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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: Public Service Commission

From: Office of Consumer Services
Michele Beck, Director
Gavin Mangelson, Utility Analyst

Date: March 15, 2017

Subject: Docket 17-035-T04

In the Matter of: Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Schedule No. 140, Non-residential Energy Efficiency Program

On February 27, 2017 Rocky Mountain Power Company (Company) filed with the Public Service Commission (Commission) an application to make tariff revisions to Schedule 140. The Commission posted a Notice of Filing and Comment Period on March 1, 2017.

The proposed changes to Schedule 140 include the addition of incentives for professional inspection and maintenance of existing rooftop heating, venting, and air conditioning (HVAC) units. The proposal also contains an expansion of the mid-market lighting measures, clarifying changes to the existing HVAC measures, addition of a measure for an Advanced Rooftop Unit Controller¹, and removal of the sunset date that currently applies to certain Food Service Equipment measures. Included in the filing are two exhibits detailing what information will be communicated to customers via the website, and how that information will be presented. These exhibits have been made available as a result of an agreement that was made with the Company after the Office advocated² for this information in docket 16-035-T11, the previous proposal to make revisions to Schedule 140.

¹ Table 3b, Sheet No. 140.11

² Comments filed by the Office on August 19, 2016, Docket No. 16-035-T11

The Company initially discussed the proposed changes with the Steering Committee on February 2, 2017, and a draft version of the proposal was later submitted to the DSM Steering Committee for review and suggestions in advance of the filing.

The Office of Consumer Services (Office) worked with the Company to ensure that the tariff changes be made consistent with incentive cap requirements for other incentives within Schedule 140. In these discussions the Office advocated specifically that the incentives listed in Table 14 contain a cap as a percentage of total measure cost. The proposed tariff Sheet No. 140.26 contains a note with the appropriate language describing this requirement, however, the current version incorrectly labels the note for Mid-Market incentives rather than HVAC check-up incentives. The Office recommends that the note be corrected to specify that it applies to the HVAC check-up incentives.

Regarding the new HVAC check-up measures, it is expected that the maintenance agreement will yield opportunities for customers to become more aware of, and better educated about other energy saving measures that they may choose to adopt. However, in order to ensure that energy savings can be reliably attained from the maintenance measure itself, the measure includes a requirement that the agreement include an annual condenser coil cleaning, and thermostat reprogramming and calibration, services which are expected to produce energy savings. The measure also requires that agreements be at least three years in length, and include two system checks per year. Programmable and Smart Thermostats will also become available for non-residential customers, and are listed along with the HVAC check-up incentives.

The Office agrees that the proposed changes to Schedule 140 are cost effective, should result in energy savings, and will provide increased opportunities for non-residential customers to benefit from energy efficient equipment.

Recommendation

The Office recommends that the Commission take the following action:

1. Require that the note attached to Table 14 HVAC (Sheet No. 140.26) be corrected to apply to HVAC Check-up Incentives.
2. Approve the remaining revisions to Schedule 140.

Copies to: Rocky Mountain Power
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Michael Snow, Manager, DSM Regulatory Affairs

Division of Public Utilities
Chris Parker, Director
Artie Powell, Energy Section Manager