



We Partner to Build the New Clean Energy Economy

ORIGINAL

dw# 290

November 17, 2016

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

UTAH PUBLIC SERVICE COMMISSION  
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**RE: Docket Number: 16-035-T13 – In the Matter of: Rocky Mountain Power’s Proposed Revisions to Schedule No. 110, New Homes Program and Schedule No. 111, Home Energy Savings Program**

Utah Clean Energy is generally supportive of Rocky Mountain Power’s proposed changes to Schedules 110 and 111. Below are several comments about specific elements of the proposal. We recognize that these comments are being submitted one day after the comment deadline and respectfully request that you consider our comments.

**New Homes Program**

Utah Clean Energy supports combining the New Homes program measures into the combined wattsmart Homes program as a way to improve cost effectiveness and simplify the residential program offerings. We also support the new tiered whole home energy performance measures based on HERS Ratings, which aligns with a new residential energy code compliance method (called the “Energy Rating Index Compliance Option”) that became effective for the state of Utah on July 1, 2016. The specific HERS Rating values proposed by the Company are appropriate as they exceed the energy rating values in the updated residential energy code. To help ensure accuracy of HERS Ratings submitted to the program, we recommend that the new construction program incorporate quality assurance standards developed by RESNET.<sup>1</sup> We also recommend that the new construction program works with realtors and/or sales agents and other new homes professionals to widely publicize the specific HERS Ratings of each home participating in the program. Wide promotion of HERS Ratings will help increase consumer awareness and demand for energy efficient homes. For participating homes that are built for sale, this should include a program requirement to post homes’ HERS Ratings onto the Multiple Listing Services residential listing for the home.

**Evaporative Cooling**

Utah Clean Energy has long supported inclusion of evaporative cooling in Rocky Mountain Power’s wattsmart program due to the large energy savings and cost effectiveness of evaporative cooling technologies. We’re supportive of the many evaporative cooling measures still included in the program, and support the addition of the new multi-family evaporative cooling into the program

<sup>1</sup> RESNET is the body that oversees implementation of HERS Ratings nationally. For example, see: RESNET, Mortgage Industry National Home Energy Rating Systems Standards: <http://bit.ly/2fYY1d4>