## **DECISION MEMORANDUM**

TO: COMMISSIONER ANDERSON

COMMISSIONER HAMMOND COMMISSIONER LODGE COMMISSION SECRETARY

**COMMISSION STAFF** 

**LEGAL** 

FROM: ADAM TRIPLETT

**DEPUTY ATTORNEY GENERAL** 

DATE: FEBRUARY 6, 2024

SUBJECT: IN THE MATTER OF ROCKY MOUNTAIN POWER'S APPLICATION

FOR APPROVAL OF ADJUSTMENTS TO THE IRRIGATION LOAD

CONTROL PROGRAM; CASE NO. PAC-E-24-02.

On January 24, 2024, Rocky Mountain Power, a division of PacifiCorp ("Company"), applied for approval of certain adjustments to its Irrigation Load Control Program ("ILC"). Participants in the ILC earn cash incentives for reducing their electric consumption during peak demand periods. The Company indicates that its contract with Enel X (the third-party administrator of the ILC) is ending, necessitating the formation of a new, updated contract. The proposed new, updated contract defines not only the specific services Enel X will perform in connection with the ILC, but also the pricing for the ILC.

The Company represents that the ILC has changed little over the last decade and anticipates few changes going forward. However, the Company's new, updated contract with Enel X increases the monetary incentives for ILC participants by 30%, with subsequent annual increases of 2.5%. The Company believes these increases are necessary to avert, and possibly reverse, the declining participation in the ILC experienced during the last decade. Accordingly, the Company requests that the Commission approve continuation of the ILC via a new 10-year contract with Enel X, effective April 1, 2024. The Company requests this matter be processed via modified procedure.

## STAFF RECOMMENDATION

Staff recommends that the Commission issue a Notice of Application and Notice of Intervention Deadline establishing a 21-day intervention period and suspend the Company's requested effective date until May 31, 2024, unless a final order is issued before.

## **COMMISSION DECISION**

Does the Commission wish to issue a Notice of Application and Notice of Intervention Deadline establishing a 21-day intervention period and suspend the Company's requested effective date until May 31, 2024?

Adam Triplett

Deputy Attorney General