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May 7, 2014

***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

Attn: Gary Widerburg
Commission Secretary

RE: Advice No. 14-03
Updates to Schedule 140 – Non-Residential Energy Efficiency

Enclosed for filing are an original and five copies of modified tariff sheets associated with Tariff P.S.C.U No. 49 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 modified 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 June 6, 2014 for these changes.

Fifth Revision of Sheet No. B.1		Tariff Index
First Revision of Sheet No. 140.2	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.4	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.5	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.6	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.7	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.10	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.11	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.14	Schedule 140	Non-Residential Energy Efficiency
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First Revision of Sheet No. 140.23	Schedule 140	Non-Residential Energy Efficiency
Original of Sheet No. 140.24	Schedule 140	Non-Residential Energy Efficiency
Original of Sheet No. 140.25	Schedule 140	Non-Residential Energy Efficiency
Original of Sheet No. 140.26	Schedule 140	Non-Residential Energy Efficiency

The purpose of this filing is to propose changes to the wattsmart Business program defined in the Non-Residential Energy Efficiency tariff. The changes include a) updates to measures listed in incentive tables (Typical Upgrades), b) the addition of new Typical Upgrades in the incentive tables, and c) the addition of an enhanced incentive offer for small business customers.

Proposed changes to Typical Upgrade measures

The modifications to the wattsmart Business program Typical Upgrades requested by the Company in this filing are intended to align the program with changes to codes, standards, third party specifications and new market data and increase the comprehensiveness of the program while maintaining or improving cost effectiveness. The proposed changes include updates for existing measures as well as new measures.

The changes were informed by a review of applicable codes and standards, third party specifications such as Consortium for Energy Efficiency (CEE) and ENERGY STAR, past program participation, and vendor feedback. This type of review is completed on a periodic basis to keep existing program measures current and to add new measures as appropriate in order to maintain program relevancy and overall comprehensiveness. The last comprehensive review informed program changes to Schedule 115 (FinAnswer Express) that were approved effective May 19, 2012.

In an effort to maintain alignment with recent changes in federal lighting equipment efficacy standards, the Company plans to adjust the assumed baseline for linear fluorescent lighting retrofits from the current energy saving T12 lamp and magnetic ballast configuration to a 32W T8 lamp and electronic ballast configuration. The lighting baseline change decreases the baseline usage assumption from which program savings are calculated. This baseline change reduces the available savings from projects where efficient equipment is installed. The change is incorporated into the cost-effectiveness analysis accompanying this filing as an increase in utility costs per kWh.

Utah has adopted the 2012 International Energy Conservation Code (IECC 2012) effective July 1, 2014. The code includes Section C406, Additional Efficiency Package Options, for new construction. Section 406 of the IECC 2012 stipulates additional mandatory code requirements to be implemented beyond the mandatory provisions of the prescriptive efficiency requirements detailed in Sections 401-405. To comply with the code, customers must choose to implement one of three required options:

1. More efficient lighting equipment
2. More efficient HVAC equipment
3. Installation of renewable energy systems

For New Construction Typical Upgrade incentive applications, the Company plans to assume customers selected the more efficient lighting equipment option because this is estimated to be the most likely code compliance approach that will be selected by customers. Also, nearly all code-impacted spaces have lighting and some may not have HVAC (e.g. non-conditioned warehouses, parking garages). Effective July 1, 2014, energy savings for new construction lighting projects will be calculated using the more stringent lighting power density table in Section 406 as the baseline. HVAC savings will be based on the provisions of the prescriptive efficiency requirements in Section C403.

Further details on the proposed changes to the existing wattsmart Business program are included as Attachment B to this filing.

Enhanced offer for small business customers

In this filing the Company is also requesting modifications to the wattsmart Business program that will provide a targeted incentive offer to capture additional savings from the harder to reach small/medium business customer segment. The initial offer will be an enhanced retrofit lighting upgrade offering. There is high market potential for energy savings from lighting upgrades in the small/medium business customer segment as evidenced by:

- An analysis of past program participation which showed that 96% of small business customers (approximately 70,000 customers) have not participated in energy efficiency programs.

