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April 19, 2012

***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: Gary Widerburg
Commission Secretary

Re: Advice No. 12-05
Modifications to the Commercial and Industrial Energy Efficiency Incentives
Optional for Qualifying Customers, Schedule 115

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 (“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. The Company respectfully requests an effective date of May 19, 2012 for these changes.

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Original of Sheet No. 115.24	Schedule 115	Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers

Through this filing the Company is requesting approval to modify the Commercial and Industrial Energy Efficiency Incentives Optional for Qualifying Customers (“FinAnswer Express”) program, which is administered through Schedule 115. The FinAnswer Express program is available to commercial, industrial and agricultural customers and offers incentives for prescriptive energy efficiency measures. The program also offers custom incentives for energy efficiency measures not listed in the program incentive tables. The current program offers incentives for lighting, motors, heating ventilation and air conditioning (“HVAC”), and a short list of other measures. Incentives are available for both retrofit projects and new construction/major renovation projects. The FinAnswer Express program was last changed in Docket No. 10-035-T09 effective July 24, 2010.

Requested Program Modifications

The modifications to the FinAnswer Express program requested by the Company in this filing are intended to align the FinAnswer Express program with upcoming changes to codes, standards, third party specifications and new market data and increase the comprehensiveness of the program while maintaining or improving cost effectiveness.

Lighting Incentives

Linear fluorescent lighting is undergoing a major transition as a result of long anticipated federal lighting standards that take effect July 14, 2012. The standards apply to manufacturers and imports. When the new standards take effect, general service fluorescent lamps manufactured or imported for sale in the United State will need to meet higher efficacy (lumen/watt)

requirements. This change will have a significant effect on the FinAnswer Express program in the next three years. During 2012 and 2013, the company expects to see an increase in lighting retrofit projects as customers replace older T12 lighting. During 2014, the company expects to increase the deemed baseline for T12 retrofits, thereby decreasing the available savings for this type of project, resulting in a decrease in overall program savings compared to 2013. Table 1 highlights the proposed lighting measure changes, including modifications to align with changes in federal lighting standards.

**Table 1
Retrofit Lighting Changes**

Measure	Change	Reason for Change
All	<p>Modify the incentive table structure to provide incentives based on the fixture installed.</p> <p>Pay incentives for many measures on a per lamp basis, rather than a per fixture basis.</p>	<p>To streamline and simplify the program.</p> <p>With the vast number of fixture retrofit combinations and increasing project volume, a growing number of retrofits do not meet the listed “replace” and “with” fixture criteria necessary to qualify for prescriptive incentives. Providing incentives based on the fixture installed, regardless of the existing fixture, allows incentives to be more easily specified and expands the capabilities of the program to deal with a broader array of existing and proposed fixture types.</p> <p>Projects will be required to save energy relative to the baseline lighting system to qualify for the listed incentives. Energy savings and measure costs will continue to be reported based on the existing / baseline and new lighting fixture inventories, hours of operation and invoice costs using an updated version of the current retrofit lighting tool.</p>
T8 Fluorescent	<p>Modify the eligibility requirements to match the Consortium of Energy Efficiency’s (CEE) high performance/reduced wattage T8 lamp and ballast qualifying requirements.</p> <p>Add a category for continuous operation applications.</p>	<p>Aligning with CEE specifications will allow customers and participating vendors to choose lamps and ballasts from a qualifying list. Both the lamp and ballast must be CEE qualified, but they do not need to meet a qualifying combination. This flexibility will allow customers to choose the most appropriate combination for the space or application.</p> <p>This simplifies participation and streamlines administration. It will allow requirements to evolve as CEE specifications are updated. It also aligns with other utility demand-side</p>

