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DEPARTMENT OF COMMERCE  
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Date: March 24, 2014

Subject: Docket 14-035-T01

**In the Matter of:** Revisions to Schedule 114 – Air Conditioner Direct Load Control Program (A/C – DLC) (Cool Keeper)

### **Background**

On March 7, 2014 Rocky Mountain Power Company (Company) filed with the Public Service Commission (Commission) a proposal to modify the tariff sheets to Schedule 114 (Cool Keeper). The Commission subsequently issued a Notice of Filing and Comment Period on March 10, 2014.

### **Discussion**

On February 12, 2014 the Company held a meeting with the Demand-Side Management (DSM) Steering Committee which was created in Docket 12-035-69. The proposed changes to the tariff were presented and discussed.

The Office of Consumer Services (Office) has reviewed the changes as presented in the filing. The Office agrees with all of the proposed changes but recommends additional clarifying language in one section of the tariff. Page 114.4 under Provisions

of Service has been modified to include a means by which certain commercial customers can participate in the program. The Company has found that some commercial customers have separate cooling zones and that some of these zones are cooled by Qualifying Equipment similar to a residence. The Company wants to include these customers in the program by allowing participation by qualifying climate zones rather than the entire facility. .

The Office agrees with the Company in allowing the participation of separate climate zones that are cooled by Qualifying Equipment. However, the Office proposes some changes to the language of the new paragraph on page 114.4. In the last paragraph on the page the wording as filed states: "If the Commercial customer has more than one climate control zone, they are not required to have all climate zones participate, however an entire climate zone must participate." The Office recommends that this sentence be amended to read: "If the Commercial customer has more than one climate control zone, they are not required to have all climate zones participate, however all units used in cooling the participating climate zone must be Qualifying Equipment units and must be equipped with a Load Control Device and be available to respond to Program Dispatch Events." The Office asserts that this language is more precise in describing the terms of participation; furthermore much of this language has been taken from the previous paragraph regarding residential customers. This new language will bring the terms for commercial climate zones in line with the terms for residential customers.

The Office presented this new language to the Company on March 18, 2014; the Company had no objections the new language and is anticipating the Office to propose the new language in its Comments.

### **Recommendations**

1. The Office recommends that the Commission approve the Company's tariff revisions as filed except for page 114.4.
2. The Office recommends that the Commission require the Company to amend page 114.4 with the language articulated by the Office and found in the attachment to this memo.