- The findings of the Company’s 2013 DSM Potential Study which shows the largest savings potential of all measure categories continues to be in commercial lighting —37% of the achievable technical potential across five of six states¹ served by the Company, and 38% in Utah specifically. (The Cadmus Group, Inc., 2013).²

The small business offer is designed to overcome participation barriers for small/medium business customers, as identified by the Center for Energy and Environment³:

- Lack of awareness of energy-efficiency opportunities and relative benefits in both customer-owned and leased facilities.
- Lack of time and resources to investigate and implement energy efficiency improvements
- Limited access to capital for energy efficiency projects

Overview of the small business offer

As proposed, the small business offer will align with a best-practice approach used by many other utilities (listed in Table 1, below) utilizing a pool of Company-approved and managed contractors to work directly with small/medium business customers to identify energy-efficiency upgrades, estimate savings and incentives, and install high-efficiency equipment. Participating customers utilizing an approved contractor will be eligible for an enhanced incentive offer targeted at 80% of the project cost. To reduce the customer’s out-of-pocket expenses and minimize cash flow impacts, the customer can assign the incentive to the contractor who will then apply it as an up-front reduction to the overall project cost. Participating contractors will complete and submit the required incentive application and documentation to the Company for payment of the incentive amount that was assigned to them by the customer.

Table 1 - Similar Offers from Other Utilities

Utility	Program Name	Customer Eligibility
 Pacific Gas and Electric Company [®]	Right Lights	Small and Mid-Sized Business
	Express Solutions	Demand ≤ 100 kW + schools
	Business Solutions Small Business Program	< 145,000 kWh/yr
 Black Hills Energy	Small Business Direct Install Lighting Program	≤ 350 kW

¹ Excludes Oregon.

² The Cadmus Group, Inc. (2013). *Assessment of Long-Term, System-Wide Potential for Demand-Side and Other Supplemental Resources, 2013-2032 Volume I*. PacifiCorp.

³ Center for Energy and Environment. (n.d.). *One-Stop Efficiency Shop 2000-2007*. Minneapolis: Center for Energy and Environment.

	Direct Install	Small and Mid-Sized Business
	Complete Energy Solutions	Up to 299 kW / mo
	Small Business Services program	≤300kW / month
	Small Business Energy Advantage	Avg peak demand 10 kW - 200 kW
	Small Business Energy Solutions	≤ 200 kW / month
	Smart Energy Savers	≤60 kW / mo
	Small Business Lighting	≤ 400 KW

In 2013, the Company revised its energy efficiency portfolio consolidating all non-residential programs into the wattsmart Business program. The small business offer is proposed to be added as a component of the existing wattsmart Business program. The existing wattsmart Business program design/infrastructure and trade ally/contractor administration team will be utilized, linking customers with the program options and contractor resources that most appropriately address their needs. Customers not eligible to receive the small business offer remain eligible to participate in all other elements of wattsmart Business including the program’s other lighting offers.

The Company has hired an administrator who will identify, solicit, and approve contractors to participate in the delivery of the small business offer using a competitive RFP process. Selection criteria will be based on business reputation, offered lighting retrofit costs, past participation in wattsmart Business, geographic area served, and capability to pursue projects. Preference will be given to existing local Utah contractor businesses operating successfully for the past 12 months. Approved contractors will be required to enter into an agreement with the Company indicating they will abide by the terms and conditions of this offer and will be provided with local sales, marketing, and program training. Contractor performance will be monitored closely to ensure high customer satisfaction, accurate project information, and cost-effective savings.

Table 2 – Small/Medium Business Barriers and Solutions

Barrier	Solution
Lack of awareness of energy-efficiency opportunities and relative benefits in both customer-owned and leased facilities.	Contractors identify upgrades and provide customers, owners, tenants with the output of a lighting tool summarizing the project economics with available incentives. Contractors explain energy and non-energy benefits.