		<p>management (DSM) programs.</p> <p>Adding the Continuous Operation category allows incentive levels to reflect the higher savings available given the higher operating hours. Allows for a better alignment with incentives for other types of lighting that are often used in continuous operation applications.</p>
Standard T8 Fluorescent	<p>Change the incentive to \$3 per lamp installed and add a sunset date of July 14, 2012.</p> <p>Discontinue incentives for delamping for standard T8s.</p>	<p>To align with the effective date of new federal efficacy standards for General Service Fluorescent Lamps (GSFL).</p> <p>The Company is encouraging customers with existing T12 or older T8 linear fluorescent lighting to retrofit to higher efficiency lighting before federal lighting standards take effect July 14, 2012. Incentives for most Standard T8s are first reduced and then eliminated as part of this phased transition. Delamping for Standard T8s is also discontinued as part of this transition.</p>
Premium T8	<p>Change the incentive to \$7 per lamp installed for upgrades to premium T8 (either high lumen output or reduced wattage).</p> <p>Change the incentive to \$21 per lamp removed for premium T8 upgrades with delamping.</p>	<p>Boost the attractiveness of the premium option to encourage customers to step up to premium and to encourage early replacement of T12 lighting.</p> <p>High performance T8s have higher light output than T12 lamps, so upgrading to premium and delamping is an excellent choice for many customers. Incentives for this option are set to result in the best estimated payback of the T12 retrofit options.</p>
T8 Relamp	<p>Change the incentive from \$0.50 per lamp to \$0.25 per lamp.</p>	<p>This proposed change reflects program operating experience that indicates relamps generally occur at the end of the useful life of the existing lamp. The prior incentive was based on the incremental cost of the materials plus labor to install. The proposed incentive is based on only the material cost, because the labor for an end-of-useful life retrofit is not considered an eligible project cost.</p>
T5	<p>Change the incentive to \$5 per lamp installed (standard T5)</p>	<p>Incentive level is appropriate given the costs and the savings for upgrades to T5, and competitive with T8 offerings.</p>
Screw-in CFL	<p>Add a sunset date of January 1, 2014.</p>	<p>To align with the effective date of new federal efficacy standards for General Service Incandescent Lamps (GSIL).</p>
T8 High Bay	<p>Change incentives to \$20 per lamp for high-bay T8 and</p>	<p>Offering incentive to upgrade older HID technology beyond pulse start metal halide, the</p>

<p>T5 HO Ceramic Metal Halide</p>	<p>T5HO fluorescents. Change the incentive for ceramic metal halide.</p>	<p>least cost replacement, which is subject to federal manufacturing standards.</p>
<p>Pulse Start Metal Halide</p>	<p>Remove the incentive for metal halide pulse-start fixtures 150W-500W.</p>	<p>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). Changes to manufacturing requirements do not have an immediate effect on the availability of equipment in the marketplace and incentives are necessary for a period of time to encourage adoption of higher-efficiency products while lower-efficiency technologies remain available.</p>
<p>New Lighting Measures</p>	<p>Add cold cathode and induction lighting measures. Add light-emitting diode (LED) measures in integral screw-in lamps, recessed downlight, outdoor pole, parking garage, high and low-bay.</p>	<p>Include an offer for new lighting technology available in the marketplace. The proposed changes for LED lighting define the eligibility criteria for incentives as fixtures that comply with Design Lights Consortium or ENERGY STAR LED performance requirements and are on their list of qualifying products.</p>
<p>Lighting control</p>	<p>Change incentives for lighting occupancy sensors from \$25 or \$30 per sensor to \$75 per sensor and provide an additional incentive for dimming/programmable ballasts necessary for lighting controls.</p>	<p>To increase participation in lighting controls. To streamline the process for customers, the Company plans to allow customers who are installing lighting controls only to apply for incentives after purchase and installation.</p>
	<p>Modify the existing photocell measure to a daylighting control measure for interior lighting and change the incentive from \$20 to \$75 per sensor.</p>	<p>This change focuses this measure on daylighting control for interior lighting.</p>
	<p>Add an advanced daylighting control measure with savings reporting based on deemed percent savings.</p>	<p>Advanced daylighting control incorporates both occupancy control and daylighting control. The incentive is \$150</p>

	Discontinue incentives for time clock controls.	Based on industry feedback from Energy Efficiency Alliance (EEA) coordinators and EEA participants, timeclocks/sweep controls have become standard in the industry and common practice for large general illuminance retrofit projects. In addition, timeclocks are either mandatory or a compliance option according to state energy code.
Non-General Illuminance Lighting (i.e. cabinet signs, channel letter signs)	Allow non-general illuminance lighting project participants to apply via a post-purchase application process.	To streamline the participation process and administration. These projects are generally installed on a stand-alone basis and can utilize post-purchase delivery.

Table 2 highlights the proposed changes to new construction and major renovation lighting measures.

**Table 2
New Construction/Major Renovation Lighting**

Measure	Change	Reason for Change
Interior Lighting	Modify to a 'pay for savings' approach, relative to an appropriate baseline (defined by state energy code), rather than a pay per fixture approach.	This will provide more flexibility and incentive to incorporate efficient measures into the lighting design.
Exterior Lighting	Add prescriptive incentives (with savings reporting relative to an appropriate baseline) for high-efficiency exterior lighting technologies, including: induction, CFL, LED, and lighting controls not required by energy code.	To increase the comprehensiveness of the program. To include an offer for new lighting technology available in the marketplace.

