

December 20, 2024

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

**Re: Advice No. 24-022—PacifiCorp's Wattsmart Battery Demand Response Program
Using the Provisions of Schedule 106**

In compliance with ORS 757.205, OAR 860-022-0025, and OAR 860-022-0030, PacifiCorp, d/b/a Pacific Power (PacifiCorp or the Company), submits for the Public Utility Commission of Oregon's (Commission) approval the following proposed Wattsmart Battery Demand Response Program (Wattsmart Battery Program, or Program) using the provisions of Schedule 106.¹ The Company requests an effective date of February 19, 2025.

Background

PacifiCorp has operated the Wattsmart Battery Program in other states since 2020.² The Program aggregates individual customer batteries into a coordinated system for providing grid services. It provides incentives for utility customers who integrate their battery into a distributed battery grid management system (DBGMS), which PacifiCorp can call upon via software to provide grid services at scale. This distributed system of dispatchable batteries is also known as a virtual power plant (VPP). While typical demand response programs operate with predetermined dispatch calls, the Wattsmart Battery Program goes a step further, using the DBGMS to actively manage power dispatch in real time.

Company modeling has identified a need for demand response not just in the short term but throughout the 20-year planning horizon. The 2023 Integrated Resource Plan (IRP) Update integrated portfolio included the addition of 25 megawatts (MW) of cost-effective demand response in Oregon in 2025 with additional MWs being brought on in subsequent years.³ Since the selected resources cover multiple customer types and programs, the Company requested and received approval for a broad demand response tariff, Schedule 106 to support multiple programs. PacifiCorp has already utilized Schedule 106 to expand the offer for irrigation customers, add an offer for residential customers as well as for commercial and industrial

¹ Schedule 106, approved in Advice No. 22-004, outlines the basic program elements including customer eligibility, the possibility of a program administrator for program delivery, incentive levels that may change, and the change process. Specific details such as eligibility requirements, dispatch notifications, change process, and incentive levels for each program will be included on the program website section of the Company website. PacifiCorp will not use the change process outlined in Schedule 106 to make changes to Schedule 106, remove or add pilots/programs to Schedule 106, or propose an increase of expenditures greater than 130 percent of total estimated annual budgets for programs under Schedule 106.

² [Wattsmart Battery program](#)

³ Capacity impacts represent the average of winter and summer impacts in the 2023 IRP Update as seasonal MW volumes in the program are not additive.

customers.⁴ This is the fourth demand response program to utilize the provisions of Schedule 106.

Wattsmart Battery Program Proposal

The Wattsmart Battery Program will promote and incentivize the installation of individual batteries for system-wide integration which will facilitate grid management. The Company's 2023 IRP includes nearly 600 MW of demand response capacity, including battery storage, across the system by 2028. Establishing the Wattsmart Battery Program will ensure that battery equipment installed by customers behind the meter is integrated safely into the Company's systems and will provide benefits for both the customer and the grid. Leveraging the batteries from the Wattsmart Battery Program will create opportunity in the following areas:

- **Utility Grid Management** – The Wattsmart Battery Program will enable the Company to utilize qualified batteries for utility grid management 24 hours per day/365 days per year, providing year-round value to effectively manage the electric grid. The batteries may be utilized for traditional demand response, frequency reserve, contingency reserve, regulation reserves, regional grid management, backup power and other ancillary benefits in addition to reducing peak load on the electric system. Initial parameters used to dispatch the batteries for grid management are identified in the Dispatch Period section below. As the Program matures, dispatch parameters may change for continual improvement. Initially, batteries will be used to off-set customers' load, but as the Program evolves and matures, the Company intends to add other capabilities, such as allowing customers to charge batteries during the day with excess solar and export the solar energy during peak times, to maximize benefits for all parties.
- **Load Shaping** – The Company will help customers optimize batteries in coordination with daily peak and off-peak periods. For example, a customer with solar will charge the battery with any excess generation during the middle of the day, and in turn will utilize the battery to offset energy use during peak periods. Partnering with customers with batteries to manage excess solar during the day and peak periods in the evenings will provide the greatest benefits for customers and the utility grid.
- **Utility Integration of Behind-the-Meter Batteries** – The battery storage industry is still in its infancy, and there is a lack of standards for utility grid integration from both a safety and operational perspective. This program will help provide battery manufacturers guidance on how to qualify to participate in a utility grid-optimized battery solution.