<p>Lack of time and resources to investigate and implement energy efficiency improvements</p>	<p>Contractors approved by the Company-hired administrator review existing lighting and provide customers with a proposal for upgraded lighting.</p> <p>Contractors provide completed paperwork for customer signature.</p>
<p>Limited access to capital for energy efficiency projects</p>	<p>Incentives are targeted to cover 80% of the implementation costs, significantly reducing the initial customer out-of-pocket expenses. Customers are expected to recoup their total out-of-pocket investment in the form of electric bill savings in as little as one year.</p>

Customer Participation Process

The small business offer will be available to customers exclusively through approved contractors, according to the process outlined in

Figure 1 below. Outreach and sales efforts of the approved contractors will be the primary means by which customers will learn about the offer, but may be supplemented by Company-led marketing efforts.

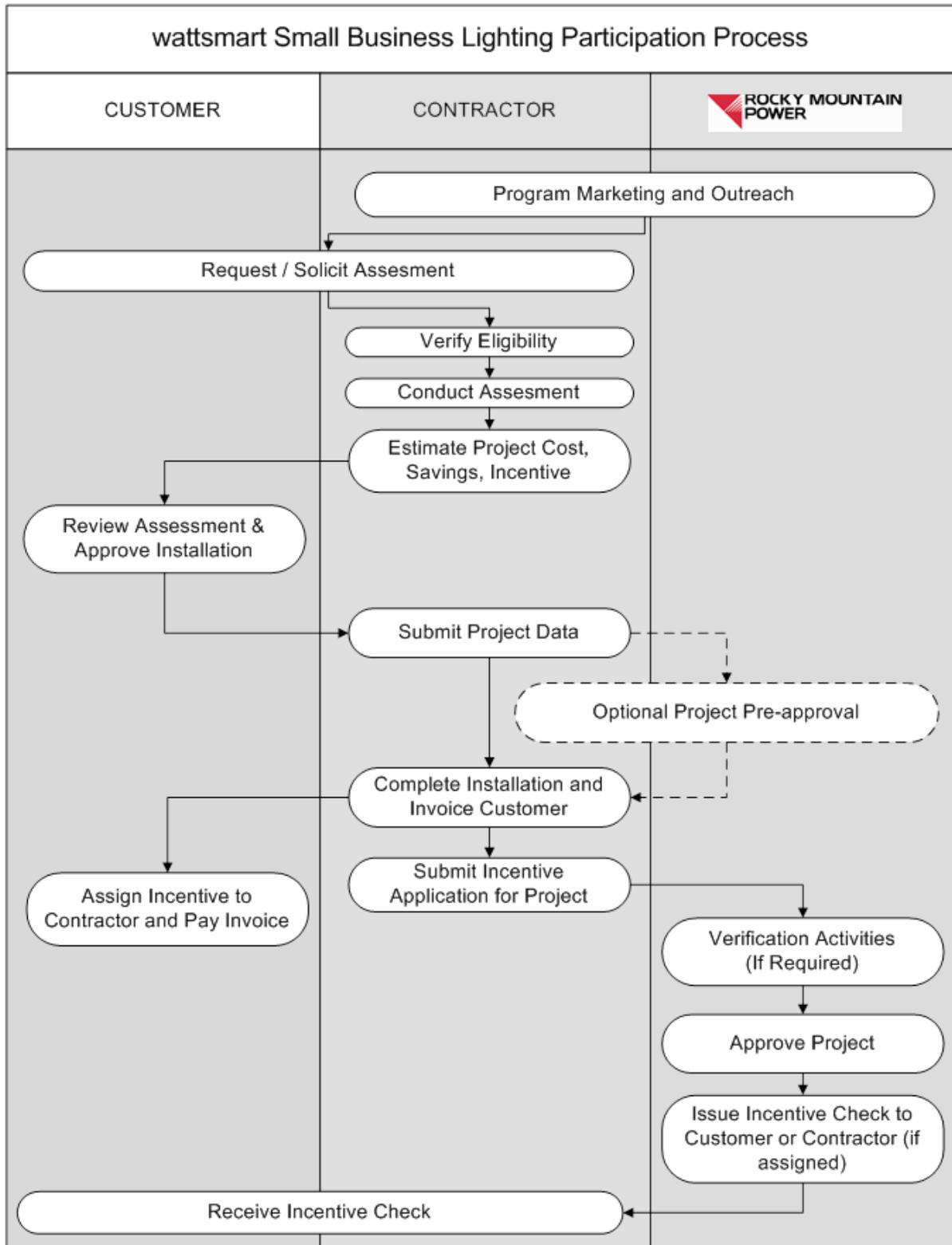
Once engaged, approved contractors will work with the customer to confirm eligibility, inventory existing equipment, recommend high-efficiency upgrades, estimate the overall project cost, identify energy/cost savings, and provide available incentive calculations. Incentives will cover up to 80% of the overall project cost and may be credited against the overall cost quote provided to the customer as part of the contractor bid.

