

December 22, 2010

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Julie P. Orchard  
Commission Secretary

Re: Rocky Mountain Power Cool Keeper Program, Schedule No. 114  
White-Rodgers Malfunctioning Programmable Thermostat

As part of the Cool Keeper Demand Response Program, commercial customers may receive a programmable thermostat in lieu of an annual monetary bill credit. This Cool Keeper thermostat is programmable by the customer via the Web. The thermostat is also the device that acts to control a Cool Keeper participant's unit in a demand response event. Comverge, Inc. is the administrative vendor for this program and as such is responsible for the purchase and distribution of the thermostats.

Comverge recently informed PacifiCorp that the manufacturer of the Cool Keeper thermostat, White-Rodgers, reported a malfunction with the model supplied to the Cool Keeper Program (model number 1F88). White-Rodgers informed Comverge that there is a potential for battery leakage, which could result in a potential risk of a fire in the 1F88 thermostat. Out of 188,000 thermostats distributed in North America, only 3 incidents have occurred; no incidents have been reported in Utah. There are 743 Rocky Mountain Power Customers that have the White-Rodgers 1F88 thermostat currently installed.

White-Rodgers reported the issue to the Federal Consumer Product Safety Commission with a corrective action plan, which was approved on December 7, 2010. The corrective action plan involves, removing the batteries and installing warning labels in all 1F88 thermostats. The thermostat does not need the batteries to operate properly. The batteries are in the thermostat only as a backup for the clock in the event of a power loss. Cool Keeper customers normally receive a signal from the pager system twice a day that will reset the thermostat clock.

For thermostats already installed in the field, a mailing packet with instructions will direct the customer to remove the batteries from the thermostat. Included with the packet is a plastic plug for insertion into the battery compartment to help prevent future battery usage, warning label sticker, and a postage paid card to be returned to the vendor to inform that the corrective action has taken place. In addition, the vendor will operate and staff a call center for customers who need additional information and/or help.

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Comverge will also maintain a website that consumers can access to learn more about the corrective action, watch a video of the corrective action being done and register that the corrective action has been completed. Comverge will be tracking the rate at which the corrective action plan is implemented. Each consumer will be assigned a registration number. If a customer requests assistance implementing the corrective action, or if a thermostat shows any damage associated with the defect, the thermostat will be replaced at the cost of White-Rodgers.

The corrective action plan and measures taken will be tracked and validated to insure that all customers have been informed of the issue and that each customer, or Rocky Mountain Power, has taken the necessary steps to correct the problem.

If you have any questions, please feel free to contact Dave Taylor at 801-220-2923 or Jason Berry at 801-220-3443.

Sincerely,

Jeffrey K. Larsen  
Vice President, Regulation

cc: DSM Advisory Committee