Customer Participation and Eligibility

The Wattsmart Battery Program will be available to all retail tariff customers taking service under the Company's electric service schedules listed on Schedule 291 – System Benefits Charge. Both residential and commercial customers may participate; however, the Company anticipates that initially, participation will come from residential customers with solar.

⁴ Advice No. 22-004 approved on May 5, 2022, expanded the offer for irrigation customers. Advice No. 22-011 approved on November 16, 2022, added an offer for commercial and industrial customers. Advice No. 24-014, approved on September 19, 2024, added an offer for a Community-Based Renewable Energy Resilience Hub pilot.

Customers may participate by installing eligible battery equipment and allowing the Company to utilize the battery for grid management. Customers will be compensated for enrolling through an enrollment incentive and an annual bill credit. Customers will be required to commit to the Program for a minimum of four years to receive an enrollment incentive. After the commitment term, customers will have the opportunity to receive an annual incentive for their continued participation beyond the initial commitment term. The commitment term may change depending on Program needs.

Participating customers will also be required to provide information including their name, business (if applicable), installation address, and contact information to assist with eligibility and installation verification activities prior to enrolling. If a participating customer chooses to end their participation during their initial commitment period, the Company will require the participating customer to return their enrollment incentive on a pro-rated basis.

Batteries must meet program participation requirements to qualify for an incentive, including the integration into the Company's DBGMS. Battery manufacturers who have a product capable of meeting the requirements for utility-controlled demand response and who are willing to work with the Company and its partners to integrate into the DBGMS can qualify their batteries for participation in the Wattsmart Battery Program.

Incentive Structure

Wattsmart Battery incentives will be available to customers with installed batteries capable of communicating with the Company's DBGMS. An up-front enrollment payment incentive will be offered to customers who commit to the minimum term with a newly purchased battery.⁵ The minimum term will initially be set at four years but may change as the Program evolves. Program participants will also receive an annual bill credit incentive for their continued participation.

Customers with pre-existing eligible batteries may also participate in the Program but will not be required to commit to a minimum term. Instead, due to free ridership concerns, customers with existing eligible batteries may start off at the increased annual bill credit incentive for as long as they remain enrolled.

Customers will receive their enrollment incentive as a direct payment once eligibility and installation have been verified. Annual participation incentives will be given as monthly bill credits. The incentive for all participating customers will be \$150/kilowatt (kW) multiplied by the commitment term. Table 1 provides the incentive levels for Program enrollment and annual participation incentives.

⁵ The Company defines "newly purchased" as purchased after the effective start date of the Program.

Table 1 – Wattsmart Battery Incentives

Load Management Program	Participating Equipment	Maximum Incentive (“up to”)		
		Enrollment Incentive ⁶	Annual Participation Incentive During Commitment Term ⁷	Annual Participation Incentive ⁸
Wattsmart Battery	Residential Batteries	\$150/kW x Annual Commitment Term	\$15/kW	\$50/kW
	Commercial Batteries	\$150/kw x Annual Commitment Term	\$15/kW	\$50/kW
	Custom	Custom		

Enrollment incentives will be based on the kW capacity of the enrolled battery, multiplied by the commitment term. For example, if a residential customer enrolls a 5kW battery with a commitment term of four years, their enrollment incentive will be \$3,000 (5kW x \$150 x 4 years). During the commitment period for years two to four, the program participation annual incentive would be \$75 (5kW x \$15). If the same customer continues to participate beyond the four-year commitment term, their annual participation incentive could be up to \$250 (5kW x \$50). If a customer opts out of participating after their commitment term, their annual participation incentive will be pro-rated.

At the Company’s discretion, custom incentives and commitment terms may be considered for customers with custom battery projects or large capacity batteries. The Company will evaluate incentive levels and program requirements periodically and may adjust them through the appropriate process based upon various factors, such as battery market changes, federal and state incentive levels, participation numbers and cost-effectiveness.

As an alternative solution for customers who want batteries, but do not have the funds to cover the associated equipment and installation costs, the Company may provide a lease type agreement option, where the Company will work with qualified trade-allies to install and maintain the batteries.

