

December 29, 2022

VIA ELECTRONIC FILING

Public Service Commission of Utah
 Heber M. Wells Building, 4th Floor
 160 East 300 South
 Salt Lake City, UT 84114

Attn: Gary Widerburg
 Commission Secretary

RE: Advice No. 22-__
 Proposed Changes to Schedule 140, Non-Residential Energy Efficiency Program
 Docket No. 22-035-__

Enclosed for electronic filing are the proposed tariff sheets associated with Tariff P.S.C.U. No. 50 of PacifiCorp, d.b.a. Rocky Mountain Power (the “Company”), applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405-2(D), the Company states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Company respectfully requests an effective date of February 1, 2023 for these changes.

Second Revision of Sheet No. 140.2	Schedule 140	Non-Residential Energy Efficiency
First Revision of Sheet No. 140.3	Schedule 140	Non-Residential Energy Efficiency
Second Revision of Sheet No. 140.4	Schedule 140	Non-Residential Energy Efficiency
Second Revision of Sheet No. 140.8	Schedule 140	Non-Residential Energy Efficiency
Second Revision of Sheet No. 140.9	Schedule 140	Non-Residential Energy Efficiency

The purpose of this filing is to propose changes to the Non-Residential Energy Efficiency Program (“Program”) administered through Electric Service Schedule No. 140. These tariff changes align with targets illustrated in the table below, filed in the Demand Side Management November 1st Deferred Account and Forecast Report on November 1, 2022, in Docket No.22-035-37.

2023 Budget and Savings Forecast

***	2023 MWh Savings Forecast	2023 Budget Forecast
Wattsmart Business	211,384	\$36,000,000

DESCRIPTION OF CHANGES

Proposed adjustments are listed below, with further explanation provided in subsequent sections. It should be noted that the sections below only include offerings with proposed changes, and any current unchanged offerings are omitted from the tables and sections below.

1. Adjust, discontinue, and add incentives and offerings throughout the Program; and
2. Expand the Market program incentive structure to include market actors.

Table 1a – Lighting System Retrofits

- **Exterior Lighting** – It is proposed to increase the maximum incentive for non-prescriptive exterior lighting to \$0.80.
 - **Networked Controls** – It is proposed to add a new offering for Networked Lighting Controls (NLC) for interior and exterior lighting retrofits. Networked controls serve as an additional solution and option for customers beyond basic controls, enabling the opportunity for networked controls on a circuit or fixture level.
- **Lighting Controls Commissioning** – It is proposed to add a new offering for controls commissioning with a maximum incentive of \$0.17 per Watt (“W”) Controlled. The initially offered incentive amounts will be set at \$0.17 for small and medium businesses, and \$0.15 for large businesses.

Maximum “up to” Incentives for Lighting System Retrofits

Category		Current Maximum “up to” Incentive	Proposed Maximum “up to” Incentive
Exterior Lighting	Non-Prescriptive	\$0.75/W Reduced	\$0.80/W Reduced
Lighting Controls Commissioning		\$0/W Controlled	\$0.17/W Controlled

Offered Incentives for Lighting System Retrofits

Category		Eligibility Requirements	Current Offered Incentive			Proposed Incentive		
			Small	Medium	Large	Small	Medium	Large
Interior (Non-prescriptive)	New Fixtures	No Controls	\$0.60	\$0.40	\$0.40	\$0.66	\$0.66	\$0.60
		Basic Controls	\$0.75	\$0.55	\$0.55	\$0.77	\$0.77	\$0.70
		Area/Circuit Level NLCs	\$0.00	\$0.00	\$0.00	\$1.10	\$1.10	\$1.00
		Fixture Level ANLCs	\$1.30	\$1.10	\$1.10	\$1.32	\$1.32	\$1.20
	Retrofit Kits	No Controls	\$0.30	\$0.30	\$0.30	\$0.66	\$0.66	\$0.60
		Basic Controls	\$0.45	\$0.35	\$0.35	\$0.77	\$0.77	\$0.70
		Area/Circuit Level NLCs	\$0.00	\$0.00	\$0.00	\$1.10	\$1.10	\$1.00
		Fixture Level ANLCs	\$1.00	\$0.90	\$0.90	\$1.32	\$1.32	\$1.20
	Controls Only	Basic Controls	\$0.20	\$0.20	\$0.20	\$0.50	\$0.50	\$0.45
		Area/Circuit Level NLCs	\$0.00	\$0.00	\$0.00	\$0.66	\$0.66	\$0.60
		Fixture Level ANLCs	\$0.80	\$0.80	\$0.80	\$0.83	\$0.83	\$0.75
Exterior (Non-prescriptive)	New Fixtures	No Controls	\$0.35	\$0.25	\$0.25	\$0.39	\$0.39	\$0.35
		Basic Exterior Dimming	\$0.55	\$0.45	\$0.45	\$0.55	\$0.55	\$0.50
		Advanced Networked Dimming	\$0.00	\$0.00	\$0.00	\$0.77	\$0.77	\$0.70
	Retrofit Kits	No Controls	\$0.15	\$0.15	\$0.15	\$0.39	\$0.39	\$0.35
		Basic Exterior Dimming	\$0.40	\$0.35	\$0.35	\$0.55	\$0.55	\$0.50
		Advanced Networked Dimming	\$0.00	\$0.00	\$0.00	\$0.77	\$0.77	\$0.70
	Controls Only	Basic Exterior Dimming	\$0.40	\$0.40	\$0.40	\$0.39	\$0.39	\$0.35
		Advanced Networked Dimming	\$0.00	\$0.00	\$0.00	\$0.66	\$0.66	\$0.60
Lighting Controls Commissioning			\$0.00	\$0.00	\$0.00	\$0.17	\$0.17	\$0.15

