

April 24, 2015

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

Re: Reply Comments  
In the Matter of Rocky Mountain Power's Proposed Revisions to Electric Service  
Schedule No. 140, Non-Residential Energy Efficiency– Docket No. 15-035-T04

On March 31, 2015, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment period, allowing parties to file comments by April 14, 2015. The Division of Public Utilities (“DPU”) filed comments on April 13, 2015, and the Office of Consumer Services (“OCS”) filed comments on April 14, 2015. The Commission issued an Amended Notice of Comment Period April 16, 2015, allowing parties to file reply comments by April 24, 2015. Rocky Mountain Power (“Company”) provides these reply comments in response to DPU’s and OCS’ comments.

With respect to OCS’ concerns regarding the 70% cap on total lamp cost, the Company agrees to monitor market pricing for LEDs and make timely changes to the incentives to target incentives at 30-40% of the incremental cost. This is an integral part of the program delivery plan to accommodate both variability in pricing for like LEDs in the marketplace and expected reductions in the cost of LED products over time.

With respect to OCS’ recommended adjustment to tariff sheet 140.2, the Company agrees that “N/A” is a more appropriate description of the cost cap treatment for mid-market incentives on tariff sheet 140.2. The Company has included aforementioned proposed revisions to tariff sheet 140.2 in Exhibit A, attached hereto.

The Company discussed these changes with OCS and DPU, and also provided a draft of these reply comments and Exhibit A prior to filing. OCS and DPU are in agreement with the proposed revisions and that they satisfy the concerns OCS articulated in their comments.

Informal inquiries regarding this filing may be directed to Michael Snow, DSM Regulatory Projects Manager, at (801) 220-4214.

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Sincerely,

Bill Comeau

Director, Demand Side Management

cc: Division of Public Utilities  
Office of Consumer Services