

August 15, 2014

UTAH PUBLIC SERVICE COMMISSION
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

Re: Docket No. 14-035-T08, Rocky Mountain Power's Proposed Revisions to Electric Service Schedule No. 111, Home Energy Savings Plan

Dear Public Service Commission,

On July 9, 2014 Rocky Mountain Power (“Company”) submitted to the Public Service Commission (“Commission”) proposed changes to the Home Energy Savings Incentive Program (“Program”) administered through Schedule No. 111, including shifting an LED fixtures incentive from a downstream incentive to an upstream incentive. In response to the concerns of numerous commenters opposing this shift, on August 13, the Company modified its proposed changes to keep the downstream customer incentive for lighting fixtures. The Company proposed to reduce the downstream incentive from \$20 to \$10 and to cap the incentive at 50% of fixture cost.

Utah Clean Energy and SWEEP generally support the Company’s proposed changes, which increase the forecasted electricity savings from this program by close to 50% compared to the November 2013 filing. Below are Utah Clean Energy and SWEEP’s comments on specific components of the Home Energy Savings Incentive Program.

Mail-by Request: we strongly encourage RMP to investigate how to share the cost of natural gas household participation in this program with Questar.

Evaporative Cooling: we support increasing the incentive for portable evaporative coolers as well as for new and replacement standard evaporative coolers.

Lighting: we support RMP’s pending revised proposal to retain the downstream LED incentive, as per its revised August 13th filing. We recommend closely tracking changes to the uptake of LED fixtures. If slowdown occurs, we recommend bringing the incentive back up to maintain the current high level of uptake of LEDs. We recommend increasing the incentive for more complex and expensive LED fixtures to a level greater than \$10. We support increasing the incentive for general purpose and specialty LEDs from a maximum of \$14 to up to \$23.

Finally, we request that RMP file the customer survey referenced on the Steering Committee call with the Commission as an addendum to its August 13 filing.

Sincerely,

/s/ Kevin Emerson
Kevin Emerson
UTAH CLEAN ENERGY



We Partner to Build the New Clean Energy Economy

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 7th day of July, 2014 on the following:

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/s/ Sophie Hayes