



PublicService Commission <psc@utah.gov>

Rocky Mountain Power Grievance

1 message

Utility Complaints <utilcomp@utah.gov>

Tue, Jul 15, 2014 at 2:38 PM

To: mark@mountainlighting.com

Cc: PublicService Commission <psc@utah.gov>

Dear Mark E. Miller / Mountain Lighting,

You have completed an Informal Complaint form online with the Division of Public Utilities. However, the scope of the Informal Complaint process through the Division of Public Utilities is to enforce uniform residential utility service practices and procedures governing eligibility, deposits, account billing, termination, and deferred payment agreements.

Because your complaint pertains to a topic currently being evaluated by the Public Service Commission under an open docket, I can forward your comments to the Commission to be submitted under this docket, and suggest that you monitor any upcoming proceedings at www.psc.utah.gov.

Respectfully,

Erika Tedder

[801-530-6653](tel:801-530-6653)

The Division of Public Utilities

Business hours are 8:00 a.m. - 5:00 p.m., Monday-Friday

UTILITY CUSTOMER:

FROM: Mountain Lighting

CONTACT: Mountain Lighting

PHONE: [435-586-5502](tel:435-586-5502)OTHER PHONE: [435-327-1020](tel:435-327-1020)EMAIL: mark@mountainlighting.com

IP: 184.167.146.52

SERVICE ADDRESS:

390 S Main Street

Cedar city, UT 84720

MAILING ADDRESS:

390 S Main Street

Cedar city, Ut 84720

UTILITY: Rocky Mountain Power

ACCOUNT NUMBER: 577931340043

COMPLAINT TYPE: Rate And Tariff

COMPLAINT: To Whom it may concern,

I write you this day as a formal complaint regarding

Advice No. 14-07 Proposed Changes to Schedule 111.

DOCKET NO. 14-035-T08

My complaint specifically pertains to the method to incentive LED lighting fixtures for homeowners. Under the

current program, RMP residential customers can claim a \$20.00 "downstream" rebate incentive for their qualifying LED lighting fixtures. This incentive has allowed smaller distributors, like me, to compete successfully because an even handed incentive is available to all who participate in the program. As it now sits, the playing field is very evenly balanced for all distributing parties.

Under the proposed changes all "downstream" incentives would go away, and the creation of an "upstream" incentive for selected retailers/or manufacturers will become available. I think that this new proposal could be unfairly implemented.

Here is part of the proposal as written:

"To better manage incentive budgets and to leverage incentive dollars further the Program proposes removing the \$20 downstream customer incentives for ENERGY STAR light fixtures and replacing it with an upstream incentive to retailers and/or manufacturers. The Program proposes an "up to" \$10 incentive for fixtures to align incentives with market costs to improve Program cost-effectiveness. The upstream buy down for light fixtures will be operated the same as the upstream buy down for light bulbs. As with the current upstream buy down for light bulbs, the "up to" or maximum incentive gives the Program the flexibility to negotiate with retailers and manufacturers for lower incentives."

This change to an "upstream buy down" could effectively render smaller distributors like myself unable to compete in the LED fixture incentive programs by cutting us out of the equation. These changes will potentially give upstream retailers and /or manufacturers a \$10.00 per unit advantage over us on individual qualifying products if we are not permitted to participate in the "upstream buy down".

Our company and many others like us will be put on an unfair playing field if box stores are given an upstream incentive without regard to smaller electrical/ lighting distributors.

Our company has heavily promoted and eagerly participated in the "downstream" LED incentives offered to homeowners through the RMP's Home Energy Savings Programs and has been very effective in promoting LED and other energy saving products.

The proposed changes that are docketed to take place on July 25, 2014 could potentially give preference or even favoritism within the program without regard to smaller companies who have eagerly promoted the Home Energy Savings Program. In fact, it is a figurative slap in the face if smaller retailers become disregarded under the proposed changes.

There are many of us in the electrical/ lighting industry that can currently and confidently compete under the current terms of the HESP incentive plan.

Please consider amending the proposed changes to the Home Energy Saving Program to include a provision that addresses the need for this program to allow all retailers to participate for the equal benefit of all retailers and distributors of qualifying lighting fixtures.

Please contact me if you have any questions,

Respectfully submitted,

Mark E. Miller

Mountain Lighting
President
390 S. Main St.
Cedar City, UT 84720
Mobile Phone: [435-327-1020](tel:435-327-1020)

SUGGESTED RESOLUTION: Allow all retailers of qualifying products to participate in the program.

