



State of Utah

Department of Commerce Division of Public Utilities

FRANCINE GIANI CHRIS PARKER
Executive Director Director, Division of Public Utilities

GARY HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Action Request Response

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Brenda Salter, Utility Technical Consultant

Date: March 7, 2019

Re: **Proposed Changes to Schedule 140, Non-Residential Energy Efficiency Program, Docket No. 19-035-T01**

Recommendation (Approval)

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) approve Rocky Mountain Power's (RMP or Company) proposed changes to the Non-Residential Energy Efficiency Program.

Issue

On February 8, 2019, the Company filed modified tariff pages to Utah Tariff Schedule No. 140 Non-Residential Energy Efficiency Program requesting several measure changes to the tariff along with other clean-up changes. On February 25, 2019, the Division responded to the Commission's Action Request dated February 8, 2019. Subsequently, the Commission issued a second Action Request dated March 5, 2019, requesting "analysis and support that cost-effectiveness of the portfolio, large customer participation, and large customer average incentives will remain at basically the same levels." This memorandum represents the Division's response to the Commission's second Action Request.

Discussion

As with all Rocky Mountain Power energy efficiency program changes, Company filings are based on anticipated outcomes of customer participation. Anticipated customer participation would then drive the forecast for the cost-effectiveness and incentive levels. The Division's February 25, 2019, memo reviewing the proposed changes to Schedule No. 140 included a sentence that made it appear that additional analysis, not provided with the memo, was completed. The Division erred in saying the Company's 'analysis shows' large customers would have little to no change. Instead, the Division's response should have said that the proposed program changes, based on anticipated large customer participation is expected to remain at the same levels. The Division's review included what was provided by the Company in the filing and was based on the anticipated outcomes of customer participation. No additional analysis was performed.

Conclusion

The Division continues to believe that the proposed changes are cost-effective and consistent with the Commission's goals to promote cost-effective DSM programs that are just and reasonable and in the public interest. Therefore, the Division recommends the Commission approve the Company's proposed modifications to Electric Service Schedule No. 140.

Cc: Michael Snow, Rocky Mountain Power
Jana Saba, Rocky Mountain Power
Michele Beck, Office of Consumer Services
Service List