



Salt Lake City, Utah 84111

201 South Main, Suite 2300

July 15, 2014

***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: Reply Comments Advice No. 14-06, Docket No. 14-035-T07  
Tariff Schedule 118 – Low Income Weatherization

On June 24, 2014 the Public Service Commission (“Commission”) issued a notice of filing and comment period in the Matter of Rocky Mountain Power’s Proposed Revisions to Electric Service Schedule No. 118, Low Income Weatherization. Rocky Mountain Power (“Company”) would like to provide reply comments to address the comments received by the Commission from the Office of Consumer Services (“Office”).

In the comments dated July 8, 2014 from the Office of Consumer Services, they provide the following recommendation, “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.”

In preparation for this filing the Company submitted to the Demand-Side Management (DSM) Steering Committee a draft of the proposed changes. As part of the review, the Office questioned the removal on tariff sheet 118.5 of the language, “Installation shall meet Federal, State and Local building codes”. The Company responded that the proposal to eliminate that item from the tariff was because the Company does not have direct oversight over that compliance requirement. The requirement is fulfilled by the Housing and Community Development Division (HCD) through the Company’s contract with them. The contract between the Company and HCD includes the following sentence, “The Agency will cause the Program to be executed in conformance with all applicable federal, state and local building codes, and in conformance with applicable industry standards of care, skill and diligence.”

The Company recognizes the Office’s concern that contract language is not filed with the Commission and made publicly available. Due to this the Company suggests that instead of deleting the tariff language the proposed tariff wording could be revised to the following, “HCD

Public Service Commission of Utah

July 15, 2014

Page 2

will ensure installation meets Federal, State and Local building codes.” The Company has included an updated tariff sheet 118.5 which includes the proposed language.

An original and five copies are provided of the Company’s reply.

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

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

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

Informal inquiries may be directed to Dave Taylor, Manager of Regulatory Affairs, at (801) 220-2923.

Sincerely,

Kathryn Hymas  
Vice President, Finance and Demand Side Management

Cc: Division of Public Utilities  
Office of Consumer Services

Enclosure