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IDAHO PUBLIC  
UTILITIES COMMISSION

1407 W. North Temple, Suite 330  
Salt Lake City, Utah 84116

January 6, 2022

***VIA ELECTRONIC FILING***

Idaho Public Utilities Commission  
11331 W. Chinden Blvd.  
Building 8 Suite 201A  
Boise, ID 83714

Attn: Jan Noriyuki  
Commission Secretary

**RE: Case No. PAC-E-21-16**

In the Matter of the Application of Rocky Mountain Power For Authority to Implement a  
Battery Demand Response Program  
**Reply Comments**

Please find enclosed Rocky Mountain Power's Reply Comments in the above referenced matter.

Informal questions related to this matter may be directed to Ted Weston at (801) 220-2963 or me  
at (801) 220-4214.

Sincerely,

Michael S. Snow  
Manager, Regulatory Affairs

Enclosures

Emily Wegener (ISB# 11614)  
Rocky Mountain Power  
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Salt Lake City, Utah 84116  
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*Attorney for Rocky Mountain Power*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE APPLICATION )</b>	
<b>OF ROCKY MOUNTAIN POWER FOR )</b>	<b>CASE NO. PAC-E-21-16</b>
<b>AUTHORITY TO IMPLEMENT A )</b>	
<b>BATTERY DEMAND RESPONSE )</b>	<b>REPLY COMMENTS</b>
<b>PROGRAM )</b>	

COMES NOW, Rocky Mountain Power, a division of PacifiCorp (the “Company”), in accordance with RP 052 and RP 201, *et. seq.*, hereby respectfully submits reply comments to the Idaho Public Utilities Commission (the “Commission”) in the above-referenced matter.

**BACKGROUND**

1. On October 15, 2021, the Commission issued a Notice of Modified Procedure in Order No. 35197 for the above referenced matter, allowing parties to file comments by December 16, 2021, with the Company’s reply comments due by January 6, 2022. Commission Staff (“Staff”) filed comments December 16, 2021. Staff supports the Company’s Application to implement a Battery Demand Response Program (“Program”) with recommended adjustments, including running the Program initially as a Pilot, including updated definitions within Schedule 114, and adding annual reporting requirements. The Company provides these reply comments in response to comments filed by Staff.

**REPLY COMMENTS**

2. The Company is agreeable to Staff’s recommendation to implement the Program as a pilot for five years. However, it should be noted that the proposed Program is an

expansion of the already established Wattsmart Batteries program offered in Utah, as referenced in the Company's response to Staff's Set 2 Data Request No. 25. Attached hereto as Exhibit A is an updated Schedule 114 tariff sheet to reflect the pilot status of the program. Attached hereto as Exhibit B are updated flexible tariff materials to include a definition for continuous output and remove the custom incentive option, per Staff's recommendations. The Company will also ensure the Program website includes information on the incentive structure and other Program details to help customers be informed and educated on Program offerings and requirements. Additionally, while the Company acknowledges Staff's concerns and recommendation for cost effectiveness assumptions that are more specific towards Idaho, the established Wattsmart Batteries program is designed and operated as a PacifiCorp system resource. The Company's intent is to expand the Wattsmart Battery program to multiple PacifiCorp states and to be managed, reported on, and valued with continuity. The Company acknowledges the cost effectiveness and system benefits will evolve over time and we will share results in reporting and discuss with Staff during subsequent routine meetings held for demand side management updates. The Company believes the Wattsmart Battery program can be operated cost effectively.

3. With respect to incentives and the Program structure, the Company will make adjustments on an annual basis per Staff's recommendation. However, mid-year adjustments may also be made if necessary in response to market conditions (e.g. changes in materials costs, product availability, price competition, etc.) and to stay in alignment with the Program's targets and budget. The Company will work with Staff if mid-year adjustments are needed beyond the planned annual timeframe.

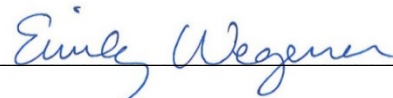
4. With respect to annual reporting, the Company will include a report of Program details as part of the Company's existing Demand Side Management report, currently due by May 1<sup>st</sup> annually. Some of the key deliverables and metrics mentioned in Attachment A to Staff's comments may not be practicable to track and report on due to the limitations of the Company's systems. The Company will discuss further with Staff and make best efforts to include the requested metrics in annual reporting.

#### **REQUEST FOR RELIEF**

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission approve the Company's Application to implement a battery demand response program as discussed herein and supported by Staff.

DATED this 6<sup>th</sup> day of January, 2022.

Respectfully submitted,

By 

Emily Wegener  
Attorney for Rocky Mountain Power

# **Exhibit A**

**ROCKY MOUNTAIN POWER**  
**ELECTRIC SERVICE SCHEDULE NO. 114**  
**STATE OF IDAHO**

**Load Management Pilot 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 Idaho taking service under the Company's electric service schedules listed on Schedule 191 – Customer Efficiency Services Rate Adjustment 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.

**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.

**PROVISIONS OF SERVICE:**

1. Qualifying Equipment or Services, incentive amounts, and participation procedures will be listed on the program website.
2. Incentive delivery may vary by technology and may include cash payments and/or bill credits.
3. Incentives may be offered year-round or for selected time periods.
4. Incentive offer availability, incentive levels, and Qualifying Equipment or Services may be changed to reflect changing codes and standards, sales volumes, quality assurance data, or to enhance program cost effectiveness.
5. All changes will occur with a minimum of 45 days notice and be prominently displayed as a change on the Company's website.

