



State of Utah
Department of Commerce
Division of Public Utilities

FRANCINE GIANI
Executive Director

THAD LEVAR
Deputy Director

CHRIS PARKER
Director, Division of Public Utilities

GARY HERBERT.
Governor
GREG BELL
Lieutenant Governor

ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Utah Division of Public Utilities
Chris Parker, Director
Energy Section
Artie Powell, Manager
Thomas Brill, Technical Consultant
Abdinasir Abdulle, Technical Consultant

Date: April 20, 2011

Re: 11-035-T03 – Schedule 114 - Cool Keeper Program

RECOMMENDATION (Approval)

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) approve Rocky Mountain Power's (Company) proposed modifications to the Cool Keeper Program tariff (Schedule 114) effective April 27, 2011. The Division also recommends the Company include in the tariff a list of possible contacts available for the customers to contact the Company or the Administrator.

ISSUE

On March 28, 2011, the Company filled its proposed modifications to the Cool Keeper Program (Schedule 114) with the Commission. The proposed modifications are intended to improve the clarity of the program tariff language and to align the tariff language with current program operation. The Company also requested an effective date of April 27, 2011. On March 29, 2011, the Commission issued an Action Request for the Division to investigate the Company's proposed modifications and report its findings and recommendation to the Commission by April 20, 2011. This memorandum represents the Division's response to the Action Request.

DISCUSSION

On March 28, 2011, the Company proposed a number of modifications to Schedule 114. These modifications range from elimination of sections of the tariff, introduction of new sections into the tariff, and addition of new tariff language. The Eligibility section and the Description section were eliminated. The content of the Eligibility section was incorporated into the Applicable section. The Description section has been renamed as system operation. A new section named System is added. This section contains some of the language in the Purpose section.

In its filing, the Company proposed the following new language to be added into the Applicable section:

“Partial use facilities may be denied Program participation at the discretion of the Company despite meeting all other Program requirements for participation.”

The partial use facilities are facilities in which the air conditioner or the heat pump is not regularly operating during the program season. Allowing customers with partial use facilities to participate in the program and receive the incentive while their facilities are not available for dispatch would impact the program efficiency. The inclusion of the above language would allow the Company to deny participation for customers whose facilities are expected to contribute to the level of dispatchable loads. The Division believes that the inclusion of the above proposed language is reasonable and would make the program more efficient. Therefore, the Division recommends the Commission approve the additional language.

The Cool Keeper program is administered by a Program Administrator. The Administrator will be paid based on the contractual agreement between the Company and the Administrator. Language addressing this is eliminated for it is not relevant to the Company’s interaction with its customers.

Regarding customer communications with the program administrator and the Company, there are a number of contact channels including, but not limited to, the call center and program web site (www.coolkeeper.net). The reference to only the Cool Keeper Call Center in the tariff is too restrictive. Consequently, the Company is proposing to eliminate such reference. The Division

agrees that the reference to the Cool Keeper Call Center is restrictive. However, the elimination of this reference leaves the tariff with no contact information for customers. Therefore, the Division recommends, instead of eliminating the reference to the call center, to include in the tariff a list of possible contacts channels that the customer could use to contact the Company or the Administrator.

Other proposed language changes include 1) elimination of the requirement for customers to confirm their continued enrollment in the program if the incentive is reduced; 2) expansion of the language governing program participation for customers who reside in rental housing; 3) modifications to the Control Signal Area to allow participation in the program outside the Control Signal Area if the device could receive a signal; 4) and many other language changes intended to improve clarity of the program tariff language and align the tariff language with current program operation. In its filing, the Company indicated that these proposed changes were not expected to materially impact the cost-effectiveness of the program and consequently neither performed a sensitivity analysis nor projected cost-effectiveness.

The Division reviewed the proposed modifications to the program and concluded it to be reasonable. Therefore, the Division recommends that the Commission approve the Company's proposed modifications to the Cool Keeper Program, Schedule 114.

CC: Dave Taylor, RMP
Michele Beck, OCS