Table 3 highlights the proposed changes to the green motor rewind incentive measures.

**Table 3
Motors Incentives**

Measure	Change	Reason for Change
Green Motor Rewind	Expand the eligibility criteria for Green Motor Rewinds from 15-500 horsepower to	The broad based regional green motor rewind program managed by the Green Motors Practices Group allows motors up to 5,000 horsepower,

	<p>include motors from 15-5,000 horsepower.</p> <p>Clarify that motors may be installed or placed in inventory for future use.</p>	<p>and the proposed change allows for consistency with the broader offering in the marketplace. Deemed savings and costs for Green Motor Rewinds reflect the current values from the Regional Technical Forum.</p> <p>Motor management best practices include stocking spares for critical motors. Allowing green rewind motors to be placed in inventory allows customers to maintain best practices for motor management. Green rewinds are labeled at the rewind shop with a green rewind nameplate for ease of identification in the future.</p>
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Note: As of December 19, 2010 incentives are no longer available for NEMA Premium Efficiency motors.

HVAC Incentives

Table 4 highlights proposed modifications for the HVAC measure table.

**Table 4
HVAC Changes**

Measure	Change	Reason for Change
Unitary commercial air conditioners and heat pumps	<p>Revise eligibility requirements to align with CEE high-efficiency specifications.</p> <p>Update measure costs.</p>	<p>Current program minimum efficiency requirements are based on CEE specifications. To maintain alignment with CEE specifications as they evolve, the company is proposing to list the CEE tier in the incentive table rather than the efficiency ratings. Initially, the pending CEE high efficiency specifications will be used.</p> <p>Eligibility requirements can track CEE specification changes without a program filing.</p> <p>Update measure costs to reflect updated cost data.</p>
Unitary air conditioners	Reduce incentives by \$25 per ton.	With updated draft CEE specifications incorporating the IEER metric, a completed comprehensive review of the category was performed. Recommended an adjustment to incentive to maintain cost effectiveness.
Packaged terminal air conditioners (PTAC)	Reduce incentives by \$25 per ton.	To align with the reduced savings that will be available given the coming federal standards change (see below).
Packaged	Revise minimum efficiency	To accommodate the increased federal minimum

terminal heat pumps and air conditioners (PTHP and PTAC)	requirements.	efficiency requirements to be enacted in September 2012.
Heat pumps, ground-source or groundwater-source	Add ground-source and groundwater-source heat pumps. Add ground-source or groundwater-source heat pump loops.	To increase the comprehensiveness of the program.

Mechanical and Other Energy Efficiency Measure Incentives

In the current Schedule 115, the Mechanical and Other Energy Efficiency Measures table includes a small number of measures from several categories including HVAC, building envelope, food service, and office equipment. To increase participation and the comprehensiveness of the program and streamline program administration, the Company is requesting approval to expand these measure categories. Given the number of new measures in each, the Mechanical and Other Energy Efficiency Measures (“EEM”) table will be replaced with a new table for each category.

Most of the measures listed in the current Mechanical and Other EEM table have been updated and moved into proposed new measure tables as summarized in Table 5 below. Information on updates to these measures is provided in the description of proposed changes for each of the new measure tables.

**Table 5
Summary of Proposed Other Energy Efficiency Table Dissemination and Changes**

New Incentive Table	Measures	
Other HVAC	New measures.	Indirect-direct evaporative cooling, room air conditioner, 365/366 day programmable thermostat.
	Existing measures moved from Mechanical and Other EEM table.	Evaporative cooling, chillers, occupancy based PTHP/PTAC control.
Food Service Equipment	New measures.	Residential refrigerators/dishwashers used in a business, ENERGY STAR commercial refrigerators/freezers, air-cooled ice machines, commercial dishwashers, electric insulated holding cabinets, electric steam cookers, electric commercial fryers, electric convection ovens, electric griddles, electric combination

		ovens, and LED refrigeration case lighting and controls.
	Existing measures moved from Mechanical and Other EEM table.	Vertical solid door refrigerator/freezer, beverage or refrigerated display machine occupancy sensor.
Building Envelope	New measures.	Roof/attic insulation, wall insulation, windows, window film.
	Existing measures moved from Mechanical and Other EEM table.	Cool roof.
Office Equipment	New measures.	Network PC power management software.
	Existing measures moved from Mechanical and Other EEM table.	Plug load occupancy sensor.

Table 6 highlights the proposed changes to other HVAC incentives.

