

February 22, 2016

UTAH PUBLIC SERVICE COMMISSION
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

RE: Docket No. 16-035-T02 – In the Matter of Rocky Mountain Power’s Request to Cancel Electric Service Schedule No. 117, Residential Refrigerator Recycling Program

Dear Public Service Commission,

On December 4, 2015, Rocky Mountain Power (the Company) filed for the suspension of Electric Schedule No. 117, Residential Refrigerator Recycling Program due to the program vendor, Jaco Environmental (“Jaco”), going out of business. On December 23, 2015, the Commission approved the suspension, effective January 4, 2016 and the Order also required the Company to file to revise or cancel Schedule No. 117 by April 1, 2016.

On February 5, 2016 the Company filed its request to cancel the Residential Refrigerator Recycling Program effective date March 6, 2016, and on February 8, 2016 the Commission issued a Notice of Filing and Comment Period asking interested parties to submit their comments on the Company’s proposed revisions on or before February 22, 2016. Utah Clean Energy is hereby submitting these comments regarding Rocky Mountain Power’s request to cancel the Residential Refrigerator Recycling Program.

Utah Clean Energy recognizes high value in the Residential Refrigerator Recycling Program and believes that there is a need for some form of this program to enable appropriate recycling of old refrigerators. In addition to reducing electricity consumption in the residential sector, the program helps prevent a toxic greenhouse gas – Freon, from going into the landfills. We acknowledge the low cost-effectiveness of the program (below 1.0) however, it clearly meets an important objective of keeping the Freon gases out of the landfills and ensuring proper recycling of old refrigerators that still exist in the market.



We Partner to Build the New Clean Energy Economy

We have heard that another company is in the process of purchasing Jaco's assets, with the intention of re-starting the program. We understand that the Commission's Order directed the Company to re-start or cancel this program by April 1, 2016. Yet, given the possibility of another company restarting the program, Utah Clean Energy supports evaluation of strategies to re-launch the program in the near future. Despite its low cost-effectiveness as a stand-alone program, it may be possible to roll refrigerator recycling into another residential program, given the right vendor or opportunity. We request the Company to review the current shortfalls in the program and explore opportunities to re-launch this program with a new vendor and with changes that help improve the program's cost-effectiveness.

Finally, we request that the Company provide an update to the DSM Steering Committee at its next meeting about the status of Jaco's acquisition and opportunities to re-launch the Residential Refrigerator Recycling Program.

Sincerely,

Mitalee Gupta
Program and Policy Associate
UTAH CLEAN ENERGY