Available Dispatch Hours: 2:00 PM to ~~9~~ 8:00 PM Mountain Time
- c. Maximum Dispatch Hours: 100 hours per Program Year
- d. Dispatch days: Monday through Friday, excluding holidays
- e. Dispatch Duration: Events will be limited to four hours per day

In the event of a system emergency, Rocky Mountain Power may, at its discretion, expand the dispatch criteria beyond the parameters listed. Emergency events may be used to satisfy requirements of the North American Electric Reliability Corporation (NERC) standard BAL-002-WECC-2 for Contingency Reserve Obligation (CRO) and may be deployed when the utility is experiencing a qualifying event as defined by the Northwest Power Pool.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in ~~Docket Advice~~ No. ~~16-035-T1019-06~~

FILED: ~~November 8, 2016~~ March 22, 2019
~~2016~~ April 22, 2019

EFFECTIVE: ~~December 1,~~

CUSTOMER PARTICIPATION: Participating premises are considered Program participants for the duration of the Program(s). Customers may cancel their participation in the Program(s) at any time. The Company or its Program ~~Provider~~ contractors shall have the right to qualify program participants, at their sole discretion based on criteria the Company or Program ~~provider~~ contractors considers necessary to ensure the effective operation of the ~~P~~ program(s) and utility ~~s~~ System. Program details can be viewed on the Company's website at www.rockymountainpower.net/DRwww.rockymountainpower.net/coolkeeper.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in ~~Docket~~ Advice No. ~~16-035-T1019-06~~

FILED: ~~November 8, 2016~~ March 22, 2019
~~2016~~ April 22, 2019

EFFECTIVE: ~~December 1,~~

ELECTRIC SERVICE SCHEDULE NO. 114 - Continued
INCENTIVES:

Participation Type	Incentive ($\leq 65,000$ Btu/hr (≤ 5.4 tons))	Incentive ($> 65,000$ Btu/hr $\leq 180,000$ Btu/hr (> 5.4 tons and ≤ 15 tons))
Full participation for the dispatch period	\$20	\$40
Customer participants who discontinue before last day of Dispatch Period	\$0	\$0
Customer participants who sign up during the Dispatch Period	Installed in June \$15 Installed in July \$10 Installed in August \$5	Installed in June \$30 Installed in July \$20 Installed in August \$10

Load Management Program	Participating Equipment	Maximum Incentive "up to"
<u>Cool Keeper</u>	<u>Air Conditioners – Level 1</u>	\$40 annually
	<u>Air Conditioners – Level 2</u>	\$80 annually

~~The Program Contractors~~ may provide additional consideration, at no additional cost to the Company or its customers, to encourage enrollment in ~~the a~~ Program. Such consideration may include but is not limited to gift cards or other efforts used to increase Customer interest in ~~the a~~ Program.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

ROCKY MOUNTAIN POWER

ELECTRIC SERVICE SCHEDULE NO. 114

STATE OF UTAH

Load Management Program

APPLICABLE: This tariff is applicable to eligible Customers who have premises located in designated areas. Customers served by the Company in the state of Utah under Schedules 1, 2, 2E, 3, 6, 6A, 6B, 8, 9, 9A, 23, and 31 located within the designated areas are eligible to participate in a Load Management Program (Program).

PURPOSE: To manage electric loads through a Company-dispatched Direct Load Control System (System).

PROGRAM DESCRIPTION: A detailed description of the Program(s) is found on the Company website at www.rockymountainpower.net/DR.

The Company shall have the right to dispatch System(s) according to the following criteria:

- a. Dispatch Period: May 1 through September 30
- b. Available Dispatch Hours: 2:00 PM to 9:00 PM Mountain Time
- c. Maximum Dispatch Hours: 100 hours per Program Year
- d. Dispatch days: Monday through Friday, excluding holidays
- e. Dispatch Duration: Events will be limited to four hours per day

In the event of a system emergency, Rocky Mountain Power may, at its discretion, expand the dispatch criteria beyond the parameters listed. Emergency events may be used to satisfy requirements of the North American Electric Reliability Corporation (NERC) standard BAL-002-WECC-2 for Contingency Reserve Obligation (CRO) and may be deployed when the utility is experiencing a qualifying event as defined by the Northwest Power Pool.

CUSTOMER PARTICIPATION: Participating premises are considered Program participants for the duration of the Program(s). Customers may cancel their participation in the Program(s) at any time. The Company or its Program contractors shall have the right to qualify program participants, at their sole discretion based on criteria the Company or Program contractors consider necessary to ensure the effective operation of the Program(s) and utility System. Program details can be viewed on the Company's website at www.rockymountainpower.net/DR.

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ELECTRIC SERVICE SCHEDULE NO. 114 - Continued
INCENTIVES:

Load Management Program	Participating Equipment	Maximum Incentive “up to”
Cool Keeper	Air Conditioners – Level 1	\$40 annually
	Air Conditioners – Level 2	\$80 annually

Program contractors may provide additional consideration, at no additional cost to the Company or its customers, to encourage enrollment in a Program. Such consideration may include but is not limited to gift cards or other efforts used to increase Customer interest in a Program.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

Confidential
Exhibit B

**THIS EXHIBIT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER
SEPARATE COVER**

Confidential
Exhibit C

**THIS EXHIBIT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER
SEPARATE COVER**

Confidential

Exhibit D

**THIS EXHIBIT IS CONFIDENTIAL IN ITS
ENTIRETY AND IS PROVIDED UNDER
SEPARATE COVER**

CONFIDENTIAL INFORMATION CERTIFICATE

IN DOCKET NO. 19-035-T05

I have reviewed the Public Service Commission of Utah Rule R746-1-603 and/or the Protective Order entered by the Public Service Commission of Utah in Docket No. 19-035-T05 with respect to the review and use of confidential information and agree to comply with the terms and conditions of the rule and/or Protective Order.

Signature

Name (Type or Print)

Employer or Firm

Business Address

Party Represented

Date Signed

CERTIFICATE OF SERVICE

Advice No. 19-06
Docket No. 19-035-T05

I hereby certify that on March 22, 2019, 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

Division of Public Utilities

Erika Tedder etedder@utah.gov

Rocky Mountain Power

Data Request Response Center datarequest@pacificorp.com

Michael Snow michael.snow@pacificorp.com

Jana Saba jana.saba@pacificorp.com
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Katie Savarin
Coordinator, Regulatory Operations