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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: Public Service Commission

From: Office of Consumer Services
Michele Beck, Director
Gavin Mangelson, Utility Analyst

Date: June 15, 2015

Subject: **Reply Comments** for Docket 15-035-T07

In the Matter of: Rocky Mountain Power's Proposed Revisions to Electric Service Schedule 140, Non-Residential Energy Efficiency

On May 22, 2015 Rocky Mountain Power Company (Company) filed with the Public Service Commission (Commission) a proposal to suspend provisions of Schedule 140, Non-Residential Energy Efficiency. The Commission subsequently posted a Notice of Filing and Comment Period on May 27, 2015.

On May 19, 2015 Office of Consumer Services (Office) participated in a meeting with members of the Demand-Side Management (DSM) Steering Committee to discuss the reasoning for the proposed suspension.

Comments in this docket were filed on June 8, 2015 by the Division of Public Utilities (Division) and Utah Clean Energy (UCE). The Division supports the proposed suspension and agrees that the Company needs time to reevaluate the program. The Division also agrees that the suspension is appropriate regarding constraints to the 2015 Budget.

UCE also supports the requested suspension noting the complications caused by the budget overrun and that the program is in need of some design changes. However, UCE would prefer to see the program continue without suspension given the high levels of participation and the resulting potential energy savings.

UCE requests that this program be re-initiated as quickly as possible, no later than January or February of 2016. UCE further requests that a follow-up meeting be held

with the DSM Steering Committee in order to discuss the status of the program and its redesign.

The Office agrees with the Company and Comments filed by the aforementioned parties in the conclusion that elements of the Non-Residential Energy Efficiency Program should be suspended. The Office further agrees with UCE that this program should be reinstated as soon as is practicable. Although we understand that January or February of 2016 may not be possible, we request that the Company provide a more specific goal than the broad statement that the program will be reinstated sometime in 2016. The Office is concerned that an extended suspension may lead to confusion in the market and reduced effectiveness of the program when reinstated. The Company should make the redesign of this program a priority, and therefore attentions of Company staff should be focused on the redesign of this program rather than on proposing any new programs or measures in the coming months. The Office also joins UCE in asking for regular detailed updates as to the programs redesign and dates of anticipated reinstatement.

Copies To: Rocky Mountain Power
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