The customer

- decides whether to proceed with the project,
- decides which participating vendor to work with,
- decides to assign the incentives to contractor (reflected as a credit on the contractor invoice to the customer) or to receive a cash incentive at project completion,
- schedules the installation date with the contractor, and
- pays the non-incentivized portion of the project cost directly to the contractor.

Upon completion and approval of the project, the incentive is paid according to the instructions in the customer's application (either paid directly to the contractor or paid to the customer).

Figure 1: Small Business Lighting Participation Process



Eligible Customers

To ensure the small business offer targets its intended audience, the company’s small/medium business customers, eligibility will be limited as follows:

- Rate Schedule 23 – all customers on this rate schedule will be eligible
- Rate Schedule 6, 6A, and 6B – customers on these rate schedules with annual usage less than 130,000 kWh at an individual meter will be eligible

Qualifying Measures

Initially, the measure list will be focused on high-efficacy fluorescent lighting technologies, occupancy controls, and LED recessed downlights and exit signs that are frequently found in small/medium businesses, as shown in Table 3. Measures not included in the small business customer incentive table will be incentivized at the standard rates currently offered in the wattsmart Business program.

Table 3 - Enhanced Incentives for Small Businesses

Measure	Category	Eligibility Requirements	Maximum Incentive ⁴
T8 Fluorescent	Retrofit (Lamp/Ballast)	4' CEE Qualified Reduced Wattage Lamp and CEE Qualified Ballast included on qualified ballast list	\$120/Fixture
	Delamp	4' CEE Qualified Reduced Wattage or High Performance Lamp and CEE Qualified Ballast. Must remove one or more lamps. To delamp an existing fixture, the lamp and all corresponding sockets must be permanently disabled.	\$120/Fixture
	T12 Conversion (Kit/Lamp/Ballast)	8' T12 to (2) 4' CEE Qualified Reduced Wattage or High Performance T8 Lamps and CEE Qualified Ballast.	\$130/Fixture
	Relamp	Lamp wattage reduction \geq 3 Watts, No ballast retrofit	\$15/Lamp Installed
	Replacement – High Bay (Fixture/Lamp/Ballast)	Replacement – High Bay (Fixture/Lamp/Ballast)	Fixture with less than six (6) lamps: 4' CEE Qualified High Performance Lamp. Must replace T12HO/VHO or HID
Fixture with six (6) or more lamps: 4' CEE Qualified High Performance Lamp. Must replace T12HO/VHO, incandescent or HID			\$330/Fixture
T5 Fluorescent	Replacement – T5 Standard (Fixture/Lamp/Ballast)	4' Nominal Lamp \leq 28 Watts, Ballast Factor \leq 1.0	\$230/Fixture
	Relamp	Lamp wattage reduction \geq 3 Watts, No ballast retrofit	\$22/Lamp Installed
	Replacement – High Bay (Fixture/Lamp/Ballast)	Replacement – High Bay (Fixture/Lamp/Ballast)	Fixture with less than six (6) lamps: Must replace T12HO/VHO, Incandescent or HID
Fixture with six (6) or more lamps: Must replace T12HO/VHO or HID			\$350/Fixture

⁴ Actual incentives, determined by Company on no less than an annual basis, will not exceed the values in this table and will be posted on the Company website.

