



GARY R. HERBERT  
*Governor*

GREG BELL  
*Lieutenant Governor*

State of Utah  
DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
*Director*

To: The Public Service Commission of Utah

From: The Office of Consumer Services  
Michele Beck, Director  
Danny A.C. Martinez, Utility Analyst  
Cheryl Murray, Utility Analyst

Copies To: PacifiCorp  
Jeffrey Larsen, Vice President, Regulation  
Aaron Lively, Regulatory Manager

The Division of Public Utilities  
Chris Parker, Director  
Artie Powell, Energy Section Manager

Date: February 15, 2011

Subject: Advice No. 11-01, Schedule 113 – Evaporative Cooling and Central Air Conditioning Incentive Program (Cool Cash Incentive Program), Docket No. 11-035-T01

### Background

On January 25, 2011 Rocky Mountain Power (the “Company”) filed proposed tariff sheets for Schedule 113 by adding rigid media evaporative cooling systems to the list of eligible technologies under the premium measures of the Cool Cash Incentive Program. The Company states that the costs and energy savings for rigid media systems are comparable to those associated with other evaporative systems. Adding rigid media evaporative systems will not adversely affect the cost-effectiveness of the Cool Cash Incentive program.

### Discussion

Rigid media evaporative cooling systems have existed since the 1960’s. However, the systems were primarily built for large commercial and industrial type of equipment. In the late 20th and early 21<sup>st</sup> centuries, rigid media was used in single-inlet formation coolers. Single-inlet evaporative coolers are eligible for rebates within Schedule 113. Currently under Schedule 113, evaporative coolers are labeled according to operational design and

not on the evaporative media. The Company's current proposal adds newer "rigid media evaporative coolers" to its offerings under Schedule 113.

Since rigid media is a component of evaporative coolers, denoting it as a type of evaporative operating system would be erroneous for tariff purposes. Operational designs using rigid media include multi-inlet systems and other configurations dedicated to residential purposes. Yet these technologies may not be limited solely to rigid media. The Office supports the use of rigid media in evaporative cooler systems for incentives, yet as drafted, the tariff may be excluding technologies that would contribute to reducing energy costs to residents and producing energy savings. Given these concerns, we discussed this matter with the Company and crafted new language addressing the Office's concerns.

### Recommendations

The Office recommends that the Company includes within Schedule 113, the following language to reflect consistency in the tariff language and support for rigid media evaporative systems:

"Premium evaporative equipment must be an indirect, indirect/direct or direct system utilizing rigid media.