

Gary A. Dodge, #0897
HATCH, JAMES & DODGE
10 West Broadway, Suite 400
Salt Lake City, UT 84101
Telephone: 801-363-6363
Facsimile: 801-363-6666
Email: gdodge@hjdllaw.com
Attorney for UAE

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power's Annual Demand Side Management Nov. 1st Deferred Account and Forecast Reporting	Docket No. 15-035-48 COMMENTS OF THE UTAH ASSOCIATION OF ENERGY USERS
--	--

Pursuant to the Commission's November 4, 2015 Notice of Filing and Comment Period in this docket, the Utah Association of Energy Users ("UAE") files these comments in response to the DSM forecast filed by Rocky Mountain Power ("RMP").

RMP made its filing in order to comply with requirements imposed by past stipulations and Commission orders. UAE has no objection to the filing per se and no basis for considering the filing out of compliance with the requirements of those prior stipulations and orders. UAE is nevertheless filing these comments to alert the Commission to the fact that UAE has become concerned over significant over-spending on DSM programs, increases to the DSM surcharge, and the current and projected levels of the DSM surcharge.

UAE has traditionally supported most DSM programs that have been clearly demonstrated to be cost-effective. For some time, however, UAE has expressed serious concerns about what appears to be an ever-increasing DSM surcharge level, as well as cost-overruns in certain DSM programs. UAE has proposed alternative methods of amortizing and collecting DSM expenditures, as well as cost caps, to no avail. UAE believes that it is time for an investigation to be opened into current and proposed DSM programs, the DSM surcharge level, appropriate DSM cost controls, appropriate means of recovering DSM expenditures and appropriate cost-effectiveness measures.

Accordingly, while UAE has no objection to Commission acknowledgment of RMP's filing in this docket as in compliance with prior Commission orders, UAE respectfully requests that the Commission open an investigation into the DSM and funding issues identified above.

Respectfully submitted this 2nd day of December, 2015.

HATCH, JAMES & DODGE

/s/ _____
Gary A. Dodge
Attorney for UAE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 2nd day of December 2015, on the following:

Jeff Richards
Bill Comeau
Rocky Mountain Power
robert.richard@pacificorp.com
william.comeau@pacificorp.com

Chris Parker
Artie Powell
Brenda Salter
Dennis Miller
Division of Public Utilities
chrisparker@utah.gov
wpowell@utah.gov
bsalter@utah.gov
dennismiller@utah.gov

Michele Beck
Cheryl Murray
Utah Office of Consumer Services
mbeck@utah.gov
cmurray@utah.gov

Patricia Schmid
Justin Jetter
Assistant Attorney General
pschmid@utah.gov
jjetter@utah.gov

Rex Olsen
Assistant Attorney General
rolsen@utah.gov

/s/ _____