

# 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.

Date of Submittal 8/10/2018

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\*Organization: SWEEP

Address: 2334 Broadway, Suite A

City: Boulder

State: CO

Zip: 80304

Public Meeting Date comments address: 7/23/2018

Check here if not related to specific meeting

List additional organization attendees at cited meeting:

Kevin Emerson, Utah Clean Energy

**\*IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.

Conservation Potential Study

Check here if any of the following information being submitted is copyrighted or confidential.

**\*Respondent Comment:** Please provide your feedback for each IRP topic 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 discrepancy 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.

\* Required fields

**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 specificity 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.

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**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated.

[Click here to enter text.](#)

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- Check here if you do **not** want your Stakeholder feedback and accompanying materials posted to the IRP website.

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Thank you for participating.