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DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
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To: The Public Service Commission of Utah  
From: The Office of Consumer Services  
Michele Beck, Director  
Alex Ware, Utility Analyst  
Date: May 19, 2021  
Subject: Docket 21-035-T06: OCS Comments on RMP's Proposed Tariff Revisions  
**In the Matter of:** Rocky Mountain Power's Proposed Tariff Revisions to Electric Service Schedule 111, Energy Efficiency Program

## INTRODUCTION

On May 4, 2021, Rocky Mountain Power (RMP) filed proposed tariff revisions with the Public Service Commission (PSC) regarding its Custom Multi-Family Program (Program) under Schedule 111 Residential Energy Efficiency programs. On April 30, 2021, the PSC issued a Notice of Filing and Comment Period stating interested parties may submit comments and reply comments on RMP's proposed tariff changes by May 19, 2021 and May 26, 2021 respectively. The Office of Consumer Services (OCS) submits these comments to the PSC in response to that notice.

## DISCUSSION

RMP states that the purpose of the filing is to update incentives and incentive structure for the Program to better align with market conditions and maintain cost-effectiveness.

The two proposed changes are:

1. Increase maximum incentive amounts, and
2. Change the flat rate incentive structure to allow for certain measures to be targeted with higher incentives.

RMP explains that since the Program’s inception in 2017, it has offered a flat rate incentive offering for all conservation actions. However, over time the market has widely adopted some cheaper conservation measures such as in lighting, while there is still potential for savings in other costlier yet greater energy savings areas such as HVAC and Windows. Therefore, RMP proposes to shift from a flat rate incentive so that certain measures can be targeted with higher incentives and for the maximum incentive amounts to be increased. RMP provided this Table 2 that shows its new proposed incentive amounts across various measures:

**Table 2 – Proposed Measure Category Incentive Structure**

Measure Category	Market Rate Incentive (\$/kWh)	Low Income Incentive (\$/kWh)
HVAC	\$0.30	\$0.36
Windows	\$0.30	\$0.36
Lighting	\$0.10	\$0.12
Appliances	\$0.175	\$0.21
Building Shell	\$0.175	\$0.21
Domestic Hot Water	\$0.175	\$0.21
Heat Pump Water Heater	\$0.30	\$0.36
New Construction	\$0.20	\$0.24

**COST-EFFECTIVENESS**

RMP reports in this filing that these proposed updates to the tariff have been analyzed by its consultant Guidehouse across three participation levels. Even under the lowest participation level estimated, the utility cost test remains cost-effective.

**RECOMMENDATION**

The OCS recommends that the PSC approve the proposed changes to RMP’s Custom Multi-Family Program under Schedule 111 as they address market changes and the Program will remain cost-effective.

cc: Jana Saba, Rocky Mountain Power

Chris Parker, Division of Public Utilities