

April 15, 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. 114, Air Conditioner Peak Management Program (Cool Keeper Program)

Docket No. 19-035-T05

On March 22, 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 April 8, 2019, and reply comments by April 15, 2019. The Division of Public Utilities (“DPU”), Office of Consumer Services (“OCS”), and Utah Clean Energy (“UCE”) filed comments April 8, 2019. Rocky Mountain Power (the “Company”) provides these reply comments in response to comments filed by the aforementioned parties.

Utah Clean Energy’s comments were supportive, noting that the proposed changes are an important step in improving the Company’s demand response capabilities and in preparing the grid for higher integration levels of renewable energy sources.

The DPU’s comments recommended approval of the proposed modifications, with further recommendations to require the Company to:

1. Provide the number of events called, the duration of the event, and the date of each event initiated to satisfy the NERC standard for Contingency Reserve Obligations in the DSM Annual Report; and
2. Provide a follow-up report to the DSM Steering Committee of the customer complaints initiated by the Cool Keeper bill credit change.

The OCS’ comments also recommended approval of the proposed modifications, with further recommendations to require the Company to:

1. Report on the number of times the Cool Keeper Program is deployed to meet emergency needs during qualifying events;
2. Track customer complaints received in regard to the monthly bill credit; and
3. Modify the Schedule 114 tariff to include a description of the new monthly credit design.

With respect to the DPU's additional recommendations:

1. The Company would like to clarify that satisfying the NERC standard for Contingency Reserve Obligations does not require an event to be called/dispatched. The added language to the tariff simply clarifies that the Cool Keeper system can be used to help cover reserve obligations, which will reduce the need to use other capacity resources to satisfy NERC. Whenever Cool Keeper is dispatched, whether it is within the dispatch parameters defined in Schedule 114 or outside the dispatch parameters for a system emergency, event details will be provided in the DSM Annual report.
2. The Company agrees to follow-up with the DSM Steering Committee to report on any customer complaints received regarding the Cool Keeper bill credit change.

With respect to the OCS' additional recommendations:

1. The Company agrees to report on the number of times the Cool Keeper Program is deployed due to a system emergency;
2. The Company will track customer complaints received regarding the new monthly bill credit structure; and
3. The Company believes it is unnecessary to include a description of the new monthly bill credit design in the Schedule 114 tariff. A description of the bill credit incentive will be included on the Company's website, where customers generally turn to for information about the Cool Keeper Program. This is consistent with the Company's other DSM programs. Additionally, if the proposed changes are approved, the Company will provide direct notice to all participating customers via email or letter explaining the changes and new bill credit structure.

Sincerely,



Michael S. Snow
Manager, DSM Regulatory Affairs

Enclosures

CERTIFICATE OF SERVICE

Advice No. 19-06
Docket No. 19-035-T05

I hereby certify that on April 15, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

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