

March 1, 2019

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th 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 to Electric Service Schedule No. 140, Non-Residential Energy Efficiency
Docket No. 19-035-T01

On February 11, 2019, 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 February 25, 2019, and reply comments by March 1, 2019. The Division of Public Utilities (“DPU”), Office of Consumer Services (“OCS”), and Utah Clean Energy (“UCE”) / Southwest Energy Efficiency Project (“SWEEP”) filed comments February 25, 2019. Rocky Mountain Power (the “Company”) provides these reply comments in response to comments filed by the aforementioned parties.

The DPU’s comments recommended approval of the Company’s proposed modifications to Schedule 140, pending the Company provides a revised Tariff Sheet No. 140.11 with the correct Filed date in the footer. Accordingly, attached hereto as Exhibit A is a revised Tariff Sheet No. 140.11 with the Filed date in the footer as March 1, 2019, to coincide with this reply comment filing.

The OCS’ comments recommended approval of the Company’s proposed changes to Schedule 140, with a request that the Company be required to report to the Steering Committee on each alternative DSM project approved by the Company under Schedule 140. The alternative projects referenced in the Company’s advice letter pertain to instances where large customers opt to complete an alternative energy saving project in lieu of the lighting controls requirement for eligibility within the lighting system retrofits offerings. The Company is able to track whenever these instances occur and can provide details to the Steering Committee as appropriate.

UCE/SWEEP’s comments recommended that the Company increase incentives for energy efficiency measures that have discounted participant payback periods of greater than 5 years. The Company would like to clarify that simple payback is the amount of time in which a participating customer’s investment will pay off, whereas the discounted customer payback that UCE/SWEEP referenced from the cost-effectiveness analysis factors in inflation and is not commonly referenced

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by customers as influential in their energy investment decision making process. The simple payback for wattsmart Business offerings are typically less than five years. Notwithstanding, the Company's programs are continually analyzed and reviewed to determine appropriate incentive levels to move the market that are cost-effective. The Company believes incentive levels in the current wattsmart Business portfolio and proposed in this filing are appropriate at this time and in the public interest.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is written in a cursive style with a long, sweeping tail on the "w" and "n".

Michael S. Snow
Manager, DSM Regulatory Affairs

Enclosures

Exhibit A

Proposed Tariff Sheet

ELECTRIC SERVICE SCHEDULE NO. 140 - Continued

Table 4b—Building Envelope Incentives (New Construction/Major Renovation) (Continued)
Table 5 – Food Service Equipment Incentives

Equipment Type	Equipment Category	Minimum Efficiency Requirement	Incentive/Unit “up to”
Residential Dishwasher	Used in a Business	See Home Energy Savings Program	See Note 2
Commercial Dishwasher (High Temperature models w/ electric boosters only)	Undercounter	ENERGY STAR Qualified	\$100
	Stationary Rack, Single Tank, Door Type		\$400
	Single Tank Conveyor		\$1,000
	Multiple Tank Conveyor		\$500
Electric Insulated Holding Cabinet	V ≥ 28 (Full Size)	ENERGY STAR Qualified	\$400 <u>700</u>
	13 ≤ V < 28 (3/4 Size)		\$300
	V < 13 (1/2 Size)		\$200
Electric Steam Cooker	3-, 4-, 5- and 6-pan or larger sizes -Tier 1	ENERGY STAR Qualified	\$130
	3-, 4-, 5- and 6-pan or larger sizes - Tier 2	ENERGY STAR Qualified w/ Heavy Load Efficiency ≥ 68%	\$300
Electric Convection Oven	-Full Size	ENERGY STAR Qualified	\$350 <u>200</u>
Electric Griddle		ENERGY STAR Tier 2 Qualified	\$150
Electric Combination Oven	6-15 pans	ENERGY STAR Qualified	\$1,000
	16-20 pans	ENERGY STAR Qualified	\$275
Electric Commercial Fryer	Tier 1	ENERGY STAR Qualified	\$200
	Tier 2	ENERGY STAR Qualified w/Cooking Efficiency ≥ 85%, Idle Energy Rate ≤ 860 Watts	\$300
Ice Machines (Air-Cooled Only)	Tier 1: Harvest Rate < 500 lbs/day	ENERGY STAR Qualified	\$125
	Tier 1: Harvest Rate ≥ 500 lbs/day		\$150
	Tier 2: Harvest Rate < 500 lbs/day	CEE Tier 2 Qualified	\$250
	Tier 2: Harvest Rate ≥ 500 lbs/day		\$400
Residential Refrigerator	Used in a Business	See Home Energy Savings Program	See Note 2

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Advice No. ~~17-1019-01~~

FILED: ~~July 10, 2017~~ ~~February 9~~ March 1, 2019

EFFECTIVE: ~~August 10, 2017~~ March 11, 2019

ELECTRIC SERVICE SCHEDULE NO. 140 - Continued
Table 5 – Food Service Equipment Incentives

Equipment Type	Equipment Category	Minimum Efficiency Requirement	Incentive/Unit “up to”
Residential Dishwasher	Used in a Business	See Home Energy Savings Program	See Note 2
Commercial Dishwasher (High Temperature models w/ electric boosters only)	Undercounter	ENERGY STAR Qualified	\$100
	Stationary Rack, Single Tank, Door Type		\$400
	Single Tank Conveyor		\$1,000
	Multiple Tank Conveyor		\$500
Electric Insulated Holding Cabinet	$V \geq 28$ (Full Size)	ENERGY STAR Qualified	\$700
	$13 \leq V < 28$ (3/4 Size)		\$300
	$V < 13$ (1/2 Size)		\$200
Electric Steam Cooker	3-, 4-, 5- and 6-pan or larger sizes - Tier 2	ENERGY STAR Qualified w/ Heavy Load Efficiency $\geq 68\%$	\$300
Electric Convection Oven	Full Size	ENERGY STAR Qualified	\$200
Electric Griddle		ENERGY STAR Tier 2 Qualified	\$150
Electric Combination Oven	6-15 pans	ENERGY STAR Qualified	\$1,000
	16-20 pans	ENERGY STAR Qualified	\$275
Ice Machines (Air-Cooled Only)	Tier 1: Harvest Rate < 500 lbs/day	ENERGY STAR Qualified	\$125
	Tier 1: Harvest Rate ≥ 500 lbs/day		\$150
	Tier 2: Harvest Rate < 500 lbs/day	CEE Tier 2 Qualified	\$250
	Tier 2: Harvest Rate ≥ 500 lbs/day		\$400
Residential Refrigerator	Used in a Business	See Home Energy Savings Program	See Note 2

(continued)

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FILED: March 1, 2019

EFFECTIVE: March 11, 2019

CERTIFICATE OF SERVICE

Advice No. 19-01
Docket No. 19-035-T01

I hereby certify that on March 1, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov

Division of Public Utilities

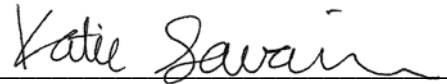
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