ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

201 South Main, Suite 2300
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June 24, 2010

VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Julie P. Orchard
Commission Secretary

Re: Advice No. 10-08

Enclosed for filing are an original and two copies of proposed tariff sheets associated with Tariff P.S.C.U No. 47 of PacifiCorp, d.b.a Rocky Mountain Power, applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405D, Rocky Mountain Power (the "Company") states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Company will also provide an electronic version of this filing to psccal@utah.gov. The Company respectfully requests an effective date of July 24, 2010 for these changes.

Fourth Revision of Sheet No. 115.1	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers
Second Revision of Sheet No. 115.5	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers
Second Revision of Sheet No. 115.7	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers
Second Revision of Sheet No. 115.8	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers
Second Revision of Sheet No. 115.9	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers
Second Revision of Sheet No. 115.10	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers

First Revision of Sheet No. 115.11	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers
First Revision of Sheet No. 115.12	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers
First Revision of Sheet No. 115.13	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers
Original Sheet No. 115.14	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers

Through this filing, the Company is proposing modifications to the Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers program ("FinAnswer Express"), which is administered through Schedule 115. The proposed modifications are intended to align the FinAnswer Express program qualifications with changes to standards that took effect January 1, 2010 and add a new part load cooling efficiency metric used to qualify efficient cooling equipment eligible for incentives. The proposed modifications are detailed below.

Lighting

The proposed changes increase the minimum wattage for pulse start metal halide fixtures installed in new construction. This change aligns equipment eligible for incentives with the Energy Security and Independence Act of 2007's mandate for a graduated phase-out on the manufacture and import of metal halide fixtures with ballasts that do not meet minimum ballast efficiency standards (i.e. most magnetic probe start ballasts).

Motors

Three changes are proposed for this equipment category:

1) Expand to include premium efficiency motors up to 500 horsepower to align with current NEMA Premium size categories.
2) Add a sunset date for incentives for premium efficiency motors effective December 19, 2010 when AC induction motors up to 500 horsepower will be required to meet NEMA Premium efficiency standards by the 2007 Energy Security and Independence Act.
3) Add a Green Motor Rewind option, including incentives for customers and motor service centers, so this new measure is in place in advance of phasing out incentives for premium efficiency motors. A green motor rewind is the process whereby a used motor is rebuilt in a controlled and measured environment which results in the rebuilt motor being as energy efficient as the existing design of the motor allows. It is standard practice for larger

motors to be rewound instead of replaced and this program feature is designed to prevent the 1-2% loss that typically occurs during standard practice rewinds. A leading proponent of green motor rewinds is Green Motors Practices Group™ and additional information including a roster of approved motor service centers can be found at: http://www.greenmotors.org.

HVAC

Four changes are proposed for this equipment category:

1. Remove incentives for the existing $50/ton incentive tier for equipment that is required by federal efficiency standards in 2010.
2. Add equipment efficiency tiers that align with CEE Tiers 2 and 3 and provide incentives of $75 and $100/ton respectively.
3. Add a new size category for split system and single package unitary equipment to align with minimum efficiency requirements for units ≥ 760,000 btu/hr.
4. Add the new Integrated Energy Efficiency Ratio (IEER) metric to the air conditioning equipment minimum efficiency requirements in Table 3a. These values will be an alternative to the current Integrated Part-Load Value (IPLV) values used to determine equipment eligibility for some air conditioners and heat pumps.

IEER is a new part load cooling metric that replaces the previous IPLV metric. The proposed change aligns with the manufacturer's practice of providing the IEER rating instead of IPLV rating for new equipment lines. For older models, the IPLV rating is available, but not an IEER rating. The addition of this IEER rating will permit the program to provide incentives for high efficiency equipment rated using either metric.

The Consortium for Energy Efficiency is currently reviewing the IEER metric and manufacturer equipment data which is available for new models as of January 1, 2010, and expects to have a revised specification for unitary air conditioners and heat pumps later this year. Until then, as recommended by CEE, the Company proposes to use the values on Table 3a for IEER that are based on Air-Conditioning Heating and Refrigeration Institute's (AHRI) recommendation to ASHRAE.