LED	Replacement/Retrofit - Recessed Downlight (Fixture or Kit)	Must replace existing incandescent or fluorescent, LED must be listed on qualified equipment list	\$125/Fixture
	Replacement - Exit Signs	Must replace incandescent or fluorescent	\$75/Sign
Lighting Control	Wall Occupancy Sensor Retrofit	PIR, Dual Tech	\$80/Sensor
	Ceiling Occupancy Sensor Retrofit	PIR, Dual Tech	\$200/Sensor

The Company will continue to review other possible qualifying measures that are found cost effective either at a program or individual project level. The Company will bring those measures forward to the Commission and into the offering as they are identified.

Incentive Structure

The Company is proposing to define the incentives for this offer on a measure-specific basis to cover up to 80% of the customer cost. Incentives will initially be determined relative to competitively-bid market costs collected from the RFP application process used to select and approve contractors and will not exceed the maximum incentive values in Schedule 140. The incentive table will be posted on the Company’s website.

Incentives will be explicitly defined in the agreement made with each contractor. When the customer has opted to assign the incentive payment to the contractor, contractors will be required to pass-through the full incentive amounts as an up-front discount off the cost quote provided to participating customers through the assignment of the incentives to the contractors by the customers.

Upon completion and approval of a project, the incentive will be paid by the Company directly to the contractor who was assigned the incentive or to the customer if the incentive was not assigned to the contractor. This approach significantly reduces the customer’s out-of-pocket expenses, as detailed in the example project below.

Figure 2 – Example Project

Project Specifics are from a past wattsmart Business retrofit project: <ul style="list-style-type: none"> ▪ Utah schedule 23 customer in Layton, Utah <ul style="list-style-type: none"> ▫ Energy Cost = \$0.0607 /kWh ▫ Demand Cost = \$8.372 /kW ▪ (124) 2-Lamp, 4’ Premium T8 fixtures installed with (22) occupancy controls 	Total Project Cost	\$10,478
	Energy Savings (kWh/yr)	24,610
	Demand Savings (kW/month)	8.5
	Electric Cost Savings	\$2,343
	Enhanced Incentive (80%)	- \$8,382
	Net Customer Out-of-Pocket Cost	\$2,096
	Simple Payback (Pre-Incentive)	4.5 yrs
	Simple Payback (Post-Incentive)	0.9 yrs

The example shows the customer’s out-of-pocket expenses reduced from \$10,478 to \$2,096 with the simple payback going from 4.5 to 0.9 years after incentives. Compare this to the same project receiving the typical wattsmart Business incentives where the customer’s out-of-pocket expenses are \$5,239 with a simple payback of 2.2 years after incentives.

On a measure basis, incentives may not exceed the incentive amounts listed in Schedule 140 without Commission approval. Additionally, total project incentives will not exceed 80% of the final project cost so that customers maintain a financial commitment in project implementation.

Tariff structure for small business incentives

The proposed Schedule 140 tariff will include the above Table 3 listing the qualifying measures and not-to-exceed incentives for each measure. Although participants have the option to receive their incentive payment directly, the Company anticipates most will assign their incentive payment to the lighting contractor. The Company will have an agreement with lighting contractors that includes pricing levels. Contractors will be required to propose pricing that is consistent⁵ with their agreement with the Company. As such, the Company sees this as an upstream offer, similar to the not-to-exceed incentive for LEDs offered upstream in the Home Energy Savings program.

