



State of Utah
Department of Commerce
Division of Public Utilities

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ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Energy Section Manager

Brenda Salter, Technical Consultant

Date: March 24, 2014

Re: **RMP Advice No. 14-01, Proposed changes to Schedule 114 – Air Conditioner Direct Load Control Program (A/C-DLC) (Cool Keeper Program)**

Docket No. 14-035-T01

RECOMMENDATION

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) approve Rocky Mountain Power's (RMP) proposed changes to the Cool Keeper Program.

ISSUE

On March 7, 2014, the Company filed updated tariff pages to Utah Tariff Schedule 114 Air Conditioner Direct Load Control Program. On March 7, 2014, the Commission issued an Action Request for the Division to investigate the proposed changes to Schedule 114 and report its findings and recommendation to the Commission by March 24, 2014. This memorandum represents the Division's response to the Commission's Action Request.

DISCUSSION

In its notice, the Company reports that the barriers that limit participation in the Cool Keeper Program also limit the potential benefit of the program. The Company is proposing to increase

the maximum commercial air conditioning unit sizing from 7.5 tons to 15 tons to remove a barrier to participation without increasing costs to the program. A 15 ton air conditioning unit utilizes the same installation procedures and equipment as the smaller units. The Company's third market vendor currently markets to commercial and industrial customers but has, based on the unit sizing, been limited in its marketing efforts. The Company notes that but for the current size limit, some commercial and industrial customers have equipment for separately zoned spaces that would qualify under the Cool Keeper program. Increasing the unit size will eliminate this unnecessary barrier without adversely affecting the cost effectiveness of the program.

The Company has included in this proposal a clarifying change to how qualifying equipment can be cycled. Also the Cool Keeper web page has changed based on a change in vendors.

The proposed changes were presented at the February 12, 2014 DSM Steering Committee Meeting and a general consensus was reached on the changes.

CONCLUSION

The Division has reviewed the proposed changes and recommends approving the changes to tariff Schedule No. 114, the Cool Keeper Program.

CC Kathryn Hymas, Rocky Mountain Power
Dave Taylor, Rocky Mountain Power
Michelle Beck, Office of Consumer Services
Service List