

June 9, 2011

***VIA ELECTRONIC FILING
AND HAND DELIVERY***

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

Attention: Julie P. Orchard
Commission Secretary

Re: Docket No. 11-035-T03 – Proposed modifications to the Cool Keeper program
(Schedule 114)

Rocky Mountain Power (the “Company”) filed on March 28, 2011 Tariff Advice No. 11-03 with the Commission. This matter was subsequently assigned to the above referenced docket. The filing proposed modifications to the Cool Keeper program tariff (Schedule 114) intended to: 1) improve the content of the tariff from an organizational perspective; 2) add clarity to program delivery parameters and participation requirements; and 3) eliminate tariff language that is outdated and/or no longer relevant to the operation of the program.

On April 20, 2011, both the Division of Public Utilities (the “Division”) and the Office of Consumer Services (the “Office”) filed comments with the Commission concerning the Company’s filing. In response to the comments of the Division and Office, the Commission issued an order on April 27, 2011 suspending the Company’s filing pending further investigation of the proposed tariff modifications. On May 16, 2011, Rocky Mountain Power filed comments in response to the comments of the Division and Office along with proposed revisions to Schedule 114 in addition to the tariff modifications originally proposed by the Company in this proceeding. Subsequently, on May 24, 2011, both the Division and Office filed reply comments to the Company’s May 16, 2011 submittal. Through the comments of parties in this proceeding, several matters concerning the appropriate language to describe program parameters in the tariff have been addressed. Through its comments in this proceeding, the Company has agreed to new tariff language and/or proposed alternate language for the Commission to consider for all but one of the points of contention.

The remaining tariff language issue to be resolved in this proceeding concerns the Company’s proposal to include language in the program tariff which specifies the Company may deny program participation to customers if their otherwise program qualifying cooling equipment is not expected to operate on a regular basis during the program control season. While both the Division and Office are supportive of this concept, the Office has contended that language in the program tariff explaining the purpose of the partial use provision is warranted. In their comments

submitted in this proceeding on May 24, 2011, the Office proposed the following language to address the partial use facility provision:

“Customers participate in the program during the summer control period. The summer control period is typically but not limited to high load, day time hours. Customers may be denied participation if they are not regularly operating qualified equipment during the summer control period.”

Rocky Mountain Power is agreeable to including in the program tariff language which more fully describes the partial use facility provision. In consultation with the Office, the Company developed the following language to describe the partial use facility provision in the program tariff. Both the Division and Office have expressed their support of this language to the Company.

“Program participation may be denied to Customers whose Qualifying Equipment is not regularly in operation during the Summer Peak Period at the discretion of the Company despite meeting all other Program requirements for participation.”

This language would appear in the Applicable section of the Cool Keeper program tariff on Sheet 114.1. For convenience of the Commission, Rocky Mountain Power has added the proposed language in redline form to tariff sheet 114.1 that was filed in Tariff Advice No. 11-03 and is providing this tariff sheet as an attachment to this filing.

With the agreement of this language between parties, Rocky Mountain Power believes that all points of contention between the Division, Office and the Company concerning appropriate tariff language to address Cool Keeper program parameters have been addressed.

Please direct any inquires concerning this matter to Aaron Lively, regulatory manager, at (801) 220-4501.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation

cc: Division of Public Utilities
Office of Consumer Services

Enclosures