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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

)	Docket No. 05-057-T01
In the Matter of the Approval of the)	
Conservation Enabling Tariff Adjustment)	Utah Clean Energy Demand Side
Option and Accounting Orders)	Management Program Evaluation
)	Comments
)	

Pursuant to the Notice of Request for Filing of Comments issued August 10, 2007, by the Public Service Commission of Utah (Commission) in this docket, Utah Clean Energy (UCE) respectfully submits its comments regarding the Division of Public Utilities' (DPU) proposed Evaluation Plan of Questar Gas Company's (QGCs) Demand Side Management (DSM) Pilot Program.

UCE supports the DPUs proposed evaluation plan¹. As proposed by the Division, the evaluation process would include a First Year Limited Evaluation (FYLE) and an Ongoing Evaluation (OE). UCE supports the Division's plan that the FYLE focus more heavily on process evaluation and data collection, and that the OE focus more heavily on impact evaluation. The Division's plan (Plan) appears to be adequate to facilitate and ensure meaningful and informative program evaluations. Further, UCE asserts that the

¹ Memorandum (*Report and 1st Quarter Review of 2007 QGC DSM programs*), dated July 25, 2007

FYLE should include a comparison of QGC's programs, administration and uptake to that of other natural gas utilities' first-year DSM efforts.

Role of Evaluation Types

First Year Limited Evaluation – Process evaluation is an important aspect of DSM evaluations (especially early in program development). Further, due to the limited amount of quantifiable program activity within the first year timeframe (as compared to subsequent years), the natural gas savings data collected through impact evaluation would be limited and therefore less reliable. In light of this, UCE supports the Division's plan to de-emphasize the role of impact evaluation in the FYLE while focusing on process evaluation and data gathering.

Ongoing Evaluation – The OE as described in the Plan is intended to be a quantitative evaluation to determine if the program is delivering cost-effective energy efficiency and natural gas savings for customers. UCE supports the Division's suggestions that the OE should focus more heavily on M&V of the quantifiable aspects of the program through impact evaluation, using industry-accepted methods of engineering and statistical analysis, and that a comprehensive impact evaluation should encompass program activities from the program launch through the three-year pilot timeframe.² The latter activity will provide more robust results as opposed to carrying out impact evaluation sooner.³ Although impact evaluation will be emphasized under the OE, UCE recognizes the role that process evaluation and data collection will continue to play.

² Division of Public Utilities, Report and 1st Quarter Review of 2007 QGC DSM programs, Docket No. 05-057-T01

³ Presentation by Headman, B., Quantec, *DSM Program Evaluation and Cost Effectiveness*, Questar Gas DSM Advisory Group, April 4, 2007

Through the process of impact evaluation, the OE could attempt to quantify what, if any, market transformation may be taking place as a result of QGC's aggressive public education and marketing campaign, its support of the state's building codes, as well as its partnership with market actors. Market transformation is fundamental to the long term success of natural gas efficiency - making high efficiency measures and practices, and associated cost savings more widespread throughout the marketplace.

RESPECTFULLY SUBMITTED:

August 24, 2007.

Sarah Wright, Director
Utah Clean Energy

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of **UTAH CLEAN ENERGY DEMAND SIDE MANAGEMENT (DSM) PROGRAM EVALUATION COMMENTS** was served upon the following persons on the service list by electronic mail on August 24, 2007.

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I also served the above comments upon the members of the Natural Gas DSM Advisory Group by electronic mail on August 24, 2007.

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