

April 16, 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, UT 84114

Attention: Gary Widerburg  
Commission Secretary

Re: **Reply Comments – 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

On February 11, 2019, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment period in the above referenced matter, allowing parties to file comments by February 25, 2019, and reply comments by March 1, 2019. On March 8, 2019, the Commission issued an Order Suspending Tariff and Notice of Schedule Conference. On March 14, 2019, the Commission issued a Scheduling Order for a technical conference to be held March 26, 2019, and to enable a second round of comments and reply comments due April 9 and 16, 2019, respectively. The Division of Public Utilities (“DPU”), Office of Consumer Services (“OCS”), and Utah Clean Energy / Southwest Energy Efficiency Project (“UCE/SWEEP”) filed comments by the April 9, 2019 due date. Rocky Mountain Power (the “Company”) files these reply comments in response to the second round of comments.

The DPU’s comments recommended approval again of the proposed modifications, with further recommendations to require the Company to:

1. Provide a report on customer segmentation to help determine if small customer participation increases with the new structure; and
2. Provide a report on the large customers that receive a reduced incentive based on the kWh to watts structure.

The OCS’ comments recommended approval again of the proposed modifications, with further recommendations to require the Company to:

1. Monitor and report to the Steering Committee on how each segment is performing; and
2. Report to the Steering Committee on each alternative DSM project approved by the Company.

UCE/SWEEP’s comments recommended approval of the proposed modifications, with further recommendations to require the Company to:

1. Provide periodic updates on the segmentation participation to the Steering Committee; and
2. Report on the number and nature of customer complaints received once customers are segmented.

All parties requested the Company to update the Steering Committee on segmented participation levels. The Company agrees with this request and will plan on discussing this information at a future Steering Committee meeting. The Company will also track and report on alternative DSM projects approved by the Company, as requested by the OCS.

With respect to the DPU's second recommendation, the Company does not intend to calculate what every large customer's incentive would have been under the old \$-per-kWh saved structure if the new \$-per-watt reduced structure is approved. The Company's various offerings and incentive amounts over the past several years have been adjusted, increased, decreased, and redesigned several times and have not been compared against one another. The focus has generally been about cost-effectiveness and the public interest, which has been demonstrated in this docket and supported by party comments. Extremely-high-hour customer facilities that may see a decreased incentive under the \$-per-watt reduced structure will be no different than customers that have seen decreased incentives for other measures with previous adjustments. The purpose of these changes is to continue to move the market towards more energy efficient behavior in a cost-effective manner, and pursuant to the information provided in this docket, the Company believes the proposed incentives will accomplish that. The Company will continue to monitor all its program offerings to ensure they are operating as intended and to manage them cost-effectively.

With respect to UCE/SWEEP's second recommendation, the Company provides a report on customer complaints as part of the DPU's annual DSM audit. The last report was provided as part of the 2017 DSM audit through responses to the DPU's data requests in Docket No. 18-035-19. The Company can provide these reports to UCE/SWEEP upon request each year during the DPU's audit.

The Company appreciates parties' active engagement in its programs to instill a culture of continual improvement and to ensure programs remain cost-effective and in the public interest. The Company believes the proposed changes in this docket are an overall improvement for customers and will promote more energy efficient behavior in the market.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is fluid and cursive, with the first name being the most prominent.

Michael S. Snow  
Manager, DSM Regulatory Affairs

Enclosures

## **CERTIFICATE OF SERVICE**

Advice No. 19-01  
Docket No. 19-035-T01

I hereby certify that on April 16, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

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