



We Partner to Build the New Clean Energy Economy

To: Utah Public Service Commission (via email and hand delivery)
Cc: DSM Advisory Group (via email)
From: Utah Clean Energy
Date: April 30, 2010
Subject: Docket No. 08-999-05 - Recommendation on Home Energy Reports

While Utah Clean Energy (UCE) supports an extension for Rocky Mountain Power's (Company) final recommendation(s) on Home Energy Reports, as recommended by the Division and ordered by the Commission, UCE disagrees with extending the deadline to February 28, 2011 for a recommendation from the DSM Advisory Group (as required by the Commission's December 17, 2009 Order). We do not believe that investigation and discussions by the DSM Advisory Group as a whole should be constrained the Company's procurement process.

UCE recognizes that the Company is currently evaluating bids for proposals that include Home Energy Reports, which precludes the Company from openly discussing these issues. However, we believe that the DSM Advisory Group would benefit from a full discussion on the concepts related to Home Energy Reports prior to the Company's final evaluation of these bids. UCE does not believe that a recommendation from the DSM Advisory Group must come after the Company's procurement process is completed, as this constraint is a Company issue and not an issue that the DSM Advisory Group as a whole should be bound by. Providing a recommendation prior to the results of the Company's procurement results will allow members of the DSM Advisory Group to be better informed about the issues that may be proposed by the Company.

UCE suggests that a party (or parties) other than the Company should lead the investigation and DSM Advisory Group discussions on the concept, cost, and timing of implementing Home Energy Reports. Input and participation from the Company should be included and incorporated where appropriate subject to the constraints imposed by its current procurement process. For example, the Company could present the summary level inventory about Home Energy Reports referenced in its April 8, 2010 comments to the Commission.

As a member of the DSM Advisory Group, Utah Clean Energy is willing to lead or co-lead such an investigation in order to expedite discussions and a recommendation. We propose holding two technical conferences on this issue, with the goal of presenting a recommendation to the Commission by September 30, 2010. We propose two technical conferences during the months of June and August.

Please direct any questions on this proposal to Kevin Emerson or Sarah Wright at (801) 363-4046.

Respectfully,

A handwritten signature in black ink, appearing to read "Kevin Emerson", is written over a light blue horizontal line.

Kevin Emerson
Sr. Policy and Regulatory Associate