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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power's Revisions to Electric Service Schedule No. 193, Demand Side Management (DSM) Cost Adjustment	Docket No. 15-035-T15 COMMENTS OF THE UTAH ASSOCIATION OF ENERGY USERS
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Pursuant to the Commission's December 2, 2015, Scheduling Order and Notice of Hearing in this docket, the Utah Association of Energy Users ("UAE") files these comments in response to the request of Rocky Mountain Power ("RMP") to increase the Schedule 193 surcharge to 4%.

As indicated in UAE's Comments filed on December 2, 2015, in Docket 15-035-48, UAE is concerned with significant over-spending on certain DSM programs, increases to the DSM surcharge, and the current and projected levels of the DSM surcharge. While UAE has traditionally been supportive of DSM programs that are clearly shown to be cost-effective, it has expressed serious concerns over what appears to be an ever-increasing DSM surcharge level,

cost overruns in some DSM programs, and the current DSM funding mechanism. UAE supports the adoption of alternative methods of amortizing and collecting DSM expenditures, as well as cost caps. UAE respectfully submits that an investigation should 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.

UAE objects to RMP's proposed increase in the Schedule 193 surcharge until after an investigation has been conducted into current DSM programs, projected DSM expenditures, cost effectiveness, funding issues and other relevant issues. Until such investigation is complete, UAE submits that RMP should adjust spending consistent with the current surcharge level.

Respectfully submitted this 8th 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 8th day of December 2015, on the following:

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