



GARY R. HERBERT  
*Governor*

SPENCER J. COX  
*Lieutenant Governor*

State of Utah  
DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
Director

To: Public Service Commission

From: Office of Consumer Services  
Michele Beck, Director  
Gavin Mangelson, Utility Analyst

Date: December 15, 2015

Subject: **Reply Comments** Docket 15-035-T15

**In the Matter of:** Rocky Mountain Power's Proposed Revisions to Electric Service Schedule 193, Demand Side Management (DSM) Cost Adjustment

On November 23, 2015 Rocky Mountain Power Company (Company) filed with the Public Service Commission (Commission) a proposal to increase the Sch 193 DSM surcharge (Surcharge).

On December 8, 2015 the Office of Consumer Services (Office) filed Comments requesting that the Commission not approve the Company's request to increase the Surcharge.

In addition to concerns regarding DSM expenditures, and Company legislative initiatives, the Office cited a desire to better understand the position that the Utah Association of Energy Users (UAE) would take in its initial comments. UAE had previously filed Comments in docket 15-035-48 expressing concern over the rising costs of the Company's DSM programs, and requesting a general investigation into the Company's DSM program and practices.

UAE also filed Comments in this docket on December 8, 2015, however, the only elaboration to its position from docket 15-035-48 was a request that the Surcharge not be changed until after the completion of the requested investigation.

Despite the absence of additional detail from UAE, the Office remains concerned about the current costs of the Company's DSM program, and about the potential impact that the Company's legislative initiatives may have on DSM.

The Office recommends that the Commission not approve the Company's request for an increase in the Schedule 193 surcharge at this time.

Copies To: Rocky Mountain Power  
Bill Comeau, Director

Division of Public Utilities  
Chris Parker, Director  
Artie Powell, Energy Section Manager