

Utah Clean Energy
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**In the Matter of: the Request for a Home
Energy Report Pilot Program**

DOCKET NUMBER: 12-035-77

**Comments of Utah Clean Energy and
Southwest Energy Efficiency Project**

I. INTRODUCTION & RECOMMENDATION

These comments are being submitted on behalf of Utah Clean Energy and the Southwest Energy Efficiency Project (SWEET). Utah Clean Energy and SWEET recommend the continuation of Rocky Mountain Power's Home Energy Report (HER) program as a full-fledged program, as proposed in the Company's December 22, 2017 filing.

II. DISCUSSION

This continuation of the HER program is being proposed at this time since the pilot phase of the program expired at the end of December 2017. Continuing an HER program on a large scale is an important strategy to increase awareness of electricity consumption while helping to increase participation in Rocky Mountain Power's other DSM programs.

According to the Company's filing, the HER program will remain cost effective in 2018, albeit with a lower benefit-cost ratio than previously reported. We understand

that this is due largely to the use of lower DSM decrement values in the 2017 IRP. The program is also cost effective under the TRC and PTRC. Despite this decrease in cost effectiveness, we believe that continuing this program is in the public interest because it plays an effective role in increasing customer awareness about electrical consumption, promotes more energy efficient behaviors, and educates customers about other opportunities to participate in the Company's wattsmart rebate programs. Furthermore, the proposed program continuation will likely result in at least a small amount of additional energy savings in hundreds of thousands of households, thereby helping to maximize participation in one or more DSM programs (and likewise minimize non-participation).

It is our understanding that the proposed full-fledged HER program will continue to include a "performance guarantee," whereby the HER implementer will provide a guarantee that the HER program will provide at least a certain level of electricity savings; if such savings aren't realized, then the cost for the HER program would be discounted. For example, if the program delivered 10% less electricity savings, then the HER contractor would discount its cost to the Company (ratepayers) by 10%. This is an important feature of this program that is designed to keep the program cost effective. Utah Clean Energy therefore supports the continuation of this performance guarantee, as proposed.

It is also our understanding that through the RFP process one respondent proposed the addition of electricity consumption disaggregation by appliance in the full-fledged program. This kind of program design would be a welcome addition to a "next generation" HER program. This new program element would provide customers with

new insights about how to conserve electricity and participate in energy efficiency rebate programs in a way that corresponds directly to their unique electricity consumption patterns. Furthermore, adding a new program element such as this could help legacy participants, who have been participating since the program was launched, find renewed interest and reward for their ongoing interest in their home energy reports.

III. CONCLUSION

Utah Clean Energy and SWEEP recommend that the Utah Public Service Commission approve Rocky Mountain Power's proposal to transition the HER pilot program to a full-fledged program.

Thank you for considering these comments. Please feel free to contact me if you have questions about these comments.

RESPECTFULLY SUBMITTED,

Utah Clean Energy

/s/ Kevin Emerson_____

Kevin Emerson

Program Director for Utah Clean Energy

CERTIFICATE OF SERVICE

Docket No. 12-035-77

I hereby certify that a true and correct copy of the foregoing was served by email this 9th of January, 2018, on the following:

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