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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval to Cancel Schedule 194

DOCKET NO. 13-035-136

Comments of Utah Clean Energy

BACKGROUND

On August 14, 2013, Rocky Mountain Power (the Company) filed an application to cancel Schedule 194—the Demand-Side Management (DSM) Cost Adjustment Credit—which was created in early 2012 to return an over-collected balance of the DSM surcharge. In its application, the Company explained that cancelling Schedule 194 while retaining the current DSM surcharge will fund the transition from the expiring Cool Keeper program to a new one within 24 months. On August 20, the Commission issued notice of a comment period and hearing. Utah Clean Energy submits these comments in support of the Company’s application pursuant to the Commission’s notice.

COMMENTS

Utah Clean Energy has not evaluated the DSM balancing account analysis attached to the Company’s application to cancel Schedule 194, but supports the concept of cancelling the Schedule 194 surcredit to fund the transition of the current (expiring) Cool Keeper program to a utility-owned, two-way communicating load controlsystem. Utah Clean Energy bases its support

on the principles of aggressively pursuing cost-effective DSM programs expeditiously and maintaining a robust and stable DSM surcharge. The Schedule 194 surcredit mechanism has been a useful tool for maintaining DSM account balance while simultaneously maintaining a steady collection rate for DSM program funding. At this time, however, given that the current Cool Keeper program is expiring, and given that the Company's integrated resource plan anticipates an acceleration of cost-effective DSM resource acquisition, Utah Clean Energy supports canceling the surcredit in order to fully utilize the DSM surcharge to acquire cost-effective DSM resources.

Insofar as it supplements our support of canceling the DSM surcredit, but without venturing too far into commenting on anticipated changes to the Cool Keeper program, Utah Clean Energy supports the Company's reasons for selecting a two-way communicating load control system, as outlined in its Application (pages 7-8). A two-way communicating program will allow the Company to monitor and control this important demand response resource and better position the Company to take advantage of more advanced communication and load control systems in the future.

Utah Clean Energy recommends that the Commission approve the Company's application to cancel Schedule 194.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 29th day of August, 2013, on the following:

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