

January 11, 2018

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

Re: **Reply Comments**

In the Matter of Rocky Mountain Power's Proposed Tariff Revisions, Proposing Changes to Electric Service Schedule No. 140, Non-Residential Energy Efficiency Program – Docket No. 17-035-T16

On December 22, 2017, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment period in the above referenced matter, allowing parties to file comments by January 8, 2018 and reply comments by January 12, 2018. The Division of Public Utilities (“DPU”) and the Office of Consumer Services (“OCS”) filed comments January 3, 2018, and January 8, 2018, respectively. Rocky Mountain Power (“Company”) provides these reply comments in response to party comments.

The DPU and OCS both support and recommend that the Commission approve the proposed changes to Schedule 140, pending some minor corrections to the tariff sheets discussed with OCS. Accordingly, attached hereto as Exhibit A are revised tariff sheets with the following corrections:

- Sheet 140.10 – An erroneous note reference was corrected;
- Sheet 140.10 – The addition of a redundant note under Table 3b was rejected; and
- Sheet 140.25 – The removal of the 70 percent incentive cap under Table 13b was rejected.

The corrections identified above address the items discussed in OCS’ comments. Informal inquiries regarding these reply comments may be directed to me at (801) 220-4214.

Sincerely,



Michael S. Snow  
Manager, DSM Regulatory Affairs

cc: Division of Public Utilities  
Office of Consumer Services

# **Exhibit A**

**ELECTRIC SERVICE SCHEDULE NO. 140 - Continued**  
**Table 3b –Other HVAC Incentives**

Equipment Type	Size Category	Sub-Category	Minimum Efficiency Requirement	Incentive "up to"
Evaporative Cooling	All sizes	Direct or Indirect		\$0.06/ CFM
Indirect-Direct Evaporative Cooling (IDEC)	All sizes	--	Applicable system components must exceed minimum efficiencies required by energy code	\$0.15/kWh annual energy savings See Note 2
Chillers	All except chillers intended for backup service only	Serving primarily occupant comfort cooling loads (no more than 20% for process cooling loads)	Must exceed minimum efficiencies required by energy code	\$0.15/kWh annual energy savings See Note 3
365/366 day Programmable or Occupancy-based Thermostat	All sizes in portable classrooms with mechanical cooling	Must be installed in portable classroom unoccupied during summer months	365/366 day thermostatic or occupancy based setback capability	\$150/thermostat
Occupancy Based PTHP/PTAC control	All sizes with no prior occupancy based control		See Note 4	\$50/controller
Evaporative Pre-cooler (Retrofit Only)		For single air-cooled packaged rooftop or matched split system condensers only	Minimum performance efficiency of 75%. Must have enthalpy controls to control pre-cooler operation. Water supply must have chemical or mechanical water treatment.	\$75/ton of attached cooling capacity (See Note 5)
Advanced Rooftop Unit Control	≥ 5 tons and ≤ 10 tons	Must be installed on existing unitary packaged rooftop units (no split-systems), ≥ 5 tons nominal cooling capacity with constant speed supply fans.	Controls must include: - Either a supply fan VFD or multi-speed supply fan motor with controller that meets ventilation and space conditioning needs - Digital, integrated economizer control	\$2,000
	> 10 tons and ≤ 15 tons			\$2,800
	> 15 tons and ≤ 20 tons			\$4,000
	> 20 tons			\$4,500

**Notes for Table 3b**

- Equipment that meets or exceeds the efficiency requirements listed for the equipment category in the above table may qualify for the listed incentive.
- Incentives paid at \$0.15/kWh annual energy savings. IDEC energy savings subject to approval by the Company.
- Incentives paid at \$0.15/kWh annual energy savings. Chiller energy savings subject to approval by the Company.
- Controller units must include an occupancy based control and include the capability to set back the zone temperature during extended unoccupied periods and set up the temperature once the zone is occupied.
- Incentives for Evaporative Pre-coolers are capped at 70 percent of Energy Efficiency Project Costs and incentives will not be available to reduce the Energy Efficiency Project simple payback below one year.
- Energy Efficiency Project Costs are subject to Rocky Mountain Power approval.

**CFM** = Cubic Feet per Minute  
**HVAC** = Heating, Ventilating and Air Conditioning  
**IDEC** = Indirect Direct Evaporative Cooling  
**PTAC** = Packaged Terminal Air Conditioner  
**PTHP** = Packaged Terminal Heat Pump

(Continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Advice No. 17-17

**FILED:** January 11, 2018

**EFFECTIVE:** January 22, 2018

**ELECTRIC SERVICE SCHEDULE NO. 140 – Continued**
**Notes for Table 13a:**

1. Incentives for measures listed in the table above are available at the point of purchase through approved distributors/retailers or via a post-purchase customer application process.
2. Incentives are capped at 70 percent of qualifying equipment costs. Qualifying equipment costs are subject to Company approval.
3. Qualified equipment lists referenced in the above table are posted on the Utah energy efficiency program section of the Company’s website.

