



201 South Main, Suite 2300  
Salt Lake City, Utah 84111

April 6, 2012

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

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

Attention: Gary Widerburg  
Commission Secretary

**Re: Advice No. 12-03  
Removal of the Schedule 192 Self-Direction Credit and Schedule 193  
Demand-side Management Cost Adjustment Expiration Date**

Enclosed for filing are an original and two copies of proposed tariff sheets associated with Tariff P.S.C.U No. 48 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 [psc@utah.gov](mailto:psc@utah.gov).

First Revision of Sheet No. 192.1	Schedule 192	Self-Direction Credit
First Revision of Sheet No. 192.4	Schedule 192	Self-Direction Credit
First Revision of Sheet No. 192.5	Schedule 192	Self-Direction Credit
First Revision of Sheet No. 192.9	Schedule 192	Self-Direction Credit
First Revision of Sheet No. 193.1	Schedule 193	Demand Side Management (DSM) Cost Adjustment

The purpose of this filing is to request the removal of the March 31, 2014 expiration from Schedule 192 Self-Direction Credit (the "Self-Direction Credit") and Schedule 193 Demand-side Management Cost Adjustment (the "DSM Cost Adjustment") (collectively referred to herein as the "Schedules") and request administrative changes to the DSM Cost Adjustment.

Removal of the March 31, 2014 Expiration

As the expiration date in the DSM Cost Adjustment approaches it is becoming a barrier to participation in the Self-Direction Credit program and is curbing participation levels. This is

because customers participating in the Self-Direction Credit program are allowed to self-direct the charge applied in their bill from the DSM Cost Adjustment into cost-effective demand-side management projects within their own facilities.

To avoid future conflict should either of the Schedules terminate, the Company requests removing the language regarding the expiration and adding a provision to the Self-Direction Credit tariff that allows for customers to receive anticipated benefits from their participation until identified funds have been recovered by the customer. In the event of termination of the DSM Cost Adjustment, the Company requests that the expense associated with the on-going Self-Direction Credit be deferred and recovered through general rates.

To ensure the Self-Direction Credit program and the DSM Cost Adjustment receive appropriate review, the Company requests that the Commission order a review of both to be completed and filed with the Commission by March 31, 2014.

#### Administrative Changes to Schedule 193 DSM Cost Adjustment

On March 14, 2012 the Company met with the DSM Advisory Group to discuss administration of the DSM Cost Adjustment and parties identified some improvements for administering the program and ensuring fewer changes to the DSM Cost Adjustment collection rate.

Currently, the DSM Cost Adjustment collection rate is set at a rate that will collect enough revenue to ensure the DSM balancing account will be at or near zero, after a 12-month period, based on a forecast of expenditures associated with existing programs. The Company requests that the forecast be based on the expenses associated with existing programs; including approved modifications and anticipated modifications that have been reviewed by the DSM Advisory Group (or Demand-side Management Steering Committee), additions and deletions; new programs and/or eliminated programs as long as they are reasonable and have been reviewed with the DSM Advisory Group (or Demand-side Management Steering Committee).

Further, should the Company forecast a 12-month balance, in its quarterly DSM balancing account filings for 3 consecutive quarters in excess of plus-or-minus the greater of \$5,000,000 or 10% of the forecasted expenditures or should the DSM balancing account in any given quarter have a 12-month balance plus-or-minus 15% of the forecasted expenditures the Company would file either to adjust the DSM Cost Adjustment collection rate or to extend the then current collection rate given anticipated changes in the expenses and/or revenue.

These changes are intended to minimize the frequency with which the DSM Cost Adjustment collection rate is adjusted to cover costs for program portfolio changes.

The requests outlined in this filing were vetted by the DSM Advisory Group subcommittee on Schedule 192/193 issues. Participants on the subcommittee include representatives from the Division of Public Utilities, the Office of Consumer Services, Utah Clean Energy, Southwest Energy Efficiency Project and Western Resource Advocates. In addition to discussions held on

January 6, February 8 and March 14, 2012, the participants were provided the opportunity to review and comment on a draft of this filing.

The Company respectfully requests an effective date for the changes to the Schedules of May 6, 2012, so as to reduce the impacts of the impending expiration date on current and prospective self-direct program participation.

In accordance with Section 54-7-12.8(3)(a)-(c) of the Utah Code, Rocky Mountain Power circulated a draft of this filing with the Division of Public Utilities and the Office of Consumer Services prior to submitting this filing with the Commission.

Communications regarding this filing should be addressed to:

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In addition, Rocky Mountain Power respectfully requests that all data requests regarding this filing be addressed to:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
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By regular mail: Data Request Response Center  
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Informal inquiries may be directed to Dave Taylor, regulatory manager, at (801) 220-2923.

Sincerely,

Carol L. Hunter

Vice President, Services

cc: Division of Public Utilities  
Office of Consumer Services

Enclosures