**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.

## **Exhibit B**

## Idaho Load Management Pilot Program

### This document includes the following sections:

- Definitions of terms used in Schedule 114 and other program documents
- Incentives – General Information
- Dispatch Parameters
- Incentive Tables

### DEFINITIONS

**Annual Participation Incentive:** Incentives participating customers may receive for ongoing active participation in a Load Management program.

**Available Dispatch Hours:** Daily timeframe within which the Company may dispatch its load control system(s).

**Continuous Output:** Inverter is capable of discharging at this rate of power (kW) without interruption or reduction, continuously, when connected to the utility grid and under normal conditions, as long as the battery's state of charge allows.

**Customer:** Any party who has applied for, been accepted, and receives service at the real property, or is the electricity user at the real property.

**Dispatch Days:** The days upon which the Company may or may not dispatch its load control system.

**Dispatch Duration:** The duration of time that load control events may be dispatched for.

**Dispatch Parameters:** The criteria within which the Company may dispatch its load control system(s).

**Dispatch Period:** The calendar year timeframe within which the Company may dispatch its load control system(s).

**Enrollment Incentive:** Upfront incentives participating customers may receive upon their enrollment in a Load Management program.

**Incentive:** Payments of money or bill credits made by Company to Owner or Customer for participation in a Load Management offer.

**Incentive Application:** An application submitted by Owner or Customer to Company for Incentives.



**Incentive Offer Letter:** An offer made by Company and acknowledged by Owner or Customer providing for Company to furnish Incentives for a Load Management Project.

**Maximum Dispatch Hours:** The maximum amount of time the Company may dispatch its load control system annually.

**Owner:** The person who has both legal and beneficial title to the real property, and is the mortgager under a duly recorded mortgage of real property, the trustor under a duly recorded deed of trust.

## **INCENTIVES – GENERAL INFORMATION**

### **Incentives for Measures Listed in the Incentive Tables**

Dollar values listed in the incentive tables are the maximum amounts approved for programs. Incentive amounts that customers may actually receive are managed and available on the Company’s website, which may be less than the approved maximum amounts. Incentives are subject to change through notices posted on the Company’s website.

### **Custom Incentives**

Where custom is listed in the incentive tables, custom incentives may be considered for customers with custom projects.

### **Program Contractors**

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

## **DISPATCH PARAMETERS**

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

<b>Wattsmart Batteries</b>	
<b>Dispatch Period</b>	January 1 through December 31
<b>Available Dispatch Hours</b>	12:00am to 11:59pm Mountain Time
<b>Maximum Dispatch Hours</b>	N/A
<b>Dispatch Days</b>	Monday through Sunday
<b>Dispatch Duration</b>	Events may be held multiple times per day up to two full battery duty cycles

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.

## INCENTIVE TABLES

**Table 1 – Wattsmart Batteries**

Load Management Program	Participating Equipment	Maximum Incentive “up to”		
		Enrollment Incentive <sup>1</sup>	Annual Participation Incentive During Commitment Term <sup>2</sup>	Annual Participation Incentive <sup>3</sup>
Wattsmart Batteries	Residential Batteries	\$150/kW x Annual Commitment Term	\$15/kW	\$50/kW
	Commercial Batteries	\$150/kW x Annual Commitment Term	\$15/kW	\$50/kW
	<del>Custom</del>	<del>Custom</del>		

1. Enrollment Incentives are capped at 70% of battery equipment costs and available to new battery purchases only.
2. Participation Incentives are eligible to be applied towards monthly energy charges. Customers will still be responsible for fixed customer charges
3. Applicable to new batteries after the commitment term or existing batteries where the enrollment incentive and commitment term is not applicable. Participation Incentives are eligible to be applied towards monthly energy charges. Customers will still be responsible for fixed customer charges.

## CERTIFICATE OF SERVICE

I hereby certify that on this day, I caused to be served, via email, a true and correct copy of Reply Comments in Docket PAC-E-21-16 to the following:

### Service List

<b>PacifiCorp</b>	
Ted Weston Michael Snow PacifiCorp/ dba Rocky Mountain Power 1407 West North Temple Suite 330 Salt Lake City, UT 84116 E-Mail: <a href="mailto:ted.weston@pacificorp.com">ted.weston@pacificorp.com</a> <a href="mailto:michael.snow@pacificorp.com">michael.snow@pacificorp.com</a>	Emily Wegener PacifiCorp/ dba Rocky Mountain Power 1407 West North Temple Suite 320 Salt Lake City, UT 84116 E-Mail: <a href="mailto:emily.wegener@pacificorp.com">emily.wegener@pacificorp.com</a>
<b>Idaho Irrigation Pumpers Association</b>	
Eric L. Olsen Echo Hawk & Olsen PLLC 505 Pershing Ave., Suite 100 PO Box 6119 Pocatello, ID 83205 E-Mail: <a href="mailto:elo@echohawk.com">elo@echohawk.com</a>	
<b>Commission Staff</b>	
Erick Shaner Deputy Attorney General Idaho Public Utilities Commission 11331 W. Chinden Blvd., Bldg No. 8, Suite 201-A (83714) PO Box 83720 Boise, ID 83720-0074 E-mail: <a href="mailto:erick.shaner@puc.idaho.gov">erick.shaner@puc.idaho.gov</a>	

Dated this 6<sup>th</sup> day of January, 2022.



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Mary Penfield  
Adviser, Regulation