

June 1, 2015

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

**RE: Docket No. 15-035-T07 – In the Matter of Rocky Mountain Power’s Proposed Revisions to Electric Service Schedule No. 110, New Homes Program**

Dear Public Service Commission,

On May 15, 2015 Rocky Mountain Power filed its proposed revisions to Electric Service Schedule No. 110, New Homes Program, and on the same date the Commission issued a Notice of Filing and Comment Period asking interested parties to submit comments on Rocky Mountain Power’s proposed revisions on or before June 1, 2015. Utah Clean Energy is hereby submitting these comments in support of the changes proposed by Rocky Mountain Power to the New Homes Program.

Utah Clean Energy supports Rocky Mountain Power’s proposal to add new qualifying measures under the New Homes Program, including the following:

- a) electrically commutated motor for 95% efficient gas furnace
- b) air source heat pump
- c) 60% of lighting fixtures contain ENERGY STAR qualified lighting products

Utah Clean Energy supports Rocky Mountain Power’s proposed changes to the ENERGY STAR lighting measure under the New Homes Program. We believe that the addition of a new, lower tier incentives for new homes where 60% of lighting contains ENERGY STAR qualified lighting products, will drive the builders towards installing a greater number of energy efficient lights in new residential buildings. We also support the retention of the 80% lighting tier with a higher incentive. We also encourage the Commission to investigate other lighting incentive models targeting the new home construction market, such as a mid-market incentives to lighting dealers and distributors that serve the building contractor market.

While incentives for central ACs and evaporative coolers already exist, we believe that introducing incentives for Air Source Heat Pumps will help move HVAC contractors towards



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installing more efficient (15+SEER) air source heat pumps in new residential construction. We understand that the electricity savings from the proposed program changes are mainly a result of replacing low efficiency ACs or heat pumps with an air source heat pump having a 15+SEER rating. We support Rocky Mountain Power's proposal of offering different levels of incentives where natural gas is available at the property line, as this will help provide higher savings for homes that rely on electricity for both heating and cooling purposes.

Sincerely,

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Mitalee Gupta  
Program and Policy Associate  
UTAH CLEAN ENERGY



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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 1<sup>st</sup> day of June, 2015 on the following:

### ROCKY MOUNTAIN POWER:

Robert C. Lively	bob.lively@pacificorp.com
Michael S. Snow	michael.snow@pacificorp.com
Daniel. E. Solander	daniel.solander@pacificorp.com

### DIVISION OF PUBLIC UTILITIES:

Patricia Schmid	pschmid@utah.gov
Justin Jetter	jjetter@utah.gov
Chris Parker	chrisparker@utah.gov
William Powell	wpowell@utah.gov
Dennis Miller	dennismiller@utah.gov

### OFFICE OF CONSUMER SERVICES:

Michele Beck	mbeck@utah.gov
Cheryl Murray	cmurray@utah.gov

/s/ Sophie Hayes