

Utah Clean Energy
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power’s Proposed Tariff Revisions to Electric Service Schedule No. 193, Demand Side Management (DSM) Cost Adjustment	DOCKET NO. 17-035-T13 Comments of Utah Clean Energy and Southwest Energy Efficiency Project
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I. INTRODUCTION

These comments are submitted on behalf of Utah Clean Energy and the Southwest Energy Efficiency Project. We appreciate the opportunity to provide comments on Rocky Mountain Power’s demand side management surcharge reinstatement.

II. DETAILS ABOUT CONCERNS AND SUPPORTING INFORMATION

In this docket the Company is proposing to reinstate the suspended DSM surcharge effective in January 1, 2018 at a 3.66%.

Utah Clean Energy and SWEPP agree that it is in the best interests of ratepayers to align DSM expenditures and revenues and to avoid large over- or under-collection scenarios, such as the projected \$17 million over collection that was estimated for December 2017. However, there is also a benefit to maintaining a reasonable over-collected balance in the DSM account.

Allowing for a reasonable over-collection balance allows the Company to take advantage of new technologies or opportunities to achieve cost-effective energy savings

that may arise in the marketplace. It also enables the Company to respond to additional customer interest in energy efficiency beyond that forecast, should such interest arise, and thereby achieve additional electricity savings without needing to increase the DSM surcharge.

Rocky Mountain Power's proposed DSM surcharge reinstatement brings the balance to close to zero (just \$158,000 over-collected by December 31, 2018). This creates a barrier to the acquisition of all cost-effective energy efficiency where additional cost-effective energy efficiency exceeds the forecasted budget. As proposed, the over-collected balance is so low that if the Company's DSM spending exceeds the budget, an increase to the DSM surcharge would be required. Maintaining a modest over-collection in the DSM collection account is preferable to increasing the DSM surcharge to resolve an under-collection scenario.

We recommend that the Commission approve a reinstatement of Rocky Mountain Power's DSM surcharge at a level that reduces the over-collected balance but preserves a modest over-collection balance to allow for DSM program growth without frequent changes to the surcharge amount.

At this time we do not have analysis to substantiate a specific reinstatement collection rate percentage, as we had been waiting for Rocky Mountain Power to share several different percentage scenarios with stakeholders as the Company agreed to at the October 26, 2017 DSM Steering Committee meeting. These scenarios were not shared in advance of the Company's filing with the Commission. While we don't have specific analysis, we believe that the surcharge should be moderately higher, perhaps 3.7%.

We request that the Commission approve the reinstatement of Rocky Mountain Power's DSM surcharge at a percentage slightly higher than what the Company has proposed in order to allow flexibility for DSM program growth.

RESPECTFULLY SUBMITTED,

Utah Clean Energy

/s/ Kevin Emerson_____

Kevin Emerson

Program Director for Utah Clean Energy

CERTIFICATE OF SERVICE

Docket No. 17-035-T13

I hereby certify that a true and correct copy of the foregoing was served by email this 1st of December, 2017, on the following:

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