A = Arbitrary (standard lamp shape)

PAR = Parabolic Aluminized Reflector

BR = Bulged Reflector

HID = High Intensity Discharge (e.g. high pressure sodium, metal halide)

HO = High Output

MR = Mirrored Reflector

PLC = Pin Lamp Compact Fluorescent

PLL = Pin Lamp Long Compact Fluorescent

TLED = Tubular Light Emitting Diode

W = Watt

**Table 13b – Mid-Market Incentives –HVAC**

Measure	Category	Eligibility Requirements	Customer/Mid-Market Incentive “up to”
Unitary Commercial Air Conditioners	Air-Cooled – Packaged Systems Only	As defined in CEE Commercial Unitary Air-conditioning and Heat Pumps Specification	\$100/Ton

**Notes for Table 13b:**

1. Incentives are capped at 70 percent of qualifying equipment cost. Qualifying equipment costs are subject to Company approval.
2. Qualified equipment lists referenced in the above table are posted on the Utah energy efficiency program section of the Company’s website.
3. Incentives included in the mid-market incentive tables are available through Company-approved retailers/distributors or a customer application process.

**Table 14 – HVAC Check-up Incentives**

Measure	Category	Eligibility Requirements	Incentive “up to”
Maintenance Agreement	3 year maintenance agreement	Maintenance agreements must include a minimum of two system checks per year (heating and cooling seasons), one condenser coil cleaning per year, and a thermostat reprogramming and calibration.	\$75/ RTU
Thermostats	Programmable Thermostat	Replace existing non-programmable thermostat with programmable thermostat with a minimum of 7-day occupied/unoccupied settings.	\$50/Thermostat
	Smart Thermostat	Replace non-programmable thermostat with programmable smart thermostat with a minimum of 7-day occupied/unoccupied settings. Smart thermostats must be Wi-Fi enabled, online dashboard and/or mobile device app, with occupancy sensor enabled.	
Economizer	Economizer Repair	--	\$150/RTU
Refrigerant	Proper Refrigerant Charge	--	\$35/Ton RTU Capacity

**Notes for Table 14:**

1. Incentives are capped at 70 percent of qualifying cost. Qualifying costs are subject to Company approval.

**ELECTRIC SERVICE SCHEDULE NO. 140 - Continued**  
**Table 3b –Other HVAC Incentives**

Equipment Type	Size Category	Sub-Category	Minimum Efficiency Requirement	Incentive "up to"
Evaporative Cooling	All sizes	Direct or Indirect		\$0.06/ CFM
Indirect-Direct Evaporative Cooling (IDEC)	All sizes	--	Applicable system components must exceed minimum efficiencies required by energy code	\$0.15/kWh annual energy savings See Note 2
Chillers	All except chillers intended for backup service only	Serving primarily occupant comfort cooling loads (no more than 20% for process cooling loads)	Must exceed minimum efficiencies required by energy code	\$0.15/kWh annual energy savings See Note 3
365/366 day Programmable or Occupancy-based Thermostat	All sizes in portable classrooms with mechanical cooling	Must be installed in portable classroom unoccupied during summer months	365/366 day thermostatic or occupancy based setback capability	\$150/thermostat
Occupancy Based PTHP/PTAC control	All sizes with no prior occupancy based control		See Note <del>4</del> 5	\$50/controller
Evaporative Pre-cooler (Retrofit Only)		For single air-cooled packaged rooftop or matched split system condensers only	Minimum performance efficiency of 75%. Must have enthalpy controls to control pre-cooler operation. Water supply must have chemical or mechanical water treatment.	\$75/ton of attached cooling capacity (See Note 5)
Advanced Rooftop Unit Control	≥ 5 tons and ≤ 10 tons	Must be installed on existing unitary packaged rooftop units (no split-systems), ≥ 5 tons nominal cooling capacity with constant speed supply fans.	Controls must include: - Either a supply fan VFD or multi-speed supply fan motor with controller that meets ventilation and space conditioning needs - Digital, integrated economizer control	\$2,000
	> 10 tons and ≤ 15 tons			\$2,800
	> 15 tons and ≤ 20 tons			\$4,000
	> 20 tons			\$4,500

