



State of Utah  
Department of Commerce  
Division of Public Utilities

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## ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Energy Section Manager

Brenda Salter, Technical Consultant

Date: August 4, 2015

Re: **RMP Advice No. 15-12, Proposed changes to Schedule 111 – Home Energy Savings Program**

Docket No. 15-035-T13

## RECOMMENDATION

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) approve Rocky Mountain Power's (Company) proposed changes to the Home Energy Savings Program.

## ISSUE

On July 28, 2015, the Company filed proposed changes to Utah Tariff Schedule 111 Residential Home Energy Savings Program with a requested effective date of August 11, 2015. On July 29, 2015, the Commission issued an Action Request for the Division to investigate the proposed changes to Schedule 111 and report its findings and recommendation to the Commission by August 5, 2015. Subsequently the Commission issued a Notice of Filing and Comment Period giving interested parties until August 5, 2015 to provide comments with reply comments due August 10, 2015. The Division provides these comments in response to the Commission's

Action Request and consistent with the comment period date noted on the Notice of Filing and Comment Period.

## **DISCUSSION**

The Company has been made aware of a loophole in the Home Energy Savings Program where customers can purchase a mini refrigerator for \$100 or less. With the \$100 rebate offered as an incentive to purchase a CEE Tier 3 refrigerator the qualifying mini fridge is essentially free. The program was never intended to cover 100 percent of the cost. In the last couple of weeks social media has dramatically increased the sale of mini fridges which in turn has increased the number of incentive applications. The Company is asking for an expedited effective date of August 11, 2015 in order to curtail the “free mini fridge” campaign on social media and return the program to its originally intended purpose. The Company is updating Schedule 111 to include a minimum of 7.75 cubic feet and a maximum of 32 cubic feet in size for qualifying refrigerators.

The Company is also including changes to clarify the “up to” language for incentive levels in the Home Energy Savings Program. The program currently includes language that allows flexibility to change most of the program incentive levels based on changing codes and standards, sales volumes, measure costs, quality assurance data or to enhance program cost effectiveness. The modification clarifies the language and includes “up to” for all measures in the program.

On July 24, 2015, a draft filing of the Schedule 111 proposed changes was provided to the DSM Steering Committee. As part of the draft review, the Company provided answers to the Division’s questions via telephone regarding the proposed changes.

## **CONCLUSION**

The Division has reviewed the changes as proposed by the Company and recommends that the Commission approve the modifications to Electric Service Schedule 111 with the expedited effective date of August 11, 2015.

CC Bill Comeau, Rocky Mountain Power  
Bob Lively, Rocky Mountain Power  
Michele Beck, Office of Consumer Services  
Service List