PacifiCorp - Stakeholder Feedback Form

2019 Integrated Resource Plan

PacifiCorp (the Company) requests that stakeholders provide feedback to the Company upon the conclusion of each public input meeting and/or stakeholder conference calls, as scheduled. PacifiCorp values the input of its active and engaged stakeholder group, and stakeholder feedback is critical to the IRP public input process. PacifiCorp requests that stakeholders provide comments using this form, which will allow the Company to more easily review and summarize comments by topic and to readily identify specific recommendations, if any, being provided. Information collected will be used to better inform issues included in the 2019 IRP, including, but not limited to the process, assumptions, and analysis. In order to maintain open communication and provide the broader Stakeholder community with useful information, the Company will generally post all appropriate feedback on the IRP website unless you request otherwise, below.

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						Date of Submittal	C	8/10/2018
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City:	Boulder		State:	СО		Zip:	80304	
Public Meeting Date comments address: 7/23/201		7/23/2018	}		☐ Check here if not rela			cific meeting
List additional organization attendees at cited meeting: Kevin Emerson, Utah Clean Energy								
*IRP Topic(s) and Conservation Pote	d/or Agenda Items: List the ential Study	e specific t	topics th	at are b	peing add	ressed in your co	omments.	
☐ Check he	ere if any of the following in	formation	being su	ıbmitte	d is copy	righted or confid	lential.	
*Respondent Con	nment: Please provide your	feedback	for each	IRP to	pic listed	above.		

Thank you for providing the opportunity to comment on the assumptions and inputs for the Conservation Potential Assessment. In the general the measure lists provided are comprehensive and we don't have any inputs to the types of measures PacifiCorp is considering.

However, upon reviewing the assumptions for each measure we have some concerns about a number of PacifiCorp's general assumptions. We encourage PacifiCorp to consider basing assumptions on recent program implementation experience. This would be consistent with the study measure hierarchy provided by PacifiCorp. In the data provided to stakeholders, the assumptions proposed for the CPA generally lead to higher levelized costs for most measures that those reported in the Rocky Mountain Power 2017 Energy Efficiency and Peak Reduction Report. As measure-level data for 2017 are not available it is impossible to compare incremental savings data between the CPA and actual program performance, but as shown in the attached Excel file, the assumptions for many measures that were key compents of the 2017 RMP energy efficiency programs have higher levelized costs in the CPA than the average levelized cost for the delivered programs and end uses in 2017. We suggest that PacifiCorp consider past program performance when developing assumptions for the CPA and adjust cost and savings assumptions.

In reviewing the assumptions in the CPA we also noticed that the levelized costs for general service lighting varies significantly between the residential sector and non-residential sectors. While some non-residential customers may benefit from better pricing, a descrepency this large for the same measure is concerning. We encourage PacifiCorp to consider adopting the lower increments costs for general service lighting assumed for non-residential measures for the residential program.

PacifiCorp Response:

A meeting was held between PacifiCorp and Southwest Energy Efficiency Project (SWEEP) on August 31, 2018 to discuss the Conservation Potential Assessment (CPA) assumptions. PacifiCorp made adjustments to the CPA as a result of the meeting, and sent SWEEP the updated information on September 20, 2018. These adjustments finalized the CPA and were shared with all stakeholders at the September 27-27, 2018 Integrated Resource Plan public input meeting.

Data Support: If applicable, provide any documents, hyper-links, etc. in support of comments. (i.e. gas forecast is too high - this forecast from EIA is more appropriate). If electronic attachments are provided with your comments, please list those attachment names here.

Please see the attached spreadsheet highlighting the difference in levelized costs between the 2017 Rocky Mountain Power DSM programs and the UCT levelized costs assumed in the CPA for Utah. We can not provide additional specifiity on recommendations without access to measure-level implementation data for the RMP energy efficiency programs. In addition, it was challenging to establish the true incremental costs and incremental savings assumptions for specific measures in the form in which they were provided to stakeholders.

	mendations: Provide any additional recommendations if not included above - specificity is greatly appreciated. are to enter text.
	Check here if you do not want your Stakeholder feedback and accompanying materials posted to the IRP website.
Thank y	you for participating.