



October 27, 2020

Docket No: 20-035-T09

VIA ELECTRONIC FILING

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

Re: Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Schedule No. 111, Residential Energy Efficiency Program

Utah Clean Energy ("UCE") and Southwest Energy Efficiency Project ("SWEET") are submitting these comments jointly in response to Rocky Mountain Power's proposed tariff revision to electric service schedule No. 111, residential energy efficiency program. UCE and SWEET appreciate the opportunity to provide comment in this docket.

Heat Pump Water Heaters

UCE and SWEET support the proposed incentives for heat pump water heaters (HPWH). As Utah's HPWH market matures, we recommend that Rocky Mountain Power incorporate HPWH units into the program that are compatible with load control devices/programs. This future incentive for controllable HPWHs should be implemented in coordination with Schedule 114. In addition, given the central role that water heater contractors play in promoting, selling, and installing water heaters, UCE and SWEET support increased incentives for contractors who sell HPWHs. Specifically, we recommend increasing the maximum up to incentive to \$1,000 for the non-self install/contractor incentive to more directly incentivize contractors in promoting these units. This higher incentive level is needed to more quickly grow the HPWH market in Utah and is in line with other successful programs. For example, Efficiency Maine offers a \$1,500 incentive for HPWHs and is seeing rapid market transformation in the local HPWH market.¹

Wifi Smart Plug and Light Switch and Smart Home Energy Management System Bundle and Lighting Occupancy Sensor

Plug loads (or "miscellaneous electric loads") represent a large opportunity for electricity savings in homes and commercial buildings.² We support Rocky Mountain Power's proposed Wifi Smart

¹ See: Efficiency Maine, Residential Heat Pump Rebates website, available at: <https://www.energymaine.com/at-home/ductless-heat-pumps/>

² See: U.S. Energy Information Administration, *Analysis and Representation of Miscellaneous Electric Loads in NEMS* (May 2017), available at: <https://www.eia.gov/analysis/studies/demand/miscelectric/pdf/miscelectric.pdf>



Plug and Light Switch incentive, its proposed Smart Home Energy Management System Bundle, as well the proposed Lighting Occupancy Sensor incentive as these programs are needed to reduce plug load electricity consumption.

Further, we recommend that RMP evaluate providing incentives for home energy monitoring devices that provide real-time, appliance-level electricity consumption information to consumers – without using smart plugs and switches. These devices (such as the Sense monitor) are available to consumers today and give consumers real-time electricity consumption info that they can use to find and unplug appliances/devices that are always on, and also adopt energy efficient behaviors in their homes.³ According to two pilot projects by Alliant Energy and Efficiency Vermont (referenced on the Sense website), the Sense monitor was found to reduce electricity consumption in homes by 6%.^{4,5}

Room Air Cleaner

UCE and SWEEP support this proposed measure. With increased time indoors and increased awareness of both indoor and outdoor air quality (including this summer’s record breaking wildfires, which are likely to continue) this incentive is necessary to encourage Utah’s to purchase ENERGY STAR certified room air cleaners.

Heat Pump Clothes Dryer

UCE and SWEEP support this proposed measure in concept. However, we question why the eligibility range for this measure is based on the “Utility Combined Energy Factor” (UCEF) performance rating rather than the standard “Combined Energy Factor.” It appears as though the UCEF range proposed by Rocky Mountain Power comes from the Northwest Energy Efficiency Alliance, which is developing a more accurate way to measure real-world performance of heat pump clothes dryers and so are developing a new metric: the UCEF.⁶ It appears to be a very new performance metric and we request that Rocky Mountain Power clarify if/why the UCEF is a more appropriate performance rating than the CEF performance rating which is the current industry standard.

³ See <https://sense.com/>

⁴ Alliant Energy news release, *New Year’s resolution: add smart power strips or unplug to save money*, available at: <https://www.alliantenergy.com/AlliantEnergyNews/NewsReleases/NewsRelease122619>

⁵ See: *Efficiency Vermont and Sense Conduct Pilot Study of Advanced Home Energy Monitoring*, available at: <https://www.prweb.com/releases/efficiency-vermont-and-sense-conduct-pilot-study-of-advanced-home-energy-monitoring/prweb15646954.htm>

⁶ See: *Energy Efficiency Test Procedure for Residential Clothes Dryers*, available at: <https://neea.org/img/uploads/energy-efficiency-test-procedure-for-residential-clothes-dryers.pdf>



Air source heat pumps

UCE/SWEEP support RMP's proposal to expand the offerings for air source heat pump (ASHP) incentives through Schedule 111. The minimum efficiency requirements proposed are reasonable. We have additional recommendations and comments on these proposed measures.

