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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power's Proposed Revisions to Electric Service Schedule No. 140, Non-Residential Energy Efficiency Program	Docket No. 16-035-T03 REPLY COMMENTS OF THE UTAH ASSOCIATION OF ENERGY USERS
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The Utah Association of Energy Users (“UAE”) files these comments in response to and support of comments filed in this docket by Utah Clean Energy and the Southwest Energy Efficiency Project (UCE/SWEEP).

As indicated in Comments filed by UAE in various Commission DSM dockets over the past several months, UAE is very concerned with over-spending on certain DSM programs and the ever-increasing DSM surcharge. UAE is generally supportive of DSM programs that are shown to be cost-effective under various cost-effectiveness tests, periodic evaluation of proposed and ongoing DSM programs, alternative methods of amortizing and collecting DSM expenditures, and cost caps. In this docket, UAE is in agreement with UCE/SWEEP that the

commercial and industrial DSM program changes proposed by RMP have not been adequately explored or explained, and that they should not be implemented until the questions posited in the UCE/SWEEP filing, among others, have been adequately answered.

UAE is concerned with sweeping changes to commercial and industrial DSM programs, and potential impacts on customers seeking to take advantage of these programs, absent a more thorough analysis and understanding of the precise manner in which the proposed changes will be implemented and governed. UAE respectfully submits that the proposed tariff changes have not yet received adequate discussion or evaluation, either in DSM Steering Committee meetings or before the Commission in this docket.

Some UAE members have expressed concerns over the rushed nature of the evaluation and proposed implementation of these significant tariff changes, as well as confusion over how the new proposals will be implemented and administered. For example, it is not clear how the proposed “reservation system” is being or will be operated, or how fairness will be ensured. It is also not clear how the maximum “up to” concept will be implemented in a fair and non-discriminatory manner. UAE submits that further explanation and evaluation of these proposals is necessary before they can be determined to be in the public interest.

UAE respectfully submits that the Commission should suspend the effectiveness of the proposed tariff revisions and schedule a technical conference in the near future at which the Commission and its staff, along with other interested parties, can ask questions and explore details of the proposed changes sufficient to enable them to determine whether they are in the public interest. After the technical conference, UAE believes that it and other parties will be in a

reasonable position to determine whether these proposed changes, or other changes, are in the public interest, and whether further proceedings or comments are warranted in this docket.

Respectfully submitted this 29th day of February 2015.

HATCH, JAMES & DODGE

/s/ _____
Gary A. Dodge
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 29th day of February 2016 on the following:

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