As with other upstream offers and given the incentive level at up to 80% of measure costs, it is important to have the capability to adjust incentive levels in response to changing market conditions. It is the Company's intent to make adjustments to the incentive table periodically to address market conditions for lighting (changes in material costs, product availability, and price competition), ensure the customer out-of-pocket expenses are approximately 20% of the overall project cost, and align with savings targets, incentive budgets, and cost effectiveness requirements.

When the Company needs to adjust the small business incentives, the Company will post a notice on its website announcing the coming changes. The notice will be posted at least 45 days prior to the changes taking effect. In no event will incentives exceed the not-to-exceed amounts listed in Schedule 140 without Commission approval.

Quality Assurance and Controls

A robust quality assurance regime is planned for the small business offer, focused on the following:

Contractors – A competitive RFP process administered no less than annually will be used to select the most qualified contractors to deliver the small business offer to customers. Each selected contractor will be required to sign an agreement with the Company outlining quality, customer service, and participation requirements. Contractor performance will be regularly monitored by the Company-hired administrator through project application review, customer satisfaction surveys, on-site inspections, office visits, and ongoing communications. Contractors not meeting or exceeding quality, customer service, project, invoicing, and other requirements will be subject to removal from participation in the small business offer.

Project Review – Contractors will be conducting a site-specific assessment and calculating incentives using the Company-provided standard calculation workbook. Each project application

⁵ Note contractors will have the flexibility to account for site specific variations in their proposed pricing to customers (e.g. include costs for rental of a lift for high ceiling applications, after hours installation, etc.)

will be examined to validate customer eligibility, review submitted costs, and confirm adherence to program policies and procedures before issuing an incentive check. Contractors are expected to provide customer pricing consistent with costs submitted during the RFP process. Project costs will be closely monitored and deviations from the RFP costs will be investigated.

Installation Verification - On-site inspections and customer phone calls will be performed on a sample of completed projects to confirm contractor-submitted charges, verify installation quality and reported accuracy, and solicit customer feedback of the participation process.

Projected Costs and Energy Savings

The Company has set a first-year savings goal of 1.5 million kWh⁶. Through an analysis of the eligible customer base and the savings potential from the qualifying measures, a reasonable average savings of 5,000 - 6,500 kWh is expected per project coming from 250 - 325 completed projects.

Projected costs and savings are provided in the cost effectiveness analysis.

Cost-Effectiveness

A consolidated approach was taken to the cost effectiveness analysis. Step one was to establish a three year base case of the existing program without any changes or additions; business-as-usual case. The business-as-usual case was set to align with the Utah 2014 savings forecast provided on November 1, 2013. Values for net-to-gross, realization rates and measure life used to assess the business-as-usual case were based on values from the 2012 Utah annual report.

The business-as-usual case program level cost effectiveness utilized East System load shape decrement values as the avoided costs. The stream of costs utilized in this analysis can be found on pages 358-359 of Volume 2 of the 2013 IRP dated April 30, 2013. Once the performance of the business-as-usual case was assessed, ten “measures” representing the three year impact of the changes with quantifiable impacts were modeled at the “measure” level using the same load shape and avoided costs. The ten measures are:

- Food Service
- HVAC
- Adaptive Refrigeration control
- Compressed Air
- End Use Compressed air reduction
- Fast Action Door
- Irrigation
- Oil & gas pump off controller
- Waste water mixing
- Small business offer

⁶ Gross savings at the customer site (does not include a net-to-gross adjustment or line loss adjustment).

Inputs for measure costs, measure life, realization rates, and net-to-gross ratio were specific to the measures and are provided in Tables 1 – 4 of Attachment C: *Cost Effectiveness: Utah Three-Year Business Plan Cost Effectiveness* dated April 9, 2014.

Measure (project) costs used to assess the cost effectiveness small business offer are based on documented cost information (invoices) for small lighting projects completed over several years. Project costs competitively bid through an RFP process (described above in *Incentive Structure*) are expected to be generally consistent with these historical values. The Company is cognizant that material variations in actual vs. forecast project costs could alter cost effectiveness results. The Company will manage the contractor selection process to align the proposed small business offer incentive levels used in the cost effectiveness analysis provided here.

