



State of Utah
Department of Commerce
Division of Public Utilities

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Lieutenant Governor

ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Energy Section Manager

Brenda Salter, Technical Consultant

Date: March 9, 2017

Re: **RMP Advice No. 17-04, Proposed changes to Schedule 140 – Non-Residential Energy Efficiency**

Docket No. 17-035-T04

RECOMMENDATION

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) approve Rocky Mountain Power's (RMP or Company) proposed changes to the Non-Residential Energy Efficiency Program.

ISSUE

On February 27, 2017, the Company filed modified tariff pages to Utah Tariff Schedule 140 Non-Residential Energy Efficiency Program requesting changes to the program. On February 27, 2017, the Commission issued an Action Request for the Division to investigate the proposed changes to Schedule 140 and report its findings and recommendation to the Commission by March 13, 2017. Subsequently, the Commission issued a Notice of Filing and Comment Period allowing interested parties until March 15, 2017 to provide comments with reply comments due

March 22, 2017. This memorandum represents the Division's response to the Commission's Action Request.

DISCUSSION

The Company is proposing changes to the existing non-residential business program and adding a HVAC Check-up incentive for existing rooftop units. The proposed changes to the mid-market offerings include expanding the lighting incentive offering and adding single package unitary commercial air conditioners. The filing also includes changes to prescriptive HVAC and Food Service measures.

The HVAC Check-up incentive is a new offering designed to encourage customers to maintain existing rooftop systems. A program administrator will work with qualified and approved HVAC maintenance contractors to contact small to medium commercial customers to assess and address the customers HVAC needs. Maintenance contracts will be encouraged along with HVAC system retrofits to increase system efficiency.

The Navigant cost effectiveness analysis for the *wattsmart* business program is provided in Exhibits D, E, and F. The proposed changes to the program are expected to be cost effective at the program level for the Utility Cost Test, Total Resource Cost Test and the Participant Cost Test. The proposed changes align with the November 1, 2016 Budget and Savings Forecast Report numbers.

A review of the proposed tariff pages revealed an error in the "Notes" for Table 14 on page 140.26. The title of the "Note" should read; Notes for HVAC Check-up incentive tables. Prior to finalizing the proposed changes, the Division requests the Company correct this page.

On February 14, 2017, the Company provided a draft copy of the proposed changes to the DSM Steering Committee. The Division reviewed and provided recommendations to the Company on the draft proposal. The Division's recommendations and those of other members of the DSM Steering Committee are included in this filing.

CONCLUSION

As proposed, the non-residential program changes appear to be cost-effective and are consistent with the Commission's goals to promote cost-effective DSM programs. Therefore, the Division recommends that the Commission approve the Company's proposed modifications to Electric Service Schedule 140.

CC Bill Comeau, Rocky Mountain Power
Bob Lively, Rocky Mountain Power
Michele Beck, Office of Consumer Services
Service List