



JON HUNTSMAN Jr.
Governor
GARY HERBERT
Lieutenant Governor

State of Utah
Department of Commerce
Division of Public Utilities

FRANCINE GIANI
Executive Director

THAD LEVAR
Deputy Director

PHILIP J. POWLICK
Director, Division of Public Utilities

MEMORANDUM

To: Utah Public Service Commission

From: Utah Division of Public Utilities
Philip Powlick
Energy Section
Abdinasir Abdulle, Technical Consultant
Jamie Dalton, Utility Analyst II
Artie Powell, Manager

Date: April 30, 2009

Ref: Docket No. 09-035-T05. Advice Filing 09-05 – Schedule 113 – Cool Cash Incentive Program.

RECOMMENDATION (suspension)

The Division of Public Utilities (Division) recommends the Commission suspend the proposed Tariff changes, Schedule 113 – Cool Cash Incentive Program for the State of Utah, and the replacement sheets – 113.1, 113.2 and 113.3.

ISSUES AND RECOMMENDATIONS

On April 7, 2009, Rocky Mountain Power (Company) submitted its proposed Tariff changes, Schedule 113 – Cool Cash Incentive Program, along with a cost-effectiveness analysis of proposed schedule modifications prepared by the Cadmus Group. However, after its initial analysis, the Division identified several questions regarding the program measure cost effectiveness results that are listed in the analysis. Specifically, the Division cannot determine how the filing's cost effectiveness measures were developed, as it was not provided a copy of the underlying spreadsheet model. According to Commission staff, this model was not included in the filing.

On March 6, 2007, The Commission issued the following order regarding Division access to necessary data and information regarding DSM tariff filings:

The Commission [also] finds it is in the public interest for all future DSM tariff approval filings to contain sufficient information for the Division of Public Utilities and the Committee of Consumer Services to be able to analyze all inputs and assumptions used in the evaluation at both the measure and program level. Specifically, we require that the models used to calculate the benefit cost ratio for each measure and for the programs as a whole, along with the inputs and a list of assumptions used, be submitted as part of the tariff approval filing.¹

The Division argues that the Company's current filing does not comply with the Commission's March 6, 2007 order. We therefore recommend the Commission suspend the proposed changes contained in this filing. We also recommend that the Company file the Cadmus model along with the model used by the program administrator (if it exists) with formulas intact, such that the Division can replicate the filing's cost effectiveness calculations. Upon receiving the supporting material, the Division will complete its review of the Company's requested changes and file its final recommendation with the Commission. The Division also requests that the proposed program effective date be moved to another date that is set approximately three weeks after the model is received by the Commission.

CC: Rea Petersen, DPU
Jeff Larsen, RMP
Dave Taylor, RMP
Jeff Bumgarner, RMP
Don Jones, RMP
Michele Beck, CCS

¹ Utah PSC, Suspension Order, Docket No. 07-035-T04, Schedule No. 113, 2007 Cool Cash Incentive Program, March 6, 2007, p. 3.