



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: July 26, 2017

Re: **RMP Advice No. 17-10, Proposed changes to Schedule 140 – Non-Residential Energy Efficiency**

Docket No. 17-035-T09

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 July 10, 2017, the Company filed modified tariff pages to Utah Tariff Schedule 140 Non-Residential Energy Efficiency Program requesting changes to the program. On July 10, 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 July 25, 2017.

Subsequently, the Commission issued a Notice of Filing and Comment Period allowing

interested parties until July 26, 2017 to provide comments with reply comments due August 2, 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 with the focus on lighting controls and lighting retrofits. LED lighting initiatives have evolved from replacement lamps to lighting retrofits that are controllable. While replacement lamps have been a good option, higher savings can be achieved through full fixture replacements. The proposed program will require participants to obtain pre-approval by an approved *wattsmart* Business vendor who will make an assessment and recommend improvements that the customer then has the option to choose to install.

The proposed changes remain cost effective under the proposed "Maximum Incentive" level. The offered incentive will be posted on the Company's website and will be updated with a 45-day notice.

The Company is also proposing to move the TLED and Florescent relamp offerings to a mid-market channel. The increased popularity and availability of the TLED make the proposed change ideal.

The proposed changes align with the November 1, 2016 Budget and Savings Forecast Report numbers.

On June 13, 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.

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
Michael Snow, Rocky Mountain Power
Michele Beck, Office of Consumer Services
Service List