



State of Utah  
Department of Commerce  
Division of Public Utilities

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## ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Energy Section Manager

Brenda Salter, Technical Consultant

Date: March 3, 2015

Re: **RMP Advice No. 15-02, Proposed changes to Schedules 111 and 140 – Home Energy Savings Incentive Program and Non-Residential Energy Efficiency Program respectively**

Docket No. 15-035-T02

## RECOMMENDATION

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) approve Rocky Mountain Power's (Company) proposed clarifying changes to the Home Energy Savings Incentive Program (HES) and the Non-Residential Energy Efficiency Program (NREE).

## ISSUE

On February 17, 2015, the Company filed proposed changes to both Utah Tariff Schedules 111 – HES and 140 - NREE with a requested effective date of March 18, 2015. On February 17, 2015, the Commission issued an Action Request for the Division to investigate the proposed changes to the HES and HREE programs and report its findings and recommendation to the Commission by

March 4, 2015. On February 19, 2015 the Commission issued a Notice of Filing and Comment Period allowing interested parties to make comments on the proposed changes on or before March 4, 2015 with reply comments due March 11, 2015. The Division provides these comments in response to the Commission's Action Request.

## **DISCUSSION**

The purpose of this filing is to provide clarifying language for both the HES and the NREE DSM Programs. The HES tariff contains language that should have been changed in the previous Schedule 111 filing but was missed. Schedule 111 page 111.2 Article 5 references the old 90 day incentive application grace period which has since been updated to 180 days as shown in Article 7.

The intended purpose of the 90 day reference in Article 5 was to make it clear that the customer had 90 days to submit the incentive application and receive the incentive that was in effect when the purchase was made. The Division was made aware of some confusion in how Article 5 was worded. The language could be interpreted to give the customer an additional grace period, therefore doubling the amount of time to file the incentive application. To help eliminate confusion with Schedule 111, the Division and the Company felt that removing the reference to the grace period in Article 5 was the best course of action.

The addition of a footnote in the non-residential energy efficiency tariff makes it clearer that project caps and a one-year simple payback apply to new construction and major renovation projects that are not subject to state energy code. Without this language customers may interpret the schedule to allow more than 100% of the of their incremental project costs or below a one-year payback.

A draft of the proposed changes was submitted to the Steering Committee on February 9, 2015, for review prior to filing.

## **CONCLUSION**

The Division has reviewed the changes as proposed by the Company and recommends that the Commission approve the modifications to Electric Service Schedules 111 and 140.

CC Kathryn Hymas, Rocky Mountain Power  
Bob Lively, Rocky Mountain Power  
Michele Beck, Office of Consumer Services  
Service List