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VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84111

Re: Docket No. 19-035-T04—In the Matter of Rocky Mountain Power’s Proposed Tariff Revisions to Electric Service Schedule No. 118, Low Income Weatherization

Utah Clean Energy is submitting these comments in support of Rocky Mountain Power’s (“RMP”) proposed revisions to the Low Income Weatherization Program (“LIW”) filed on March 19, 2019. RMP previously held discussions with the Steering Committee regarding these changes, and at those meetings, Steering Committee members were able to provide feedback and comments on RMP’s proposed changes to Schedule 118. Utah Clean Energy appreciates RMP incorporating this feedback into its proposed changes, in particular the provision allowing inefficient evaporative coolers and window air conditioning units to be replaced with more efficient equipment.

Utah Clean Energy notes that Rocky Mountain Power’s proposed budget and electricity savings for the LIW program in 2019 is 180 MWh and \$75,000, placing RMP’s support for LIW programs among the low range of utility support for LIW across the United States. We find the proposed changes promising because they would increase the electricity savings for this important customer group, but remain concerned about how the level of savings and budget compares to other electric utilities. For example, according to the 2017 Utility Scorecard published by the American Council for an Energy Efficient Economy, across the country, the median amount of spending on LIW as a percentage of total utility DSM spending is 6.23%,

whereas RMP invested only 0.11% of its budget (2015 data).¹ We recognize that there are limiting factors that prevent Utah's Weatherization Assistance Program and implementing agencies from immediately utilizing a larger budget, however, we believe that there may be additional opportunities to increase electric efficiency among LIW participants. Therefore, we strongly recommend that RMP staff work with the Utah Weatherization Assistance Program to continue to identify ways to expand the impact of this important program in the future.

Utah Clean Energy supports the proposed changes to Schedule 118 in this docket and looks forward to working with the Steering Committee and RMP to continue finding cost effective ways of improving the LIW. Thank you for the opportunity to provide comments.

Sincerely,

/s/ Hunter Holman

Hunter Holman
Staff Attorney
Utah Clean Energy

CC: Michael Snow, Rocky Mountain Power
Brenda Salter, Division of Public Utilities
Cheryl Murray, Office of Consumer Services

¹ See Grace Relf, Brendon Baatz, Seth Nowak, American Council for an Energy-Efficient Economy, The 2017 Utility Energy Efficiency Scorecard (June 2017), page 40 found at: <https://aceee.org/research-report/u1707>.