Projected Program Costs and Participation Rates

The Wattsmart Battery Program is forecast to achieve approximately 26 MW of battery demand response by 2030. The majority of expenditures in the initial years of the program are anticipated to be customer enrollment incentives. Table 2 provides a breakdown of estimated program costs by category for 2025 through 2027. Table 3 provides a 6-year outlook of projected participation.

⁶ Enrollment incentives will be capped at 70 percent of battery equipment costs and available for new battery purchases only.

⁷ Participation incentives are eligible to be applied toward monthly energy charges. Customers will remain responsible for fixed charges.

⁸ 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 remain responsible for fixed charges.

Table 2 – Estimated Program Costs by Category

Cost Category	2025	2026	2027
Start-up Costs	\$100,000		
Program Administration	\$20,000	\$25,000	\$30,000
Software Costs	\$30,000	\$60,000	\$100,000
Marketing	\$5,000	\$5,000	\$5,000
Total Incentives	\$900,000	\$1,522,500	\$1,460,000
Total Program Costs	\$955,000	\$1,612,500	\$1,595,000

Table 3 – Estimated 6-Year Program Participation⁹

Year	Estimated Incremental Battery Participation	Estimated kW - Cumulative
2025	300	1500
2026	500	4000
2027	700	7500
2028	1000	12,500
2029	1250	18,750
2030	1500	26,250

Quality Assurance, Eligible Equipment and Dispatch Period

For the Company to communicate with installed battery equipment, participating customers must have a reliable internet connection and Wi-Fi network and any other related equipment or system elements on the premises that may be required by the Company or equipment manufacturer. Battery manufacturers will be eligible to participate in the Program as long as they are willing to allow their batteries to be integrated into the Company’s DBGMS and meet equipment eligibility. To justify the incentives being provided and to maintain cost effectiveness, the batteries must be able to provide daily load cycling, frequency response, and parameters identified below. If participating batteries are unable to regularly meet the requirements listed below, PacifiCorp will seek a prorated return of the Wattsmart Battery Program enrollment incentive.¹⁰

At the outset of the Wattsmart Battery Program, eligible equipment may consist of the following:

- Ability to integrate in the DBGMS
- Utility grade batteries with a minimum of 4 kW / 10 kilowatt-hour
- Minimum of 10-year battery life (warranty)
- Minimum of 7,500 battery cycle life to accommodate for daily load cycling
- Ability to charge/discharge multiple times a day
- Full dispatch control by PacifiCorp to meet the needs of the program

⁹ Participation rates forecast in this table assume that customers take advantage of all available incentives and tax credits.

¹⁰ The Company proposes the definition of “regular” participation in the program to be a minimum of two consecutive weeks of dispatch.

- Proper UL or equivalent safety certifications for residential and commercial applications

As technology evolves and new products become available, it is anticipated more batteries will become eligible. The Company will maintain an updated list of eligible batteries and other requirements for participation on the Wattsmart Battery Program website.

The Company shall have the right to dispatch the Wattsmart Battery system based on the following criteria:

- Daily load cycling for peak management
- Utilized for traditional demand response, frequency reserve, contingency reserve, regulation reserves, regional grid management, backup power and other ancillary needs.
- Dispatch Days: Monday through Sunday, including holidays, year-round.
- Dispatch Duration: Dispatches may be held multiple times per day up to two full duty cycles of the battery

At the outset of the Wattsmart Battery Program, batteries will be dispatched to off-set customers' load, as discussed in the Load Shaping paragraph above. As the Program evolves and matures, the Company intends to add capability to the timing of dispatch, such as charging batteries during the day with excess solar and exporting the solar energy during peak times, to maximize benefits for all parties.

The Company may dispatch batteries to the system as necessary without advanced notice. The Company will not drain batteries below 10 percent capacity to ensure customers retain a minimum level for emergency backup. The DBGMS and integration into the Company's Energy Management System makes this possible to manage. Additionally, Wattsmart Battery dispatch events will be managed to minimize use of the battery system during or prior to an event that is expected to cause system outages.

