

November 29, 2016

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

**RE: Reply Comments: 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 submitting these reply comments in response to Rocky Mountain Power’s reply comments dated November 23, 2016, regarding the abovementioned docket. We appreciate the Commission’s consideration of this additional information.

**Wattsmart Homes HERS Rating and Multiple Listing Service**

Utah Clean Energy believes reporting the energy efficiency rating of new homes in a home’s standard sale documents is a key strategy to help increase consumer awareness of energy efficiency, and will increase consumer demand for energy efficient homes in a similar way that access to fuel-economy ratings for vehicles helps consumers identify the fuel efficiency of vehicles.

In our previous comments, Utah Clean Energy recommended that the HERS rating of a new home that participates in the Company’s wattsmart Homes program should be required to include its HERS rating on the Multiple Listing Service (MLS) forms. Our previous comments neglected to note that the Wasatch Front Regional Multiple Listing Service’s Input Form currently includes a “Home Energy Rating” field (see page 2 of the attached form) that can be ‘checked’ when a home is listed for sale using this form. No changes need to be made to the MLS to accommodate this recommendation. Given that the Wasatch Front Regional Multiple Listing Service is one of the primary MLS systems in Utah (its public website is [www.utahrealestate.com](http://www.utahrealestate.com)), and given that this particular MLS uses a form that includes a field and a “Remarks” section to note a home’s HERS rating, we believe that it is reasonable for the program to require sales agents to complete this field if a participating home is listed for sale on the this MLS.

The “barriers” referenced by the Company regarding MLS sites relate to state legislation proposed during the 2015 General Legislative Session to *require HERS ratings on all new and existing homes*.<sup>1</sup> This proposed bill was met with opposition by the Utah Association of Realtors, who viewed a requirement to make residential energy ratings transparent to consumers as a risk that could make less efficient homes harder to sell. What we’re recommending does not present a risk since it relies on a form already in use today. In fact, our recommendation complements recent efforts made by the Utah Association of Realtors to promote energy efficiency to home buyers and sellers. As a compromise in response to the proposed legislation, the Association recently incorporated new “Energy Efficiency” sections into both its *Buyers Due Diligence Checklist* and *Sellers Property Condition Disclosure* forms (see attached

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<sup>1</sup> House Bill 169 (2015), *Home Energy Rating Index Score Disclosure*, <http://le.utah.gov/~2015/bills/static/HB0169.html>

documents). Therefore, we believe our recommendation is consistent with the industry's current efforts and could be easily implemented.

**Whole-House Ducted Evaporative Cooling**

The additional details presented by the Company in its reply comments about the relative energy savings of premium evaporative coolers and whole-house ducted evaporative coolers is helpful. We recommend that this level of information is presented in future filings.

Thank you for considering these additional comments.

Kevin Emerson  
Energy Efficiency Program Director  
Utah Clean Energy

Cc: Rocky Mountain Power  
Division of Public Utilities  
Office of Consumer Services