

## **DECISION MEMORANDUM**

**TO: COMMISSIONER ANDERSON  
COMMISSIONER HAMMOND  
COMMISSIONER LODGE  
COMMISSION SECRETARY  
COMMISSION STAFF  
LEGAL**

**FROM: ADAM TRIPLETT  
DEPUTY ATTORNEY GENERAL**

**DATE: MARCH 19, 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 indicated 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 represented 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% built in. These increases are intended to avert, and possibly reverse, declines in ILC participation experienced during the last decade. The updated contract also permits the Company to initiate called events upon two-hour’s notice, rather than the previously required four hours. The Company requested that the Commission approve continuation of the ILC via a new ten-year contract with Enel X, effective April 1, 2024.

At the Commission’s February 6, 2024, Decision Meeting, Staff presented a Decision Memorandum recommending the Commission suspend the proposed effective date to allow additional time to review the Company’s proposal and public comment.

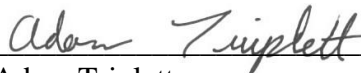
On February 21, 2024, the Commission issued a Notice of Application, Notice of Intervention Deadline, and Notice of Suspension of Proposed Effective Date, setting an intervention deadline of March 13, 2024, and suspending the Company's proposed effective date to May 31, 2024. Only the Idaho Irrigation Pumpers Association, Inc. intervened.

### **STAFF RECOMMENDATION**

Staff recommends the Commission issue a Notice of Modified Procedure, establishing a public comment deadline of April 18, 2024, and company reply deadline of May 2, 2024.

### **COMMISSION DECISION**

Does the Commission wish to issue a Notice of Modified Procedure establishing a public comment deadline of April 18, 2024, and company reply deadline of May 2, 2024?

  
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Adam Triplett  
Deputy Attorney General

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