

December 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-T15 – In the Matter of Rocky Mountain Power’s Proposed Revisions to Electric Service Schedule No. 193, Demand Side Management (DSM) Cost Adjustment

Dear Public Service Commission,

On November 23, 2015 Rocky Mountain Power filed its proposed revisions to Schedule 193, Demand Side Management (DSM) surcharge, and on November 24, 2015 the Commission issued a Notice of Scheduling Conference in this docket. Following the Scheduling Conference held on November 30, 2015 the Commission issued a Scheduling Order and Notice of Hearing on December 2, 2015 asking any interested parties to submit comments on Rocky Mountain Power’s proposed revisions on or before December 8, 2015. Utah Clean Energy and the Southwest Energy Efficiency Project (SWEET) are hereby submitting these comments in support of Rocky Mountain Power’s proposed increase to Schedule 193 DSM surcharge.

On March 3, 2015 the Commission approved Rocky Mountain Power’s (the Company) requested first step increase to the DSM surcharge from 3.30% to 3.62% effective from February 1, 2015. The Company is now requesting a second step increase to the DSM surcharge to 4.0% to be effective from January 1, 2016.

Utah Clean Energy and SWEET believe that increasing the DSM surcharge to 4% represents a middle path that will help the Company achieve higher savings in its DSM programs, while also constraining the DSM Surcharge increase to a level that is agreeable to multiple parties. The DSM Steering Committee discussed this increase at the meeting on October 23, 2015. Our understanding is that if the Company were to maintain its current collection rate of 3.62%, then the Company’s account balance will be under collected by \$12.5 million by the end of December 2015 and under collected by \$8.2 million by the end of December, 2016. Increasing the DSM Surcharge to the proposed 4.0% from January 1, 2016 will bring down the Company’s DSM Balancing account to \$0.5 million.



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Therefore, Utah Clean Energy and SWEEP support the Company's proposal for this second step increase to move the DSM surcharge to 4.0% effective January 1, 2016. Further, we encourage the Company to target their DSM investments around the most highly cost-effective DSM programs to maximize the impact of the DSM program budget.

Sincerely,

Mitalee Gupta
Program and Policy Associate
UTAH CLEAN ENERGY