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State of Utah  
DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
Director

To: Public Service Commission

From: Office of Consumer Services  
Michele Beck, Director  
Gavin Mangelson, Utility Analyst

Date: July 8, 2014

Subject: Docket 14-035-T07

**In the Matter of:** Rocky Mountain Power's Proposed Revisions to Electric Service Schedule No. 118, Low Income Weatherization

### **Background**

On June 23, 2014 Rocky Mountain Power Company (Company) filed with the Public Service Commission (Commission) proposed revisions to Schedule No. 118, Low Income Weatherization. The Commission subsequently issued a Notice of Filing and Comment Period.

In preparation for this filing the Company had previously submitted preliminary proposals to the Demand-Side Management (DSM) Steering Committee. Feedback was provided to the Company in advance of the filing.

### **Discussion**

The Office of Consumer Services (Office) participates in the DSM Steering Committee; the Office offered suggestions to the Company regarding the preliminary proposals. The Company has incorporated some of the Office's suggestions into this filing.

During the preliminary correspondence with the Company the Office questioned the removal on tariff sheet 118.5 of (3) Installation shall meet Federal, State and Local building codes. The Company responded that the contract with Utah Housing and Community Development (HCD) already includes language that requires the Program be executed in conformance with applicable Federal, State and Local building codes.

The Office recognizes the importance of this language in the Company's contracts but asserts that inclusion of some statement regarding this requirement should remain part of the tariff. As contract language is not filed with the Commission and made publicly available, this portion of the tariff is helpful for those reviewing the program without access to the contract. The Office suggests that the Company could include in the tariff a statement that declares "As per the terms of contract (RMP & HCD) installations are required to meet Federal, State, and Local building codes."

### **Recommendations**

The Office recommends that the Commission deny removal of tariff language explaining the requirement that installations meet Federal, State and Local building codes unless the language is replaced by language of equivalent meaning and approve the remaining changes to the tariff.

Copies To: Rocky Mountain Power  
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Division of Public Utilities  
Chris Parker, Director  
Artie Powell, Energy Section Manager