

June 8, 2015

UTAH PUBLIC SERVICE COMMISSION
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

RE: Docket No. 15-035-T08 – In the Matter of Rocky Mountain Power’s Proposed Revisions to Electric Service Schedule No. 140, Non-Residential Energy Efficiency Program

Dear Public Service Commission,

On May 22, 2015 Rocky Mountain Power filed its proposed revisions to Electric Service Schedule No. 140, Non-Residential Energy Efficiency Program, and on May 27, 2015 the Commission issued a Notice of Filing and Comment Period asking interested parties to submit their comments on Rocky Mountain Power’s proposed revisions on or before June 8, 2015. Utah Clean Energy is hereby submitting these comments regarding the changes proposed by Rocky Mountain Power to the Non-Residential Energy Efficiency Program.

Utah Clean Energy sees the high uptake of the small business enhanced lighting program as a positive sign that small businesses in Utah desire this type of program. The fact that, as of May 1, 2015, the program already achieved 121% of its annual 2015 goal is a positive sign for this program. The program is clearly meeting customer demands and realizing the goal delivering cost-effective electricity savings from this hard-to-reach customer segment.

While Utah Clean Energy would prefer to see this important program modified and continued *without* suspension, we realize that the \$/kWh cost for this program is higher than all of the Company’s other programs and that the Company has identified fundamental issues with how the program was designed that need to be addressed to further improve the program’s cost effectiveness. Therefore, we support the Company’s proposal to temporarily suspend the enhanced small business lighting incentive program for reevaluation, and have several requests below as part of our position.

Given that enhanced small business lighting incentive program has seen significant interest among businesses in Utah, we request that Rocky Mountain Power to review the current



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shortfalls in the program with the goal to re-launch the program as quickly as possible – no later than January or February of 2016. We believe that cancelling the program for a year or more may affect its uptake in the market and may also lead to contractors losing interest in participation. As Rocky Mountain Power looks into redesigning the program, we recommend the company to involve the “on the ground” contractors and take into account their concerns and interests as a part of the new program.

Furthermore, we recommend that the Company investigate the opportunities to expand the program to beyond lighting to incorporate small business HVAC improvements, smart thermostats, controls, etc. as part of the re-design. As the implementation contractors go out in the field and engage with small businesses on the enhanced lighting incentive, it would valuable if they simultaneously promoted other cost-effective measures, with the goal of delivering additional electricity savings.

Finally, we request that the Company convene the DSM Steering Committee for a follow up meeting during the program re-design process to explain how these recommendations, and those of other parties, are being considered prior to the re-launch of the program.

Sincerely,

Mitalee Gupta
Program and Policy Associate
UTAH CLEAN ENERGY



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 8th day of June, 2015 on the following:

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/s/ Sophie Hayes