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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 24, 2016

Subject: **Comments** Docket 16-035-T03

In the Matter of: Rocky Mountain Power's Proposed Revisions to Electric Service Schedule 140, Non-Residential Energy Efficiency Program

Background

On February 10, 2016 Rocky Mountain Power Company (Company) filed with the Public Service Commission (Commission) proposed changes to the Schedule 140 tariff. The Commission posted a Notice of Filing and Comment Period the same day.

Schedule 140 details a Demand-Side Management (DSM) program intended to reduce load by providing energy efficiency measures to consumers on non-residential service schedules (the tariff also specifies inclusion of dairy barns on residential rate schedules).

Prior to filing the proposed revisions, the Company's provided a preliminary draft of the changes to the DSM Steering Committee. At that time, the Office of Consumer Services (Office) made recommendations to the Company regarding the proposal. The proposed revisions filed on February 10, 2016 reflect the recommendations made by the Office and other members of the Steering Committee through this preliminary process.

Proposed Changes to Schedule 140

“Up to” Incentives

The Company proposes to change tariff language to indicate that incentives are “up to” amounts, rather than current actual incentives. The Office supports the flexibility provided by this change in lowering incentives to coordinate with market conditions. The tariff provides that incentives will not exceed the specified amount; the Company continues to communicate actual incentives on its website and provides adequate notice for changes. The Office has previously supported a similar change for incentives listed in Schedule 111 (Comments filed on August 4, 2015 in docket 15-035-T13). This change will provide an effective means of program and incentive management; and also make Schedule 140 more consistent with the incentive policy described in Schedule 111.

LED Lighting

The proposed revisions to Schedule 140 also include various changes to available measures and incentives for qualifying lighting equipment. These changes are being proposed largely in response to changing market conditions resulting from Light Emitting Diode (LED) technology. As this technology has been developed, more manufacturers and products are being introduced to the market. The proposed changes to lighting measures represent a broad range of LED applications, and are designed to take advantage of available products and respond to the market pricing of those products.

Refrigeration and Appliances

Some changes to refrigeration and appliance measures are being proposed due to current or pending government standards for those products. These changes are also necessary to eliminate free ridership where possible, and encourage the adoption of equipment that outperforms minimum standards in terms of energy efficiency.

Tariff Clarification

In regards to the specific tariff format, Table 1a found on page 140.4 of the tariff and the bottom of page 3 of the advice letter contains measures with no information in the box under “Eligibility Requirements.” Although Note # 4 under this table explains where eligibility information can be located, the Office requests that a basic reference be added to the empty spaces in order to more clearly communicate the location of

the eligibility information for those measures. Any other necessary corrections such as spelling can be made with this additional change.

Conclusion

The Office supports the proposed changes to the Schedule 140 tariff. These changes are being proposed in order to respond to changing market conditions, government standards, and to facilitate effective management of the measures and incentives listed under this schedule. The changes are also estimated to provide the cost effective energy savings that are the primary purpose of Demand-Side Management programs.

Recommendation

The Office recommends that the Commission require reference information be added to the tariff measure tables, and approve the proposed changes to Schedule 140.

Copies To: Rocky Mountain Power
Bill Comeau, Director

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