



State of Utah
Department of Commerce
Division of Public Utilities

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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 29, 2017

Re: **RMP Advice No. 17-05, Proposed changes to Schedule 111 – Residential Energy Efficiency**

Docket No. 17-035-T05

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 Residential Energy Efficiency Program (Program), with the condition that the Company file with the Commission notice of any action taken to prevent adverse effects to the Program along with the supporting analysis as soon as practicable.

ISSUE

On March 15, 2017, the Company filed modified tariff pages to Utah Tariff Schedule 111 Residential Energy Efficiency Program requesting changes to the Program. On March 15, 2017, 2017, the Commission issued an Action Request for the Division to investigate the proposed

changes to Schedule 111 and report its findings and recommendation to the Commission by March 30, 2017. Subsequently, the Commission issued a Notice of Filing and Comment Period allowing interested parties until March 31, 2017 to provide comments, with reply comments due April 5, 2017. This memorandum represents the Division's response to the Commission's Action Request.

DISCUSSION

The Company is requesting two changes to the Program. The first is to include in the Customer Participation portion of the tariff the same provision found in the Non-Residential Energy Efficiency Program. This provision would allow the Company to qualify participants to help ensure the effective operation and cost effectiveness of the Program. The Division agrees that if an issue arises that would compromise the Program, it is in the best interest of customers for the Company to take immediate action to rectify those issues. The Company has indicated that if this were to happen it would notify the DSM Steering Committee and take regulatory action if necessary. The Division recommends that the Commission require the Company to file notice of any change to the Program along with the supporting analysis as soon as practicable.

The second requested change is to add a provision where non-lighting measures are capped at up to 70 percent of qualifying costs. The initial cap will be set at 50 percent. The cap will help to ensure that applicants are not receiving incentives at the full qualifying cost. The Division agrees that an applicant should have a personal stake or investment in his/her energy efficiency installations.

On March 6, 2017, the Company provided a draft copy of the proposed changes to the DSM Steering Committee. The Division reviewed and provided initial comments to the Company on the draft proposal.

CONCLUSION

The Division recommends that the Commission approve the Company's proposed modifications to Electric Service Schedule 111 with the condition that the Company file with the Commission

notice of any action taken to prevent adverse effects to the Program along with the supporting analysis as soon as practicable.

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