**Table 6
Other HVAC Incentives**

Measure	Change	Reason for Change
Evaporative Cooling.	Increase the incentive rate for evaporative cooling systems from \$0.02 per cubic feet per minute (“CFM”) to \$0.06 per CFM.	To increase participation. A lower installation cost than standard air conditioning and incentives equivalent or higher than those provided for unitary air conditioning will encourage greater participation. (\$0.06 per CFM is approximately \$78 per ton)

Building Envelope Incentives

Add new building envelope measures table to the FinAnswer Express program, which include: attic/roof insulation, wall insulation, high-efficiency windows, and reflective window film. Continue to offer the incentives for reflective roofing products (“cool roofs”) with no changes to eligibility requirements, savings or costs.

Food Service Equipment Incentives

- Add new food service measures table to the FinAnswer Express program, which includes residential refrigerators/dishwashers used in a business, ENERGY STAR commercial refrigerators/freezers, air-cooled ice machines, commercial dishwashers, electric insulated holding cabinets, electric steam cookers, electric commercial fryers, electric convection ovens, electric griddles, electric combination ovens, and LED refrigeration case lighting.
- Discontinue offering incentives for beverage machine occupancy sensors and replace it with a new measure for high-efficiency refrigerated beverage vending machines until federal code changes in 2012.
- Discontinue offering incentives for refrigerated display occupancy sensors and replace it with a new measure for occupancy sensors in refrigerated cases with LED lighting.

- Residential dishwasher and refrigerator incentives within the FinAnswer Express program will align the program with the Company's Home Energy Savings program and provide for the acquisition of additional cost effective savings.

Office Equipment Incentives

- Expand the measure for Plug Load Occupancy Sensors to include Smart Plug Strips which limit stand-by power consumption of plug-load appliances by completely switching off power to the strip when a minimum electrical load is sensed.
- Add network PC Management Software measure.

Additional New Measure Categories

To further increase participation and the comprehensiveness of the program and streamline program administration, the Company is requesting approval to add new measures in the following additional measure categories: appliances, irrigation, dairy/farm equipment, and small compressed air.

Appliance Incentives

Add a new table of measures to the FinAnswer Express program, which includes commercial clothes washers, residential clothes washers used in a business, electric storage water heaters and room air conditioners. Appliance incentives within the FinAnswer Express program will align the program with the Company's Home Energy Savings program and provide for the acquisition of additional cost effective savings.

Irrigation Incentives

Add a new incentive table of measures to the FinAnswer Express program, which includes individual sprinkler components (nozzles, pressure regulators, drains and gaskets, and sprinklers), water distribution equipment (pipe repair, center pivot base boot gasket, drop tubes, wheel-line hubs/levelers/feed hose) and VFDs on irrigation pumps.

Farm/Dairy Equipment Incentives

Add a new incentive table of measures to the FinAnswer Express program, which includes automatic milker takeoffs, VFD's for dairy vacuum pumps, milk precoolers, agricultural engine block heater timers, circulating fans, heat reclaimers, high-efficiency ventilation systems, and programmable ventilation controllers.

Compressed Air Incentives

Add a new incentive table of measures to the FinAnswer Express program, which includes low-pressure drop filters, addition of receiver capacity, refrigerated cycling dryers, variable frequency drive (VFD)-controlled air compressors, zero-loss condensate drains, and outside air intake. Compressed air systems with a total operating capacity of 75 horsepower or less will be eligible

for post-purchase prescriptive incentives. Multiple compressor systems are allowed, except for the VFD-controlled compressor measure, where eligibility is limited to systems with a single operating compressor with capacity less than or equal to 75 hp. For Zero-Loss Drains, there is no limitation on compressor size to be eligible for incentives.

The Energy FinAnswer program has been successful at helping customers with larger compressed air systems identify and implement energy-efficiency opportunities. The Energy FinAnswer approach is less suitable for customers with smaller compressed air systems with lower savings potential. Adding compressed air measures to FinAnswer Express will allow for a more streamlined approach for customers with smaller compressed air systems.

**Table 7
Other Proposed Changes**

Tariff section	Change	Reason for change
Applicable (sheet 1).	Add Schedule 31 as eligible for incentives.	There are a small number of customers receiving supplementary power on Schedule 31 and paying the Schedule 193 surcharge. By adding Schedule 31 to the list of eligible rate schedules, it will be clear these customers are eligible for the program as long as incentives are not used to offset costs for customer owned generation.
Incentive for Energy Efficiency Measures (sheet 3).	Increase the incentives for custom measures (Energy Efficiency Measures not listed in the incentive tables) from \$0.08/kWh to \$0.10/kWh annual energy savings.	Maintains alignment with planned changes for Energy FinAnswer.
Energy Efficiency Incentive caps table (sheet 4).	Modify the incentive caps table.	To add the new measure categories.
Incentive for Energy Efficiency Measures (sheet 5).	Revise the language regarding the deemed baseline for T12 lighting.	With the federal lighting standards changing in July 2012, the Company will need to make changes to the assumed T12 baseline after a transition time of approximately eighteen months. The timing and exact changes will be determined in collaboration with others for regional consistency, and the proposed tariff change at this time is to replace the baseline language in the tariff with language that provides for management of this information on the Company website.

