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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
Cheryl Murray, Utility Analyst
Gavin Mangelson, Utility Analyst

Date: January 8, 2018

Subject: Docket 17-035-T16

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

On December 22, 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 the same day.

The Office has reviewed the tariff filing and discussed the elements of the proposal with the Company. In the Office's evaluation a few errors in the tariff were identified and communicated to the Company. The Office also noted the removal of a percentage cost cap on table 13b of page 140.25. The proposed incentive amount contained within that table is significantly below the 70% incentive cap. However, the Office has requested that the Company reinsert the incentive cap as costs, incentives, and market conditions can and do change. The Office has long advocated for policies which cap measure incentives as a percentage of measure cost, and regardless of the current incentive amount, the presence of the cap in the tariff provides beneficial information and continuity for future stakeholders and policy makers. The Company has offered to replace the incentive cap and to correct the errors identified in the tariff.

The Office supports the other changes proposed for Schedule 140 and the Office recommends that the Commission approve the proposed changes to Schedule 140 provided that Rocky Mountain Power Company make the aforementioned corrections, and the agreed upon change to the incentive cap on table 13b.

Copies to: Rocky Mountain Power
Bill Comeau, Director, Customer Solutions
Michael Snow, Manager, DSM Regulatory Affairs

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