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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Advice No. 11-13 of Rocky Mountain Power for Approval of Proposed Reduction to the Schedule 193 (the "DSM Surcharge") Collection Rate Tariff Sheets	<u>DOCKET NO. 11-035-T14</u> RESPONSE OF THE UTAH ASSOCIATION OF ENERGY USERS TO PETITION FOR SUSPENSION OF ADJUSTMENTS TO SCHEDULE 193
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The Utah Association of Energy Users (UAE) submits this response to the Petition of Utah Clean Energy, Southwest Energy Efficiency Project, and Western Resource Advocates for suspension of Rocky Mountain Power's proposed adjustment to Schedule 193 (Petition).

UAE is an active participant in the DSM Advisory Group and supports highly cost-effective DSM programs. UAE supports the Petition insofar as it requests suspension of the proposed Schedule 193 adjustment in order to give the DSM Advisory Group and the Commission time to evaluate whether additional highly cost-effective DSM programs and increased incentives for existing highly cost-effective DSM programs should be adopted, whether a fixed DSM surcharge should be utilized in place of a surcharge subject to adjustment (with over-recoveries used to fund new and enhanced DSM programs and under-recoveries

converted into a regulatory asset), as well as other potential changes to existing DSM policies and programs.

UAE recently filed comments with the DSM Advisory Group advocating a number of changes to existing DSM programs and policies, including the use of a fixed DSM surcharge and adoption of certain new DSM programs and enhanced incentives for existing DSM programs that have been shown to be highly cost-effective. UAE anticipates that these suggestions, along with suggestions submitted by other parties, will be analyzed by the DSM Advisory Group over the next several months. UAE believes that it is reasonable and in the public interest to leave the existing DSM surcharge in place while these issues are being evaluated and presented to the Commission for consideration. Otherwise, a significant increase in the DSM surcharge is likely within several months, a circumstance that is not palatable to many customers.

UAE submits that regular changes in the amount of the DSM surcharge are not in the public interest and that a reasonable fixed DSM surcharge should be adopted, so long as amounts collected through the surcharge are used within a reasonable time for new or enhanced DSM programs and incentives that have been shown to be highly cost-effective.

The Petition is consistent with many of the UAE comments submitted to the DSM Advisory Group. UAE thus supports the Petition for the reasons and purposes specified above.

Dated this 19th day of December, 2011.

Hatch, James & Dodge

/s/ _____
Gary A. Dodge,
Attorneys for UAE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by email this ____ day of December, 2011, to the following:

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