In the event of a local outage, the battery will be used as backup power for the customer. While there are many factors that influence customer load, including battery size, house size, solar array, time of year, etc., it is estimated that 10 percent capacity will provide 1-8 hours of emergency backup power for an average customer. The Company will continually evaluate this percentage and update, if necessary, to ensure the batteries are available when needed for customers.

PacifiCorp is in close collaboration with the Energy Trust of Oregon, meeting regularly to identify and plan for opportunities to maximize the benefits of each respective battery storage offering for its customers. When approved, the Company will formalize a plan to articulate a seamless and successful experience for participating customers and the industry installers that serve them.

Cost Recovery

PacifiCorp proposes to include utilize the existing deferral docket for Schedule 106 programs, docket UM 2265, to track the costs associates with the Wattsmart Battery Program, and recover the approved Wattsmart Battery Program costs through its Schedule 291. The Company is not proposing a change to Schedule 291 as part of this filing.

Annual Reporting

PacifiCorp will provide an annual report for the Wattsmart Battery Program by March 31 of the following year with information such as participating customers, aggregate impacts by equipment type, opt outs, incentive and non-incentive expenditures, enrollment changes, customer service/satisfaction, and cost effectiveness. The first comprehensive report will be filed in 2026, after a full year of program operation.

Cost Effectiveness

The cost effectiveness analysis workbook and summary memo for the Wattsmart Battery Program are based on the maximum “up to” incentive levels. As avoided costs are considered proprietary on load control programs, the cost effectiveness results are provided below with a “pass” and “fail” designations, which equate to a benefit to cost ratio of 1.0 or better. Due to the nature of demand response, and consistent with the cost effectiveness methodology for other demand response programs, the Participant Cost Test is not applicable. The Wattsmart Battery Program is expected to be cost effective under the UCT, which should be utilized as the key determination of cost effectiveness for a program of this type.

Table 4 – Wattsmart Battery Program Level Cost Effectiveness Results

Benefit/Cost Test	Benefit/Cost Ratio
PacifiCorp Total Resource Cost Test (PTRC) + Conservation Adder	Pass
Total Resource Cost Test (TRC) No Adder	Pass
Utility Cost Test (UTC)	Pass
Rate Impact Test (RIM)	Pass
Participant Cost Test (PCT)	N/A

Stakeholder Involvement

Stakeholder engagement has been a valued component of the development of the Wattsmart Battery Program. Table 5 below lists the engagement events PacifiCorp participated in where the Wattsmart Battery Program or general battery programs were discussed or presented to stakeholders.¹¹ A summary of each event is provided in Exhibit A.

¹¹ Discussions about the Wattsmart Battery Program have occurred within several meetings with the Energy Trust of Oregon (ETO) and will continue to occur throughout the life of the Program.

Date	Event
January 21, 2020	CPA workshop meeting
February 18, 2020	IRP technical workshop
April 14, 2020	Demand Response stakeholder interest meeting
April 16, 2020	IRP public input meeting
June, 2020	Meeting with Energy Trust of Oregon
June 18 & 19, 2020	IRP public input meeting
August 28, 2020	IRP public input meeting
October 22, 2020	IRP public input meeting
August 16, 2021	Written update on demand response filed
August 27, 2021	IRP public input meeting
December 6, 2021	Demand Response workshop
January 7, 2022	Meeting with Energy Trust of Oregon
November 17, 2022	CBIAG meeting
December 1, 2022	CPA IRP discussion
January 10, 2023	Demand Response technical workshop
February 21, 2023	Meeting with Energy Trust of Oregon
September 10, 2024	Clean Energy Plan Stakeholder Engagement Group meeting
September 27, 2024	Tribal Nations Clean Energy Plan Engagement Group meeting
September 30, 2024	Solar Industry Stakeholder Meeting
October 11, 2024	Developer Stakeholder Meeting
October 16, 2024	Solar Industry Stakeholder Meeting
October 16, 2024	Draft filing shared with stakeholders
October 25, 2024	Comments from City of Portland
October 30, 2024	Comments from Joint Organizations
October 31, 2024	ETO Work Session
October 31, 2024	Comments from ETO
November 1, 2024	Meeting with ETO
November 4, 2024	Comments from OPUC Staff
November 7, 2024	Meeting with OPUC Staff
November 12, 2024	Meeting with PGE
November 15, 2024	Meeting with OPUC Staff
November 18, 2024	Meeting with ETO
November 18, 2024	Comments from OPUC Staff
November 19, 2024	Meeting with OPUC Staff
November 21, 2024	ETO Work Session
November 21, 2024	Meeting with OPUC Staff
November 26, 2024	Meeting with ETO
December 10, 2024	Meeting with ETO
December 16, 2024	Meeting with OPUC Staff

