

April 9, 2019

**VIA ELECTRONIC FILING**

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, Utah 84111

Re: **Docket No. 19-035-T01—In the Matter of Rocky Mountain Power’s Proposed Tariff Revisions to Electric Service Schedule No. 140, Non-Residential Energy Efficiency**

Utah Clean Energy (“UCE”) and Southwest Energy Efficiency Project (“SWEET”) are submitting these comments in response to Rocky Mountain Power’s (“RMP”) proposed revisions to the Non-Residential Energy Efficiency program filed on February 8, 2019. Our comments will primarily focus on the proposed changes to the lighting system retrofit incentives, specifically, the process governing customer segmentation under RMP’s proposed revisions.

RMP proposed the following process for segmenting customers:

It is proposed to segment customers by size: small, medium, and large. Customer size will be determined by aggregating customer data for each meter within each customer account, including the average total account kWh usage and the highest single meter demand (kW) across the previous 12 months. Using both kWh usage and kW demand most appropriately identifies customer usage and size characteristics. An account with multiple buildings/meters is considered as one customer, with all meter usage data included in that account calculation. Once this data is aggregated, each customer account will then be assigned to the appropriate small, medium or large segment.<sup>1</sup>

UCE and SWEET are concerned with the ubiquitous aggregation of multiple buildings/meters under one RMP account for purposes of identifying customer energy usage and size characteristics. It is possible for a customer to have multiple buildings that are largely independent or different from one another, such as convenience stores, to the extent that the

---

<sup>1</sup> Rocky Mountain Power, Corrected Tariff filed on February 8, 2019, page 4, found at <https://pscdocs.utah.gov/electric/19docs/19035T01/306611CorrTariff2-8-2019.pdf>.

buildings should be considered separate from an energy use standpoint. While for billing purposes, it makes sense to aggregate each building's meter to facilitate efficient payment.

UCE and SWEEP understand that if the Public Service Commission approves RMP's revisions, RMP will monitor the customer segmentation process, as it would with any new process, to determine whether customers are being categorized appropriately, or whether the new process is producing unreasonable results.

Additionally, during the technical conference held on March 26, 2019, RMP said that customers will have the ability to manage their RMP accounts to manually subdivide meters into separate accounts if they wished to do so. However, for many large customers, manually separating meters would likely be costly, complicated, and pose an undue burden on the customer given the potential number of meters. Therefore, UCE and SWEEP request that RMP provide an update to the Steering Committee on the following: 1) how the new customer segmentation process is working, including segmentation results such as participation rates by size class; 2) how many customer complaints RMP receives after customers have been segmented; and 3) the nature of those complaints, if any. This information will help the Steering Committee determine whether pursuing an alternate method of segmenting customers is in the public interest.

To be clear, UCE and SWEEP support RMP's proposed revisions to Schedule 140. Based on the information and analysis that RMP provided in the revised filing and during the technical conference, non-residential customers of all sizes are likely to benefit from the lighting system retrofit program revisions. The proposed process is also likely to increase the number of customers who participate in the program. Further, by encouraging customers to make cost-

effective investments in advanced control/network lighting measures, RMP is not only maximizing the efficiency gleaned from the program but it is also enabling additional benefits such as the potential for new demand response offerings. UCE and SWEEP support the proposed revisions to Schedule 140 for these reasons. However, because this is a new process that has not yet been tested, we recommend the above reporting to the DSM Steering Committee as soon as is practicable and on an ongoing basis, if the Commission grants the proposed Schedule 140 revisions.

Thank you for the opportunity to provide comments.

Sincerely,

/s/ Hunter Holman  
Hunter Holman  
Staff Attorney  
Utah Clean Energy

/s/ Howard Geller  
Howard Geller  
Executive Director  
Southwest Energy Efficiency Project

CC: Michael Snow, Rocky Mountain Power  
Brenda Salter, Division of Public Utilities  
Cheryl Murray, Office of Consumer Services