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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: February 3, 2016

Subject: **Comments** Docket 16-035-T01

In the Matter of: Rocky Mountain Power's Proposed Revisions to Electric Service Schedule 118, Low Income Weatherization

Background

On January 20, 2016 Rocky Mountain Power Company (Company) filed with the Public Service Commission (Commission) a proposal to change the Schedule 118 tariff. On January 25, 2016 the Commission posted a Notice of Filing and Comment Period.

Schedule 118 details a Demand-Side Management (DSM) program intended to reduce load by coordinating with the Division of Housing and Community Development (HCD) to provide energy saving measures to income eligible customers. Eligibility is determined by HCD operating within the Department of Workforce Services. HCD is also responsible for the installation and verifications of the measures for which incentives are paid. The Company's proposed changes to Schedule 118 were partly developed in coordination with HCD in order to better accommodate current market conditions, and to improve measure descriptions in the tariff.

Proposed Changes to Schedule 118

The Office of Consumer Services has reviewed the Company's filing and has had some communication with the Company regarding the proposed changes.

Smart Thermostats

The Company proposes to make Smart Thermostats eligible for an incentive in this program. The tariff language does not define a Smart Thermostat other than to refer to them as “smart thermostats with occupancy sensors”. Page 1 of the advice letter provided with this filing states that “the majority of savings from smart thermostats are a result of occupancy sensing”. However, users that are unsatisfied with the effects of the occupancy sensor, for whatever reason, may generally disable that function. The Nest Learning Thermostat is one such thermostat, and has an occupancy sensor called “Auto-Away”; the support website states that “You can turn Auto-Away off at any time...” (<https://nest.com/support/article/What-is-Auto-Away>). This site also describes circumstances when the Auto-Away feature will not function correctly and suggests that it be disabled in those circumstances. In these situations the savings anticipated from occupancy sensing will not be realized from these thermostats.

Because a majority of the savings is tied to an easily disabled feature, the Office does not support the inclusion of Smart Thermostats in Schedule 118. The Office requests that the Company remove this measure from the proposed revisions.

The Office supports the remaining proposed revisions to Schedule 118.

Recommendation

The Office recommends that the Commission reject the addition of Smart Thermostats as an incentive eligible measure, and approve the remaining revisions to Schedule 118.

Copies To: Rocky Mountain Power
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Division of Public Utilities
Chris Parker, Director
Artie Powell, Energy Section Manager