For the ASHP Upgrade and Conversion measures, we recommend additional bonus incentive when ASHPs are installed in combination with residential energy efficiency building envelope improvements. We recommend that the Commission order the company to evaluate a 10% bonus incentive for ASHPs if building envelope improvements are made at the same time to encourage building envelope improvements.

In addition, while we support the addition of air source heat pumps that Rocky Mountain Power is proposing, there is a major gap in the company's proposal that should be addressed before these incentives take effect: incentives for "cold climate" heat pumps, which are well-suited to provide heating during winter and shoulder seasons in Utah. Cold climate heat pumps are a proven technology, though newer and rarer in Utah's market. Since the technology is not as mature in Utah, UCE and SWEEP recommend that an incentive for cold climate heat pumps should explicitly be included in the tariff and that an incentive of \$4,000 be offered for heat pumps meeting cold climate specifications. We recommend that this apply for the Upgrade, Conversion, and New Construction categories.

Dual fuel heat pumps

We support the concept of providing incentives for a dual fuel heat pump (DFHP) incentive in utility sponsored energy conservation programs. Based on information presented during a Rocky Mountain Power DSM Steering Committee meeting on October 20, 2020, it is our understanding that Rocky Mountain Power is attempting to coordinate with Dominion Energy on this incentive. However, it appears that each utility has not yet fully aligned on certain program details, such as the temperature set points that dictate the temperature when the air source heat pump provides heating and when the natural gas furnace provides heating.

We recommend that the Commission adopt one of two positions into its order on this tariff: 1) reject Rocky Mountain Power's proposed incentive for DFHP and order the company to work with Dominion Energy and other stakeholders to coordinate on the program details and refile the proposal, or 2) approve Rocky Mountain Power's proposed incentive for the dual fuel heat pump incentive but set the implementation date to take effect after RMP has worked with Dominion and stakeholders and submitted a compliance filing to this effect. Ratepayers will benefit when both utilities collaborate closely and utilize identical/very similar program details (such as the setpoint described above) to increase the reliability of energy savings and cost-effectiveness.



Ground source heat pumps

Rocky Mountain Power's advice letter for this tariff proposes to retain an incentive for ground source heat pump conversions for existing homes, which UCE/SWEEP support. We question why the same measure isn't available for new homes. We recommend that in its Order, the Commission require Rocky Mountain Power to add the same ground source heat pump incentive for new homes that is already in place through Schedule 111 for existing homes. If the ground source heat pump incentive is cost-effective for existing homes it is reasonable to assume that the measure would also be cost-effective for new homes, given that it is generally even more cost-effective to incorporate energy technologies into a new home during the time of construction. Utah Clean Energy communicated this request to Rocky Mountain Power in July and then again after the company made this filing to the Commission.

Building Envelope

UCE and SWEEP support the addition of efficient windows and air sealing incentives, insulation, and duct sealing in this filing. These incentives are especially important for customers who are selecting installation of air source heat pumps, as a better insulated and more airtight building will require reduced operation from heating and cooling systems. Improving the building envelope and air sealing in a home can reduce the sizing of the heat pump needed and lower the operating costs of operating a smaller heat pump system. We recommend that the Commission order Rocky Mountain Power to require trade allies who are participating in the air source heat pump incentive to promote these revised building envelope incentives as a package to all customers who participate in the air source heat pump incentives.

Collaboration and cost-sharing

UCE/SWEEP would like to see Rocky Mountain Power build upon the execution of the master inter-utility agreement with Dominion Energy Utah. Ratepayers benefit when both utilities collaborate closely and simplify the application/participation process for their programs. Joint program delivery also helps maintain or increase program cost-effectiveness by leveraging shared administrative costs. For example, Rocky Mountain Power should work with Dominion Energy Utah and stakeholders to develop a single application process for customers to apply for the smart thermostat incentive that is currently available from both utilities.

Other

Finally, as a means to effectively serve all ratepayers UCE/SWEEP recommend that the Commission require Rocky Mountain Power to make all promotional materials for these incentives available in Spanish as well as English.

Sincerely,



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