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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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| In the Matter of the Rocky Mountain Power Demand-Side Management 2010 Semi-Annual Forecast | DOCKET NO. 10-035-57 RE: 09-035-T08 COMMENTS OF UTAH CLEAN ENERGY AND SOUTHWEST ENERGY EFFICIENCY PROJECT |
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Background

On November 1, 2011, Rocky Mountain Power (the Company) filed with the Commission a forecast of expenditures for approved Demand-Side Management (DSM) programs and their acquisition targets for calendar year 2012. The Company also filed its semi-annual Utah DSM tariff rider balancing account analysis, with actual results through September 2011 and projections through December 2012. This filing was prepared pursuant to Commission Order in Docket No. 09-035-T08, in which the Commission approved a stipulation requiring the Company to file, by November 1st of each year, forecasts of expenditures for approved DSM programs as well as acquisition targets.

On November 3, 2011, the Commission issued an Action Request to the Division of Public Utilities (Division) for a Review of and Recommendation on this filing. This Action Request is due December 1, 2011.

On November 11, the Company responded to a data request from the Southwest Energy Efficiency Project (SWEET) and explained that the projected 2012 savings reported in the November 1st filing were a combination of net and gross savings (depending on the program) as measured at the generator, consistent with the Company's DSM Annual Reporting conventions. The Company further explained that it does not have a breakdown of forecasted gross and net savings (net of free ridership).

On November 18, Utah Clean Energy submitted a discovery request to the Company requesting more information regarding the Company's November 1st semi-annual report filing.

On November 23, the Company filed, in Advice No. 11-13, a request to reduce the Schedule 193 (DSM surcharge) collection rate from approximately 3.6 percent of customer bills to approximately 2.4 percent.

Comments on the November 1, 2011 semi-annual report of DSM program expenditures and forecasts

As mentioned above, the Company's November 1st filing contained a forecast of expenditures for approved Demand-Side Management (DSM) programs and their acquisition targets for calendar year 2012 as well as tariff rider balancing account analysis. As clarified by the Company's response to SWEET's discovery request, the forecasted savings numbers represent a combination of net and gross savings estimates, as measured at the generator.

Utah Clean Energy and SWEET recommend that the Commission require the Company to include the following additional information, which we requested of the Company in a discovery request dated November 18, 2011, be included in subsequent reports filed pursuant to Commission order in Docket 09-035-T08:

1. For each of the Company's Utah DSM programs, both projected net and gross savings estimates for the next calendar year, at both the customer and generator levels.
2. For each of the Company's Utah DSM programs, the Company's planned expenditures to achieve the savings projected in Number 1, above.
3. For each of the Company's Utah DSM programs, the most recent estimates of net and gross savings for the current year, for as many months of the year as possible, at both the customer and generator levels.
4. For each of the Company's Utah DSM programs, the planned budget and currently anticipated expenditures for the current year. For those programs for which the anticipated budget is less than the planned budget, an explanation of why the Company is likely to be under budget and what steps if any the Company is taking to increase program participation in the future.

Utah Clean Energy and SWEEP believe this information will prove useful in evaluating the Company's portfolio of DSM programs for improvement. With the requested information, we can get a clearer picture of projected and actual expenditures and savings in order to provide more productive input as members of the DSM Advisory Group.

Utah Clean Energy and SWEEP further request that this information be presented to the DSM Advisory Group at the first DSM Advisory Group meeting following the publication of the semi-annual review and forecast.

Comments on the Company's application for an adjustment in the DSM tariff rider collection rate

In its November 1st report, the Company noted that it was preparing an application to reduce the DSM tariff rider collection rate. Prior to Utah Clean Energy's submittal of these comments, the Company, on November 23rd, filed an Advice Letter (Advice No. 11-13) with the Commission to reduce the Schedule 193 DSM tariff collection rate from approximately 3.6% to 2.4% of monthly bills, effective January 1, 2011.

Utah Clean Energy and SWEEP request that the Company, before submitting future adjustments to its DSM tariff to the Commission for approval, seek and receive input from Utah Clean Energy and SWEEP, as other interested parties, as required by Utah Code Section 54-7-12.8(3)(c).

Respectfully submitted this 1st day of December, 2011.

UTAH CLEAN ENERGY

/s/ _____

Sophie Hayes

Attorney for Utah Clean Energy

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by email this 1st day of December, 2011, to the following:

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