All ten additional measures are cost effective from the utility cost perspective. Three of the ten measures are not cost effective from the total resource perspective. Measure level results are available in Attachment C: *Cost Effectiveness*.

Benefits and costs for the ten measures were added to the business-as-usual case to assess the impacts of adding the measures to the existing program. Results of the cost effectiveness analysis for the enhanced program are provided in Table 4 below.

Table 4 – Cost effectiveness analysis for the enhanced program

Cost-Effectiveness Test	Levelized \$/kWh	Costs	Benefits	Net Benefits	Benefit/Cost Ratio
Total Resource Cost Test (PTRC) + Conservation Adder	\$0.046	\$100,048,734	\$179,050,972	\$79,002,237	1.79
Total Resource Cost Test (TRC) No Adder	\$0.046	\$100,048,734	\$162,773,611	\$62,724,876	1.63
Utility Cost Test (UCT)	\$0.025	\$55,115,999	\$162,773,611	\$107,657,612	2.95
Rate Impact Test (RIM)		\$213,897,480	\$162,773,611	(\$51,123,869)	0.76
Participant Cost Test (PCT)		\$102,833,008	\$230,598,352	\$127,765,344	2.24
Discounted Participant Payback (years)				4.41	

Cost effectiveness sensitivity analysis

Sensitivity analysis was performed on one of the proposed measures and the enhanced program. Sensitivity to carbon prices was not performed since the 2013 IRP only contains a single series of values. This is different than the 2011 IRP which contained multiple series of values, each with a different carbon price assumption.

The Company selected the small business offer for measure level sensitivity analysis since savings and project costs will be site specific and are expected to vary over a wider range than

the other added measures. The wider range is driven primarily by operating hours and the relative project complexity of the range of facilities that are eligible to participate. Sensitivity to low and high energy savings (as might be encountered in a facility with lower (or higher) operating hours) and low and high project costs (as might be encountered in easy (or hard) installation) was tested. The results are provided on Tables 15-19 in Attachment C: *Cost Effectiveness*. Two cases pass all tests except RIM. Two cases (low savings and high costs) don't pass UCT, however these cases are built on an assumption that all (not some) projects skew in the same direction for the entire three year period. While this outcome is possible it is a very remote probability. To further assess the impact of changes of the small business offer performance on the overall portfolio, all four small business offer sensitivity cases were added one at a time with the business-as-usual cases to see if any of them materially affected the overall portfolio results. Of particular interest were the two cases that didn't pass the UCT (low savings and high costs). When these cases are combined with the business-as-usual case neither one materially changed the results of any of the five tests, and the resulting combination(s) remain cost effective from the PTRC, TRC, UCT perspectives. Results are provided on Tables 9-12 in Attachment C: *Cost Effectiveness*.

Finally, the enhanced program (business-as-usual plus all the proposed additional measures) went through two sensitivity analyses to test the effects of variances in participation. The first case assumes energy savings are lower by ten percent, but all other costs remain the same. The second case assumes the savings increases while all other costs remain the same. The results of both sensitivity analyses are provided in Tables 6 and 7 in *Attachment C: Cost Effectiveness*. The proposed program is forecasted to be cost effective under both of these sensitivity scenarios.

Stakeholder Involvement

A preview of upcoming changes to the wattsmart Business program was presented at the December 10, 2013 meeting of the Utah DSM Advisory Group. On March 31, 2014, the draft filing was circulated to the Advisory Group, with a follow-up call on April 10, 2014 to collect comments and feedback. The Company captured changes in 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

By Regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Blvd., Suite 2000
Portland, OR 97232

Utah Public Service Commission
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Informal inquiries may be directed to Lisa Romney, DSM Regulatory Projects Manager, at (801) 220-4425.

Sincerely,

Kathryn Hymas
Vice President, Finance and Demand Side Management

Enclosures

Cc: DPU
OCS