

August 26, 2016

***VIA ELECTRONIC FILING
AND HAND DELIVERY***

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

Re: **Reply Comments**
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-T11

On August 9, 2016, the Public Service Commission of Utah ("Commission") issued a Notice of Filing and Comment period in the above referenced matter, allowing parties to file comments by August 19, 2016 and reply comments by August 26, 2016. The Division of Public Utilities ("DPU"), the Office of Consumer Services ("OCS"), Utah Clean Energy ("UCE"), and Southwest Energy Efficiency Project ("SWEEP")¹ filed comments on August 19, 2016. Rocky Mountain Power ("Company") provides these reply comments in response to party comments.

The DPU, OCS, and SWEEP recommended that the Commission approve the proposed modifications to Schedule 140. OCS recommended that the Commission reject the tariff revisions as they are currently filed requesting some additional information be added to the tariff, among other things, as further described below.

OCS requested that the tariff be refiled identifying the location of detailed program information and the timeframe of changes and how they are noticed. Revised tariff sheets, attached hereto as Revised Exhibit A, include OCS' requested information under the General Rules and Provisions section on Sheet 140.3.

OCS also requested that all proposed tariff revisions filed with the Commission for tariffs that defer information to the Company website must contain an exhibit demonstrating what will be posted on the website. The Company is agreeable to providing an exhibit with the aforementioned tariff filings detailing what will be on the website for DSM programs including, but not limited to:

¹ UCE's and SWEEP's comments were filed jointly.

- Program description / explanatory introduction;
- List of, or link to, qualifying equipment; and
- Incentive range and current offered incentive.

Attached hereto is a Revised Exhibit B that includes incentive range information. The title has also been changed from “Frequently Asked Questions” to “Webpage Content” to better reflect what the exhibit is. Actual website changes are not made until after Commission approval. Upon Commission approval of tariff modifications that necessitate webpage changes, the Company will provide link(s) to the DSM Steering Committee of webpages that were modified. The Company will make best efforts to post webpage changes the same day as the approved effective date, with a five (5) business day grace-period. If additional time is needed beyond the grace period for completing webpage changes, the Company will notify the DSM Steering Committee.

OCS also requested that the Company come to an agreement with the DSM Steering Committee regarding how all changes to DSM programs are communicated. The Company will address this topic with the DSM Steering Committee and make best efforts to develop an agreement.

Finally, OCS also requested the Commission suspend the proposed tariff revisions beyond thirty days to allow time to review additional revisions to the tariff. The Company discussed these reply comments and Revised Exhibits A and B with the DPU and OCS. With the additional tariff revisions in Revised Exhibit A, additional content in Revised Exhibit B, and OCS’ other recommendations being adequately addressed in these reply comments, the Company represents that DPU remains supportive of the Company’s filing and OCS is also now supportive of the proposed changes as filed with an effective date of September 5, 2016.

Given that the DPU, UCE, SWEEP, and now OCS are in support of the Company’s proposed revisions, the Company respectfully requests the Commission approve the proposed modifications to Schedule 140 with the originally requested effective date of September 5, 2016.

Informal inquiries regarding this filing may be directed to Michael Snow, DSM Regulatory Affairs Manager, at (801) 220-4214.

Sincerely,



Bill Comeau
Director, Customer Solutions

cc: Division of Public Utilities
Office of Consumer Services
Utah Clean Energy