



May 19, 2021

**VIA ELECTRONIC FILING**

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

**Re: Docket 21-035-T06 – Rocky Mountain Power’s Proposed Tariff Revisions to Electric Service Schedule no. 111, Residential Energy Efficiency Program**

Utah Clean Energy (UCE) and the Southwest Energy Efficiency Project (SWEEP) appreciate the opportunity to submit these comments in support of Rocky Mountain Power’s (RMP) proposed changes to Schedule No. 111, Residential Energy Efficiency Program. In RMP’s May 4, 2021 filing it proposed to shift the Custom Multifamily Program (Multifamily Program) incentive structure from a flat-rate offering to an offering based on individual measure categories. This change is intended to allow increased incentives for categories with higher costs that also have greater energy savings potential. UCE and SWEEP believe that this change is well tailored to enhance the energy savings from the Multifamily Program while still maintaining strong program cost effectiveness, which is estimated to be 1.24 under the Utility Cost Test. We support the changes proposed in RMP’s application.

UCE and SWEEP would also like to take this opportunity to recommend that RMP and the DSM Steering Committee continue working towards modernizing the Multifamily Program incentive structure. While the proposal in the current application certainly represents an improvement, we believe that additional components could make it even better. For example, pairing the energy efficiency incentives with demand response (DR) programs creates efficiencies during new construction or substantial retrofits of multifamily buildings that make it easier and more cost effective to install DR measures. Potentially offering a bonus incentive for installing multiple measures at once, including enrollment in existing DR measures such as Cool Keeper and the Wattsmart Battery program, could facilitate even greater cost-effective savings. New DR program should also be explored. DR-capable smart thermostats and controllable heat pump water heaters provide an untapped opportunity for substantial demand savings and will almost certainly be more cost effective to install during new construction or substantial retrofits. We recognize that there could be hurdles to installing these DR measures, such as internet reliability, but the potential demand savings from these programs paired with other new construction measures necessitates serious discussion.

Another example is introducing a whole-building energy use intensity (EUI) target into the Multifamily Program. Whole-building energy use targets help facilitate comprehensive energy savings within the building. Incorporating EUI targets into whole-building incentive



programs is an essential step in developing a holistic and integrated design process where architects, engineers, contractors, and owners work together to identify and implement the most cost-effective building efficiency solutions, including trade-offs between disciplines, i.e., enhanced building envelope and smaller, “right-sized” HVAC systems. EUIs are becoming a standard practice in high performance building design and construction. For example, the State of Utah’s High Performance Building Standard recently adopted a new EUI target for State facilities, and the 2021 International Energy Conservation Code, which will soon be considered for adoption by the State of Utah, includes EUI targets in its Appendix CC Zero Energy Commercial Building Provisions. The DSM Steering Committee and RMP should begin the process of incorporating an EUI into Utah’s energy efficiency tariffs. A bonus incentive for multifamily projects that achieve an ambitious EUI target should be considered for future program updates.

UCE and SWEEP recommend that the Commission approve RMP’s proposed changes to the Multifamily Program. We also recommend the DSM Steering Committee and RMP begin discussing how to further modernize Utah’s energy efficiency programs, such as the Multifamily Program, by paring it with demand response measures and folding in an EUI target and bonus incentive. Thank you for the opportunity to provide these comments.

Sincerely,

/s/Kevin Emerson  
Kevin Emerson  
Utah Clean Energy

/s/ Justin Brant  
Justin Brant  
SWEEP

CC: Michael Snow, Rocky Mountain Power  
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