To maintain continuity of the program offer for high efficiency cooling equipment during the start of the cooling season, the Company requests approval to pay customer incentives for eligible cooling equipment, purchased between January 1, 2010 and the effective date of the order in this filing, where eligibility is determined using an IEER rating meeting the minimum efficiency requirements in Table 3a. Incentives for eligible cooling equipment purchased during this period will be paid to customers after a Commission order approving these changes is received by the Company.

Mechanical and Other Energy Efficiency Measures

Three changes are proposed for this category of measures:

1. Remove two programmable thermostat measures due to changes in code requirements and Energy Star standards.
2. Remove the first incentive tier (Tier 1) for solid door refrigerators and freezers to align with new federal minimum efficiency standards.
3. Modify the minimum efficiency requirement for solid door refrigerators and freezers to state “ENERGY STAR®” so the requirements automatically align with Energy Star as it evolves. Expand the cubic volume tiers from three to four to align with the “ENERGY STAR®” categories, add an incentive for the new tier and align incentives across all four tiers.

Miscellaneous Changes

Minor administrative changes proposed are also include:

a) Add Schedule 15 to the applicable section on page 1 of Schedule 115.
b) Move electronically commutated motors and HVAC variable frequency drives to a new incentive table for other motor measures
c) Other minor language changes

Cost Effectiveness

The proposed changes are not expected to materially affect cost effectiveness of the FinAnswer Express program. Cost effectiveness for the 2009 FinAnswer Express program was provided in the 2009 demand-side management annual report filed with the Commission on March 31, 2010. In support of the modifications proposed herein, Rocky Mountain Power provides an assessment of the measure level cost effectiveness for the two measures; motors and HVAC that are expected to have the largest impact as Attachment A. The electronic models used to generate these results are provided as Attachment B, C and D. Data for the motors and HVAC measures is provided in Attachment E.

The decrement values generated by the 2008 IRP were used as the avoided costs and are found on p. 285 of Volume II of the 2008 IRP. Two sets of decrement values, each tracking different carbon assumptions were generated through the modeling. The Company used the $45 ton stream of values in analyzing these program changes in recognition of the “no carbon” nature of energy efficiency.

Lighting measures contributed more than 80% of the 2009 savings and this is generally consistent with prior years. These changes do not materially affect the lighting component of the program. In 2009, motors and HVAC measures represented approximately 14% of the total savings and these proposed changes impact only a subset of these two measure groups. The magnitude of the savings from these measures is small when compared to the entire program and the whole program should be relatively insensitive to the proposed changes. As such, separate sensitivity analysis is not provided.

Projected Program Energy Savings

The FinAnswer Express program's estimated contribution to the 2010 IRP targets is 39,520 MWH. The Company identified this amount in its 2010 DSM Projected Expenditures and Savings report which was provided to the Commission on November 2, 2009.[1]

Program Evaluation

A formal third party impact and process evaluation is currently underway for this program for program years 2005-2008. The draft report of the evaluation is expected to become available during the third quarter of 2010. Final results of the of the evaluation will be provided to the Commission, Division of Public Utilities, Office of Consumer Services and the Demand Side Management Advisory Group when available. Evaluations for the 2009 year will be started in 2011.

The program will continue to be funded by revenue from the existing DSM surcharge, administered through Schedule No. 193. The Company is not proposing an adjustment to the DSM surcharge as part of this filing. The modifications proposed herein were discussed with the Demand-side Management Advisory Group during meetings on October 28, 2009 and February 23, 2010 and a draft filing was provided to the group on June 3, 2010.

The electronic models provided as Attachments B, C and D contain proprietary information that would be detrimental to The Cadmus Group, Inc, the contractor who prepared the cost effectiveness results, if disclosed to a competitor. Accordingly, Rocky Mountain Power is filing Attachments B, C and D under seal, and requesting that the Commission require any party who wishes to view these attachments execute a Confidential Information Certificate. For the Commission's convenience the Company has provided as Attachment F a draft Confidential Information Certificate with this filing.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred):	datarequest@pacificorp.com aaron.lively@pacificorp.com daniel.solander@pacificorp.com
By regular mail:	Data Request Response Center PacifiCorp 825 NE Multnomah Blvd., Suite 2000 Portland, OR 97232

[1] Refer to Docket No. 09-35-T08

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Informal inquiries may be directed to Aaron Lively, regulatory manager, at (801) 220-4501.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation

Enclosures

Cc: Dennis Miller/DPU
Cheryl Murray/OCS