

February 24, 2016

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

**RE: Docket No. 16-035-T03 – In the Matter of Rocky Mountain Power’s Proposed Revisions to Electric Service Schedule No. 140, Non-Residential Energy Efficiency Program**

Dear Public Service Commission,

On February 9, 2016, Rocky Mountain Power (the Company) filed proposed tariff sheets associated with changes to its Electric Service Schedule 140, Non-Residential Energy Efficiency Program and on February 10, 2016 the Commission issued a Notice of Filing and Comment Period asking interested parties to submit their comments Company’s proposed revisions on or before February 24, 2016.

Utah Clean Energy and Southwest Energy Efficiency Project (SWEEP) have a number of questions regarding the Company’s proposed changes to non-residential lighting. Given that the lighting incentive program has significant uptake among commercial and industrial (C&I) customers in Utah, we recommend the Company evaluates opportunities to target a higher level of cost-effective DSM savings through their proposed changes to the lighting incentives, and we would hence request clarifications on the following issues.

1. We request information on how the actual 2015 DSM budget compares to the approved budget in 2015. Are there any programs that were under budget last year and likely to be under budget this year, from which funding can be transferred to the C&I lighting program?
2. The Company informed the DSM Steering Committee through an email that they will be implementing a Reservation System for issuing incentive offers, to help the Company manage the program budget effectively. Both Utah Clean Energy and SWEEP would like to know the reaction of trade allies to the proposed Reservation System. How many trade allies have issued complaints? We have heard from some concerned trade allies and



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would like to get a sense of the impact on the affected community. We want to ensure that the Company is able to achieve all its planned cost-effective savings from this important program and make sure these changes will not lower participation below anticipated levels.

3. We request more information on when the Reservation System goes into effect. Is the Company committed to providing rebates for all projects that applied to the program prior to this, assuming they get completed this year? The answers to these questions may address some of the trade allies' concerns.
4. We understand that the total wattsmart business budget is about \$35 million for 2016. Of this \$35 million, what is the total anticipated budget for the C&I lighting program for 2016, and what is the anticipated C&I program budget for 2016 with the new reservation system in place?

Utah Clean Energy and SWEEP recommend that the Commission gain clarity on the above mentioned questions prior to approving the Company's proposed changes. Additionally, we recommend that the Company, Commission, and DSM steering committee and advisory groups investigate alternative methods for funding DSM programs, including recovering increased costs for this lighting program, such as amortizing DSM expenses over a longer length of time.

Sincerely,

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Mitalee Gupta  
Program and Policy Associate  
UTAH CLEAN ENERGY