In addition to the changes outlined above, other relatively minor changes to tariff language are proposed.

Projected Costs and Energy Savings

Projected costs and savings are summarized in the Table 8 below. These projections were used in the program cost effectiveness analysis. Annual kWh savings in the table below are at the customer meter and do not include a net-to-gross adjustment.

**Table 8
 Summary of Projected Costs and Savings**

	Total Utility Costs	Incentives	Annual kWh Savings
Year 1	\$ 5,362,806	\$ 2,272,546	38,143,733
Year 2	\$ 5,271,382	\$ 2,481,453	41,059,113
Year 3	\$ 5,053,021	\$ 2,182,817	33,494,119
Total	\$ 15,687,209	\$ 6,936,817	112,696,965

Cost-Effectiveness

The FinAnswer Express program is projected to remain cost effective with the changes proposed herein, and each of the measure groups passes the Utility Cost Test. The program level cost effectiveness includes all costs; the measure group level cost-effectiveness analysis excludes administrative costs. The 69% Load Factor East System Load Shape decrement values generated by the 2011 integrated resource plan (“IRP”) were used as the avoided costs and can be found on page 20 of the 2011 IRP Addendum. Decrement values were generated through the modeling for both a Medium Carbon Tax scenario (\$19/ton) and a No Carbon Tax scenario. The Company used the \$19/ton Medium Carbon Tax scenario stream of values for this analysis. The selection of these values was based on one of the key attributes of energy efficiency resources, i.e. it is “zero carbon”.

Projected 2012-2014 participation, assuming the proposed changes are in effect, was used for this analysis. In addition, the net-to-gross rates from the 2005-2008 FinAnswer Express program evaluation study are also utilized. Cost-effectiveness results are summarized below with details provided as Attachment A.

**Table 9
 Proposed FinAnswer Express Program Cost Effectiveness Summary**

Cost-effectiveness Test	Benefit/Cost Ratio
Total Resource Cost Test (PTRC) + Conservation Adder	2.33
Total Resource Cost Test (TRC) No Adder	2.12
Utility Cost Test (UCT)	4.60

Rate Impact Test (RIM)	1.05
Participant Cost Test (PCT)	2.32

Sensitivity Analysis

The FinAnswer Express program remains cost effective with the changes proposed herein under a variety of sensitivity scenarios. Sensitivity of the FinAnswer Express program to carbon costs was performed using the 2011 IRP decrement values based on the no carbon tax scenario found on page 17 of the 2011 IRP Addendum. These results are provided as Attachment B and can be compared with the results provided in Attachment A that utilize a \$19/ton medium carbon tax decrement value.

A second sensitivity on the projected 2012-2014 program participation was also performed and results are provided as Attachment C. These results can also be compared with Attachment B in terms of higher and lower program participation.

**Table 10
 Proposed FinAnswer Express Program Cost Effectiveness Scenarios Summary**

2011 IRP Cost	Medium	Low	Medium	Medium
Participation	Projected	Projected	10% higher	10% lower
PTRC	2.33	1.96	2.39	2.26
TRC	2.12	1.78	2.17	2.06
UCT	4.60	3.87	4.84	4.33
RIM	1.05	0.88	1.06	1.03
PCT	2.32	2.32	2.32	2.32

Program Evaluation

The FinAnswer Express program was last evaluated by an independent third party for projects completed from 2005 to 2008. The report, dated December 6, 2010, is posted on the Company website at [pacificorp.com](http://www.pacificorp.com)¹. A formal third party process and impact evaluation is currently underway for program years 2009-2011. Final results 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.

Recent Communication Regarding Proposed Changes

¹ Refer to the following link:
http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Demand_Side_Management/DSM_UT_Fin_Exp.pdf

Utah Public Service Commission

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The modifications proposed herein were discussed with the Demand-side Management Advisory Group during meetings on January 24, 2012 and February 8, 2012; a draft filing was provided to the group for comment on March 22, 2012.

The FinAnswer Express 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.

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

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Sincerely,

Carol L. Hunter
Vice President, Services

Enclosures

cc: Artie Powell/DPU
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