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In support of this filing, PacifiCorp submits the following exhibits:

- Exhibit A: Wattsmart Proposal Stakeholder Engagement
- Exhibit B: Wattsmart Battery Program Website Content

It is respectfully requested that all formal data requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Please direct any informal questions about this filing to Ryan Harvey, Senior Product Manager, at (503) 704-9717 or Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely

A handwritten signature in black ink, appearing to read 'Matthew McVee', with a stylized, flowing script.

Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

Exhibit A

Wattsmart Proposal Stakeholder Engagement

Exhibit A

Wattsmart Battery Program Stakeholder Engagement

On January 21, 2020, PacifiCorp held a CPA workshop meeting in the 2021 IRP public input process. Highlights included review prior IRP/CPA comments, proposed CPA methodologies for demand response, interactions between demand response and pricing/rates options.

On February 18, 2020, PacifiCorp held a technical workshop in the 2021 IRP public input process. Highlights included further defining the grid services a demand response resource can provide and IRP credits for demand response.

On April 14, 2020, PacifiCorp held a stakeholder meeting interested in demand response. Highlights included background information on existing demand response programs, review of demand response in 2019 IRP, review of demand response potential in the conservation potential assessment, discussion of pilot concepts, and gathering input on how to structure or focus a demand response RFP.

On April 16, 2020, at its regular IRP public input meeting, PacifiCorp shared information on the demand response stakeholder meeting with the broader IRP audience.

In June 2020, the Company and Energy Trust of Oregon met to have an intentional conversation around how to run energy efficiency/demand response programs most effectively for Oregon customers. The discussion was intended to gain insight into Energy Trust interactions with Portland General Electric Company's demand response programs.

On June 18 & 19, 2020, PacifiCorp held an IRP public input meeting, which included 2019 IRP Action Item 4 acknowledgement with demand response conditions.

On August 28, 2020, PacifiCorp held an IRP CPA Technical Workshop. Highlights included an assessment of demand response resources, assessment methodology, transition to grid services view of demand response, development of demand response costs, draft potential results (short and long duration, winter, and summer) and a demand response RFP update.

On October 22, 2020, PacifiCorp held an IRP public input meeting. Highlights included demand response ramp rates, battery storage assumptions, types of demand response costs used in the leveled calculation, demand response cost bundles.

On August 16, 2021, PacifiCorp filed a written update on its demand response efforts in Oregon in compliance with the directive provided by the Commission in Order No. 20-186. Staff provided a summary of the update at the August 24, 2021, regular public meeting.

On August 27, 2021, PacifiCorp held an IRP public input meeting highlighting the 2021 preferred portfolio action plan with demand side management actions.

On December 6, 2021, the Company held a demand response workshop with invitations sent to 17 organizations. Topics included Potential programs and design elements, targeted customers and eligibility, event parameters, measurement and verification structures, recruitment and managing the customer relationship, cost-effectiveness, evaluation, reporting, cost recovery, process and next steps.

On January 7, 2022, Company representatives met with Energy Trust staff to share the Company's plan for demand response in Oregon and explore opportunities for future coordination. Furthermore, during the last two years, integrating demand response with energy efficiency programs in general, and specifically joint opportunities for residential customers has been a standing topic during the regular coordination meetings between the Energy Trust and the Company.

On November 17, 2022, the Company provided information on residential demand response to the Oregon Community Benefits and Impacts Advisory Group (CBIAG).

On December 1, 2022, the company provided information on demand response resources, including residential during our 2023 CPA IRP discussion.

On January 10, 2023, the Company hosted a technical workshop to educate and inform on the proposed residential demand response program and Seek feedback on the proposed design. The workshop was attended by 23 participants representing 13 organizations. Presentation materials and meeting notes were posted on January 24, 2023.

