



201 South Main, Suite 2300
Salt Lake City, Utah 84111

April 27, 2009

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

Attention: Julie P. Orchard
Commission Secretary

Re: Proposed Revisions to the Utah Demand Side Resource Program Performance Standards Pursuant to Commission Order in Docket No. 07-035-T04.

Since 1995, Rocky Mountain Power (“the Company”), Utah regulators and other interested parties have relied upon the same set of standards and guidelines to review the prudence of proposed and existing demand side management programs. These standards and guidelines are in Appendix VII of the Demand Side Resource Cost Recovery Collaborative Report, filed in March 1995 under Docket No. 92-2035-04.

Many of the variables that influence demand side resource acquisitions have changed significantly since the adoption of the existing guidelines in 1995. In recognition of this, the Commission in its order in Docket No. 07-035-T04 directed the Company, the Division of Public Utilities and the DSM Advisory Group to:

“...develop and submit for Commission consideration recommendations concerning the DSM design, approval, implementation and evaluation processes.”¹

In response to the Commission’s order, the Company, the Division of Public Utilities and the DSM Advisory Group have prepared the attached collaborative report on Utah Demand Side Management and Other Resources Benefit and Cost Analysis Guidelines and Recommendations. This report proposes several revisions to the 1995 report referenced above. This document is designed to provide the Company, Utah regulators and other interested parties updated guidelines and standards to assess the cost effectiveness and prudence of current and proposed demand side management resources, including small-scale renewable resources.

Rocky Mountain Power respectfully requests that, should the Commission approve the recommendations to the Utah DSM program performance standards proposed in the attached report, the Commission issue a correspondence letter acknowledging its approval of the recommendations.

It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to:

¹ Page 3 of the Utah Public Service Commission’s order in Docket No. 07-035-T04

Utah Public Service Commission

April 27, 2009

Page 2

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon, 97232

Informal inquires regarding this filing should be directed to Dave Taylor, Utah regulatory affairs manager, at 801-220-2923.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation

Enclosures

Cc: DPU
CCS