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CHRIS PARKER  
*Division Director*

## Comments

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Brenda Salter, Assistant Director  
Doug Wheelwright, Utility Technical Consultant Supervisor  
Savannah Torman, Utility Analyst  
Arika Abrahamson, Analyst Intern

**Date:** September 4, 2026

**Re:** **Docket No. 26-035-T10, TARIFF** Rocky Mountain Power's Proposed Changes to Schedule No. 140, Non-Residential Energy Efficiency Program.

## Recommendation (Approval)

The Division of Public Utilities (Division) has reviewed the tariff filing and recommends the Public Service Commission (Commission) approve Rocky Mountain Power's (RMP or Company) proposed revision to Schedule 140, Non-Residential Energy Efficiency Program (Program).

## Issue

On August 20, 2026, RMP filed with the Commission proposed tariff revisions to Electric Service Schedule No. 140, Non-Residential Energy Efficiency Program, with a requested effective date of September 21, 2026. On August 20, 2026, the Commission issued an Action Request for the Division to investigate RMP's filing and make recommendations by September 3, 2026. Subsequently, the Commission issued a Notice of Filing and Comment Period, requesting comments by September 8, 2026, with reply comments by September 15, 2026. These are the Division's comments on the proposed revision to Schedule 140.



Division of Public Utilities

Heber M. Wells Building • 160 East 300 South • P.O. Box 146751 Salt Lake City, UT 84114-6741  
[www.dpu.utah.gov](http://www.dpu.utah.gov) • telephone (801) 530-7622 • toll-free in Utah (877) 874-0904 • fax (801) 530-6512

## **Background**

The Non-Residential Energy Efficiency Program is administered through Electric Service Schedule 140 of RMP's Electric Service Tariff. It is intended to maximize the efficient utilization of energy for new and existing non-residential loads by installing energy efficiency measures and energy management protocols. The Schedule 140 tariff was initially proposed in Docket No. 13-035-89 and approved with an effective date of July 1, 2013. At that time, the Company felt it was essential to have more granular information and details on the tariff from a control and risk standpoint, given that the Program was still in its infancy. Over time, achieving energy efficiency and savings cost-effectively and adapting quickly to market conditions became increasingly difficult. In 2020, the Company proposed changes to streamline the Schedule 140 tariff to accommodate necessary flexibility with its offerings. These changes became effective October 2, 2020, with the approval of Docket No. 20-035-T06. The Company continues to monitor market fluctuations and modify the Program as necessary.

## **Discussion**

This filing proposes changes to Schedule No. 140, which will streamline and align rates with targets and current market conditions. The proposed changes are intended to align with targets in the 2026 Budget and Savings Forecast for Wattsmart Business. The proposed adjustments are identified and detailed in various tables in the Advice Letter and in Exhibit A of the filing. The proposed changes will modify or add the following:

1. Extend Express (prescriptive) incentives to integrated exterior lighting and standalone control upgrades.
2. Reduce Flexible (non-prescriptive) Lighting incentives for control-only measures to improve cost-effectiveness and eliminate basic control tiers to incentivize adoption of more advanced lighting controls.
3. Reduce Advanced Lighting Controls incentives to align with cost-effectiveness metrics while maintaining satisfactory participation levels.
4. Consolidate select food service equipment rebates into the Midstream channel.
5. Transition heat pump water heater incentives entirely to the Midstream channel.

6. Add exterior lighting, controls, and standalone control measures to the Small and Medium Business Express program.
7. Expand Midstream incentives to include additional lighting, refrigeration, pumping, commercial water heating, and life science equipment.

On August 4, 2026, the Company shared a draft Advice Letter with the DSM Steering Committee for review and comments. The Company also shared measure-level cost-effectiveness scores with the Division. While not every measure in the program is cost-effective, the Company contends that certain measures are still prudent to include in order to provide a diverse portfolio to customers and achieve overall savings targets.

The Wattsmart Business Program passes each of the benefit/cost tests, besides the Rate Impact Test (RIM), and the proposed changes align with the Program budget and energy saving goals. The Division agrees that the proposed offerings are prudent. The Company's Advice Letter complies with Utah Administrative Code R746-405-2(D), which requires a statement that the tariff sheets do not violate state law or Commission rule.

## **Conclusion**

The Division concludes that RMP's filing is reasonable and appropriate to adjust Schedule No. 140 and enable the Company to update for market conditions. The Division recommends that the Commission approve RMP's revised Tariff Schedule No. 140, filed on August 20, 2026, with an effective date of September 21, 2026.

cc: Michael Snow, RMP  
Michele Beck, OCS