On February 21, 2023, representatives from the Company and the Energy Trust met to discuss collaboration on demand response and energy efficiency offers for residential customers in Oregon including the possibility of bundling offers and co-marketing.

The Wattsmart Battery Program was first introduced to Oregon stakeholders at the Clean Energy Plan Stakeholder Engagement Group meeting on September 10, 2024. A summary of the Program design and incentives were provided to those in attendance.

Program design and incentive levels were also presented at the Tribal Nations Clean Energy Plan Engagement Series meeting on September 27, 2024.

On September 30, 2024, PacifiCorp met with an Oregon-based solar installer. This meeting was a result of an email sent earlier in the month and was organized to increase awareness within the industry of the proposed program.

On October 11, 2024, PacifiCorp organized a meeting with a prominent project developer. This meeting was a result of an email sent earlier in the month and was organized to increase awareness within the industry of the proposed program.

On October 16, 2024, the Company met for the second time with an Oregon-based solar installer. The meeting was scheduled to answer additional questions about the proposed program.

Feedback on the draft filing was requested by the Company in the form of an email sent on October 16, 2024, to the email lists associated with the Clean Energy Plan Stakeholder Engagement Group, the Community Benefits and Indicators Advisory Group, and the Tribal Nations Engagement Clean Energy Plan Engagement Series.

On October 25, 2024, the Company received written comments from the City of Portland's Bureau of Planning and Sustainability on the draft filing for the Wattsmart Battery Program. PacifiCorp replied to those comments in a subsequent email.

On October 30, 2024, PacifiCorp received written comments from the "Joint Organizations" of Sierra Club, MCAT, CUB and OSSIA. A meeting held by the Company to discuss the comments is expounded upon below.

On October 31, 2024, PacifiCorp participated in a two-hour work session with the Energy Trust of Oregon. The Wattsmart Battery Program was highlighted as an opportunity for collaboration.

On October 31, 2024, the Company received written comments from ETO on the draft filing for the Wattsmart Battery Program. PacifiCorp replied to those comments in a subsequent email.

On November 1, 2024, the Energy Trust of Oregon and PacifiCorp met to further discuss opportunities and barriers to stacking the benefits of respective battery storage programming for customers.

On November 4, 2024, PacifiCorp received written comments from OPUC Staff on the draft filing for the Wattsmart Battery Program. PacifiCorp replied to those comments in a subsequent email and in meetings identified in this Exhibit.

On November 7, 2024, PacifiCorp met with OPUC Staff to discuss details of the Wattsmart Battery Program.

On November 12, 2024, PacifiCorp met with Portland General Electric to discuss the similarities, differences, barriers and opportunities related to respective battery storage programs/pilots.

On November 15, 2024, PacifiCorp again met with OPUC Staff to discuss the Wattsmart Battery Program.

On November 18, 2024, the Company met with ETO to discuss opportunities to collaborate and elevate the Wattsmart Battery Program alongside existing ETO battery storage incentives.

On November 18, 2024, PacifiCorp received additional comments from OPUC Staff on the draft filing for the Wattsmart Battery Program. PacifiCorp replied to those comments in the November 19 meeting.

On November 19, 2024, PacifiCorp met with OPUC Staff to discuss the Wattsmart Battery Program.

On November 21, 2024, PacifiCorp met with ETO for a second 2-hour working session which included further conversation and planning surrounding battery storage programming.

On November 21, 2024, the Company met with OPUC Staff about demand response programming, including further details about the Wattsmart Battery Program.

On November 26, 2024, PacifiCorp met with ETO to discuss the intake process for customer participation in the Wattsmart Battery Program.

On December 10, 2024, the Company again met with ETO to further discuss the process by which incentives are provided to customers purchasing battery storage in Oregon.

On December 16, 2024, PacifiCorp held another meeting to discuss final details related to the filing, including changes to the cost effectiveness modeling.

Exhibit B

Wattsmart Battery Program Website Content

Exhibit B

Wattsmart Battery Program Website Content

Please follow the link below to the website for the Wattsmart Battery Program. With the exception of the replacement of Pacific Power's branding for Rocky Mountain Power as is seen on this page, all content will otherwise be fully replicated for Oregon customers.

[Wattsmart Battery program](#)