

PacifiCorp - Stakeholder Feedback Form

2021 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 2021 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 2020-09-18

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Public Meeting Date comments address: 08-28-2020

Check here if not related to specific meeting

List additional organization attendees at cited meeting:

Justin Brant, Southwest Energy Efficiency Project

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

2021 IRP Conservation Potential Assessment in Utah

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

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

***Respondent Comment:** Please provide your feedback for each IRP topic listed above.

By definition, the technical achievable potential should be significantly higher than the amount of DSM that the utility can actually achieve. According to AEG technical achievable potential represents \u001C&potential which can reasonably be acquired through all future potential mechanisms, regardless of how conservation is achieved (including both utility and non-utility interventions) and ignoring cost-effectiveness considerations.\u001D (AEG CPA Vol 1, June 2019, page 11) In early years in the level of Utah DSM identified by AEG (see: 2021 Conservation Potential Assessment Draft Energy Efficiency Measure Results), is virtually the same as or lower than the amount of DSM the Rocky Mountain Power achieved in its annual report in recent years. For example, it is unreasonable for the technical achievable potential in 2021 to be so similar/below to amount of DSM that was achieved in Utah within the last 5 years. This appears to be a clear example of AEG underestimating DSM potential in the CPA. While we recognize that in latter years the amount of technical achievable potential is significant (for example, Utah\u0019s share of the total DSM reaching about 470,000 MWh in 2029 and 2030), the MWh starting point in 2021 is unreasonably low and unrealistic. Even with ambitious ramp rates, the overall amount of DSM is undervalued when the level of DSM is so unreasonably low.

1. Please explain why Utah\u0019s achievable technical potential in 2021 and 2022 is nearly identical or less than the amount of actual DSM achieved in the last 5 years (which ranged from 272,385 MWh in 2019 to 372,945 MWh in 2017), when, by definition, technical achievable potential is meant to represent potential that captures \u001Call future potential mechanisms\u001D and \u001Cignoring cost-effectiveness considerations.\u001D

* Required fields

PacifiCorp Response:

This is reflective of the baseline stock that is available and is mostly related to lighting. The saturation of light emitting diode (LED)'s is increasing significantly in all sectors and therefore the number of baseline bulbs that can be replaced is much smaller than previously.

- 2. Were the customer surveys that RMP conducted to determine the level of LED market adoption representative of all customers (including language, race, and income)? It seems unlikely that Utah would have the highest market penetration of LEDs, given the more ambitious building standards and energy efficiency programs and policies in other PCorp states, esp. Washington.

PacifiCorp Response:

PacifiCorp received 30,028 responses from Utah residential customers for the 2019 Residential Survey. This is a representative sampling of Utah residential customers.

There has been a notable uptick in the saturation of LEDs in Utah between the two most recent surveys.

2017 Survey = 34.1 percent of indoor/outdoor lighting for an average household is LED

2019 Survey = 46.2 percent

- 3. Other states are seeing similar trends. In 2019, OR is 43%, WA is 40.8%.When looking at PCorp's slides from the Aug CPA workshop, it is concerning to see that the Whole Building/Home measure in Utah represents only 4.9% of the total but 15.9% in Oregon, when Utah is PCorp's highest growth state. Please explain the assumptions and methods that resulted in this low percentage in Utah.

PacifiCorp Response:

This is a difference between how Oregon and Utah model due to how the programs operate in Oregon. Oregon models all residential new construction opportunities as a whole home measure, whereas all the other states have options for both whole home measures and individual measure installations. If all measures in the 'new' vintage were summed together, the savings percentage is around 30 percent of total savings for new construction in Utah.

- 4. For Utah, the Building Shell measure is set at a 'Retro Slow' ramp rate at a time when RMP is pushing electrification and we're starting to see more demand for heat pumps. With a push for electrification the building shell measure should be at a higher ramp rate because a well-built building shell can help reduce the size and operation of heat pumps, therefore reducing overall electricity consumption.

PacifiCorp Response:

The ramp rates are calibrated to where programs are at today with savings and ramp up over time. As electrification ramps in Utah, the building shell measure is also ramping up and capturing more savings.

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.

https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/environment/dsm/2019-final-study/PacifiCorp_DSM_Potential_Vol_1_Executive_Summary_Final_2019-6-30.pdf

https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2021-irp/2021-irp-support-and-studies/PacifiCorp_2021_Non-Res_Measure_List_Draft_FINAL.xlsx

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

It would be very helpful if you would adjust the format for this online feedback form to make submitting data easier on the respondent's end. For example, the Respondent Comment field, it would be helpful if the text input bar was resizable so it shows multiple lines/paragraphs.

* Required fields

Please submit your completed Stakeholder Feedback Form via email to IRP@PacifiCorp.com

Thank you for participating.

* Required fields