



GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

State of Utah  
DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
Director

To: The Public Service Commission of Utah

From: The Office of Consumer Services

Michele Beck, Director  
Alex Ware, Utility Analyst

Date: September 17, 2020

Subject: Docket 20-035-T06

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

## INTRODUCTION

On September 02, 2020, Rocky Mountain Power (RMP) filed Advice No. 20-07 with the Public Service Commission (PSC). This filing proposed revisions to the Electric Service Schedule No. 140 Non-Residential Energy Efficiency Program and associated tariff sheets. On September 2, 2020, the PSC issued an Action Request to the Division of Public Utilities (DPU) to investigate the proposed changes in this filing. On September 3, 2020, the PSC issued a Notice of Filing and Comment Period that set a deadline of September 17, 2020 for parties to file initial comments and September 24, 2020 for reply comments on RMP's proposal.

RMP provided a draft advice letter and associated tariff sheets to the demand-side management (DSM) Steering Committee in early August 2020, as well as met with the committee on August 11, 2020 to receive feedback.

The Office of Consumer Services (OCS) submits these comments to the PSC regarding RMP's proposed changes to Electric Service Schedule No. 140.

## BACKGROUND

In the advice letter on page 5, RMP states that the purpose of this filing is to streamline the Schedule 140 tariff sheets that were originally proposed in Docket No. 13-035-89.

RMP states that since that time, the granularity of information regarding the Non-Residential Energy Efficiency Program offerings listed in the tariff sheets has become a hindrance to being able to quickly adapt to shifts in the market and frequent new technologies and standards. RMP indicates that while some of the granularity in the tariff sheets will be removed, “All requirements, eligibility, and other detailed information necessary for participation will be posted and maintained on the Company’s website, application materials, and other prominent places for transparency and to keep customers informed.” RMP continues that, “Any changes to the granular offering criteria will be managed through the day to day operations of the Company’s energy efficiency portfolio.”

### **ADDITIONAL PROPOSED TARIFF CHANGES**

In addition to the request for a streamlined tariff, RMP also proposes a range of changes to the Non-Residential Energy Efficiency Program offerings that fall under the categories:

- a. Lighting,
- b. Motors,
- c. HVAC Equipment,
- d. Food Service Equipment,
- e. Office Equipment,
- f. Irrigation,
- g. Farm and Dairy Equipment,
- h. Mid-Market Lighting, and
- i. HVAC Check-up measures.

### **COST-EFFECTIVENESS**

Accompanying this filing in Exhibit C is RMP’s cost-effectiveness analysis for its proposed changes to the program. Under the PSC’s preferred Utility Cost Test (UCT), the program is forecasted to remain cost-effective through 2021 with a benefit/cost ratio of 1.96.

### **RECOMMENDATION**

Based on the OCS’s own review of RMP’s tariff filing, as well as a review of the DPU’s response to the PSC’s investigation request (filed September 16, 2020), we recommend the PSC approve the requested tariff and program revisions.

cc:

Jana Saba, Rocky Mountain Power

Artie Powell, Division of Public Utilities