BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Demand Side Management Cost Recovery by PACIFICORP dba UTAH POWER & LIGHT COMPANY	)))	Docket No. 02-035-T12

LIST OF ISSUES OF THE SOUTHWEST ENERGY EFFICIENCY PROJECT AND THE LAND AND WATER FUND OF THE ROCKIES

Pursuant to the Utah Public Service Commission's June 18, 2003 Revised Scheduling Order in the captioned docket, the Southwest Energy Efficiency Project (SWEEP) and the Land and Water Fund of the Rockies (LAW Fund) request that the following issues be considered at the working group meetings scheduled in this docket:

1. Regarding PacifiCorp's proposal, should the demand side management (DSM) costs incurred in a particular year be recovered that year (based on a forecast of DSM costs) or in the subsequent year once actual costs are incurred?

2. Regarding PacifiCorp's proposal to use a "uniform percentage spread across customer classes," how does this approach allocate costs to specific classes on a percentage basis, and how does this compare to class participation in DSM programs historically (for example, during 2001 through 2003 (projected)) on a percentage basis? In other words, what percentage of total DSM costs would be paid by the residential, commercial and industrial classes and what percentage of program services (rebates, audits, training, etc.) would each class receive? Consideration should be given to both the adoption and rejection of the proposed industrial self-direction provision.

3. What is the appropriate size threshold for eligibility to participate in the self-direction provision?

4. Regarding the Utah Association of Energy Users' (UAE) self-direction proposal, how would the cost of projects that serve multiple purposes including saving energy be ascertained for the purpose of determining the self-direction credit? For example, if a motor burns out in an industrial facility and has to be replaced, and the industry purchases a premium efficiency motor, is the eligible cost the total cost of the new motor or the incremental cost between a standard and premium efficiency motor? Likewise, if a new high efficiency electric arc furnace is installed to replace an aging, outdated furnace, is the eligible cost the entire cost of the new furnace or the incremental cost for the more efficient furnace?

5. Is it reasonable to allow a) aggregation of meters by the same company in order to meet the usage requirement, or b) aggregations of customers/companies in order to meet the usage requirement?

6. UAE states that in the case of new construction or expansions to existing facilities, efficiency measures in excess of “industry standards” would be eligible based on their incremental cost. How would “industry standards” be determined in areas where there are little or no data on average energy efficiency levels?

7. Should companies that use the self-direction provision be required to demonstrate the eligible project did indeed have a 1 to 5 year payback after the project is implemented and actual energy use occurs?

8. Should companies that elect to use the self-direction provision be eligible to participate in DSM programs and services, apart from the project(s) for which they are claiming self-direction credits?

9. Should companies that have already implemented DSM projects be allowed to claim any self-direction credit assuming some sort of self-direction provision begins in 2004?

10. Should there be a sunset date on the DSM tariff rider?

11. Should the available credit under a self-direction provision equal 75% or 80% of the costs of eligible energy efficiency projects, as proposed by PacifiCorp and UAE, respectively? Or should there be a different “multiplier” to determine how much of the project cost is eligible for the self-direction credit?

12. Should customers eligible for self direction who demonstrate they have implemented all efficiency opportunities with less than 5 year payback receive an exemption from paying any of the charges associated with the tariff rider?

Respectfully Submitted,

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