

August 19, 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-T11 - In the Matter of Rocky Mountain Power's Proposed Revision to Electric Service Schedule No. 140, Non-Residential Energy Efficiency

Dear Public Service Commission,

On July 1, 2015, the enhanced lighting incentives for small business under Rocky Mountain Power's (the Company) Schedule 140, Non-Residential Energy Efficiency were suspended as the cost for providing the incentives were exceeding the budgeted amount of \$1.78 million. The Company proposed the suspension to allow them to reevaluate the shortfalls in the existing offering and enable them to redesign a more cost-effective program offering for small businesses.

On August 5, 2016 the Company filed its request to reinstate their restructured enhanced small business program in the form of Small Business Direct Install for retrofits. On August 9, 2016, the Commission issued a Notice of Filing and Comment Period asking interested parties to submit their comments on the Company's restructured Small Business Direct Install Program on or before August 19, 2016. Utah Clean Energy (UCE) and Southwest Energy Efficiency Project (SWEEP) are hereby submitting these comments on the Company's proposed modifications to small business program offering.

UCE and SWEEP are supportive of the Company's restructured enhanced incentive offering for small businesses in the form of small business direct installation for retrofits. The revised program is cost-effective with a Utility Cost Test benefit to cost ratio of 1.28. We appreciate the Company's efforts in modifying the program such that it will also provide incentives for qualifying equipments like lighting, plug load, HVACE measures and more. We see a huge market interest in the program and believe that the program will achieve a desired outcome.

As the program will be offered to both rural and urban communities, we recommend that the Company work with as many local contractors as possible. A greater participation from local contractors, especially in the rural communities, will help promote economic development in some of these communities. Finally, we also recommend that the Company provide periodic updates to the DSM Steering Committee on the small business direct install program performance and participation levels.

Sincerely,

Mitalee Gupta
Program and Policy Associate
UTAH CLEAN ENERGY

Howard Geller
Executive Director
SOUTHWEST ENERGY EFFICIENCY PROJECT