**Notes for Table 3b**

- Equipment that meets or exceeds the efficiency requirements listed for the equipment category in the above table may qualify for the listed incentive.
- Incentives paid at \$0.15/kWh annual energy savings. IDEC energy savings subject to approval by the Company.
- Incentives paid at \$0.15/kWh annual energy savings. Chiller energy savings subject to approval by the Company.
- Controller units must include an occupancy based control and include the capability to set back the zone temperature during extended unoccupied periods and set up the temperature once the zone is occupied.
- Incentives for Evaporative Pre-coolers are capped at 70 percent of Energy Efficiency Project Costs and incentives will not be available to reduce the Energy Efficiency Project simple payback below one year.
- Energy Efficiency Project Costs are subject to Rocky Mountain Power approval.
- ~~Evaporative pre-cooler incentives are subject to the project cost cap and the one-year payback cap.~~

CFM = Cubic Feet per Minute  
 HVAC = Heating, Ventilating and Air Conditioning  
 IDEC = Indirect Direct Evaporative Cooling  
 PTAC = Packaged Terminal Air Conditioner

(Continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Advice No. 17-170

**FILED:** ~~July 10~~December 22, 2017January 11, 2018  
**EFFECTIVE:** ~~August 10, 2017~~January 22, 2018



P.S.C.U. No. 50

~~Third~~**Fourth** Revision of Sheet No. 140.10  
Canceling ~~Second~~**Third** Revision of Sheet No. 140.10

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**ELECTRIC SERVICE SCHEDULE NO. 140 - Continued**

PTHP = Packaged Terminal Heat Pump

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Issued by authority of Report and Order of the Public Service Commission of Utah in Advice No. 17-170

**FILED:** ~~July 10, 2017~~ ~~December 22, 2017~~ January 11, 2018

**EFFECTIVE:** ~~August 10, 2017~~ January 22, 2018

**ELECTRIC SERVICE SCHEDULE NO. 140 – Continued**
**13a—Mid-Market Incentives –Lighting (Continued)**

Measure	Category	Eligibility Requirements	Incentive “up to”
LED	Wall Pack Fixture with Occupancy Sensor	LED must be listed on qualified equipment list	\$75/Fixture
Fluorescent	Reduced Wattage T8 Lamp	≤28 W CEE Replacement Lamp	\$0.75/Lamp
	Reduced Wattage T5 HO Lamp	≤51 W T5HO Lamp	\$1/Lamp

**Notes for Table 13a:**

- Incentives for measures listed in the table above are available at the point of purchase through approved distributors/retailers or via a post-purchase customer application process.
- Incentives are capped at 70 percent of qualifying equipment costs. Qualifying equipment costs are subject to Company approval.
3. Qualified equipment lists referenced in the above table are posted on the Utah energy efficiency program section of the Company’s website.

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TLED = Tubular Light Emitting Diode

W = Watt

**Table 13b – Mid-Market Incentives –HVAC**

Measure	Category	Eligibility Requirements	Customer/Mid-Market Incentive “up to”
Unitary Commercial Air Conditioners	Air-Cooled – Packaged Systems Only	As defined in CEE Commercial Unitary Air-conditioning and Heat Pumps Specification	<del>\$100</del> 50/Ton

**Notes for mid-market Table 13b incentive tables:**

- Incentives are capped at 70 percent of qualifying equipment cost. Qualifying equipment costs are subject to Company approval.
- Qualified equipment lists referenced in the above table are posted on the Utah energy efficiency program section of the Company’s website.
- Incentives included in the mid-market incentive tables are available through Company-approved retailers/distributors or a customer application process.

**Table 14 – HVAC Check-up Incentives**

Measure	Category	Eligibility Requirements	Incentive “up to”
Maintenance Agreement	3 year maintenance agreement	Maintenance agreements must include a minimum of two system checks per year (heating and cooling seasons), one condenser coil cleaning per year, and a thermostat reprogramming and calibration.	\$75/ RTU
Thermostats	Programmable Thermostat	Replace existing non-programmable thermostat with programmable thermostat with a minimum of 7-day occupied/unoccupied settings.	\$50/Thermostat
	Smart Thermostat	Replace non-programmable thermostat with programmable smart thermostat with a minimum of 7-day	

**ELECTRIC SERVICE SCHEDULE NO. 140 – Continued**

		occupied/unoccupied settings. Smart thermostats must be Wi-Fi enabled, online dashboard and/or mobile device app, with occupancy sensor enabled.	
Economizer	Economizer Repair	--	\$150/RTU
Refrigerant	Proper Refrigerant Charge	--	\$35/Ton RTU Capacity

**Notes for Table 14:**

1. Incentives are capped at 70 percent of qualifying cost. Qualifying costs are subject to Company approval.



**CERTIFICATE OF SERVICE**

Docket No. 17-035-T16  
Advice 17-17

I hereby certify that on January 11, 2018, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

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