THE CHURCH OF
JESUS CHRIST
OF LATTER-DAY SAINTS

HEADQUARTERS FACILITIES DEPARTMENT
50 East North Temple Street
Salt Lake City, Utah 84150-0025

February 22, 2019

ROCKY MOUNTAIN POWER'S PROPOSED TARIFF REVISIONS TO ELECTRIC SERVICE SCHEDULE NO. 140, NON-RESIDENTIAL ENERGY EFFICIENCY

Electric Service Schedule No. 193 lists the Demand Side Management (DSM) utility charges that fund the actions of Electric Service Schedule No. 140. These DSM charges are equally applied to the utility usage of customers regardless of the electrical consumption within each respective schedule. For example, a schedule six customer that consumes 2,400 kWh per month receives the same 3.60% DSM utility charge as that of a schedule six customer that consumes 22,800 or 69,800 kWh per month. The proposed changes filed on February 8th, 2019 will allow Rocky Mountain Power to adjust the customer benefit by dividing utility users into size segments delineated as 'Small', 'Medium', and 'Large'. A customer is classified into one of these segments depending on how much average monthly energy is used throughout the year. This means that a schedule six customer that is classified as 'Small' will have higher lighting incentives than a 'Large' customer even though both are paying the same 3.60% DSM utility charge. Thus, the proposed filing disproportionally places an increased financial burden on 'Medium' and 'Large' customers because of a decreased opportunity to recover the DSM charge.

According to the Rocky Mountain Power Tariff, filed on February 8th, 2019, 'Medium' and 'Large' customer segments represent 3,550 of the largest utility users that Rocky Mountain Power serves. Note, that if the proposed lighting incentives are approved, this same disproportionality has the potential to exist among all commercial rates listed in Electric Service Schedule No. 193.

It is recommended that the lighting 'Segment Incentives' proposed in the filing not be approved because of the disproportionate financial burden it places on 'Medium' and 'Large' customers within each Electric Service Schedule. Rather, it is recommended that Rocky Mountain Power avoid creating customer segments within the utility incentive programs and that incentives be kept equal among all customer utility usage profiles.

Respectfully,

Charles N. Andersen, Managing Director
Headquarters Facilities Department