Table 1b – New Construction/Major Renovation Lighting Incentives

- **Interior/Exterior Lighting (Major renovation only)** – Interior and exterior lighting incentives for new construction and major renovation were discontinued in March 2022 in favor of the Whole Building New Construction (WBNC) offering. It is proposed to reestablish these offerings for facilities that are only renovating their lighting systems. Facilities that are newly constructed or renovating more than their lighting system can earn incentives through the existing WBNC offer. The maximum and initially offered incentives will be set at the same amounts.

Maximum and Offered Incentives for New Construction/Major Renovation Lighting

Equipment Type	Category	Current Maximum/Offered Incentive	Proposed Maximum/Offered Incentive
Interior Lighting (Major lighting renovation only)	Troffer	\$0.00	\$10/Fixture
	Linear Ambient	\$0.00	\$10/Fixture
	Highbay	\$0.00	\$20/Fixture
	Other (not listed above)	\$0.00	\$0.50/Fixture Wattage
	Advanced Lighting Controls	\$0.00	\$0.80/W controlled
Exterior Lighting (Major lighting renovation only)	Advanced Lighting Controls	\$0.00	\$0.40/W controlled

Table 2 – Motor Incentives

- **Green Motor Rewind** – It is proposed to increase the maximum “up to” incentive to \$2/horsepower (hp), and split the offered incentive between customers and vendors at \$1.00 each.

Maximum “up to” Incentives for Motors

Equipment Type	Current Maximum “up to” Incentive	Proposed Maximum “up to” Incentive
Green Motor Rewinds	\$1/horsepower	\$2/horsepower

Offered Incentives for Motors

Equipment Type	Proposed Incentive	
	Customers	Vendors
Green Motor Rewinds	\$1.00	\$1.00

Table 3a – HVAC Incentives

- **Unitary Commercial Air Conditioners and Heat Pumps** – It is proposed to discontinue and adjust incentives for the equipment sizes specified in the table below due to increased federal standards. Select incentives may be re-instated in the future based on updated standards.

Offered Incentives for HVAC

Equipment Type	Size category	Current Offered Incentive	Proposed Offered Incentive
Unitary Commercial Air Conditioners, Air-Cooled	≥ 65,000 Btu/hr and < 760,000 Btu/hr	\$50/ton	\$0/ton
	< 65,000 Btu/hr (three phase)	\$25/ton	\$0/ton
Unitary Commercial Heat Pumps, Air-Cooled	≥ 65,000 Btu/hr and < 240,000 Btu/hr	\$25/ton	\$50/ton
	≥ 240,000 Btu/hr	\$25/ton	\$0/ton

Table 3b – Other HVAC Incentives

- **Advanced Rooftop Unit Controls** – It is proposed to add a new offering for advanced rooftop control units that are less than five tons to give participants additional options.

Offered Incentives for HVAC Equipment

Equipment Type	Size Parameters	Current Offered Incentive	Proposed Offered Incentive
Advanced Rooftop Unit Control (Retrofit)	< 5 ton	\$0	\$500
Advanced Rooftop Unit Control (New RTU)	< 5 ton	\$0	\$400
Advanced Rooftop Unit Control (DCV Only)	< 5 ton	\$0	\$300

Table 11 – Incentives for Wastewater, Oil and Gas, Fleet Vehicle, and Other Refrigeration Energy Efficiency Measures

- **Engine block heater control** – It is proposed to add a new measure for engine block heater controls, with the maximum and initially offered incentives set at \$150 and \$125, respectively, per controller.

Incentives for Wastewater, Oil and Gas, Fleet Vehicle, and Other Refrigeration Energy Efficiency Measures

Equipment Type	Current Maximum “up to” Incentive	Currently Offered Incentive	Proposed Maximum “up to” Incentive	Proposed Offered Incentive
Engine block heater control	\$0 per controller	\$0 per controller	\$150 per controller	\$125 per controller

Table 13a –Market Incentives Lighting

Currently, the Company’s Mid-Market program, now referred to as the Market program, is structured to only offer incentives to end-use customers. The Company proposes to expand the Market program to a broader structure for prescriptive lamps and fixtures, which will allow the Market program to provide incentives at the most effective point(s) in the supply chain to influence the market.

- **A-Lamps, Decorative Lamps, Downlight Kits, PAR/BR Reflector Lamps** – It is proposed to discontinue these offerings due to federal standards and market adoption.
- **MR-16 Reflector Lamps, Pin-Based Lamps, Linear Replacement Lamps, HID Replacement lamps, Wall Pack Fixtures, Troffer Kit/Fixture, Linear Ambient Kit/Fixture** – It is proposed to adjust offerings under these equipment types to better align with current measure research, market conditions, and the expanded market structure discussed above.

Maximum “up to” Incentives for Market Lighting

Equipment Type	Category	Current Maximum “up to” Incentive	Proposed Maximum “up to” Incentive
LED	A-Lamps	\$10/Lamp	\$0/Lamp
	Decorative Lamps	\$10/Lamp	\$0/Lamp
	Downlight Kits	\$15/Fixture	\$0/Fixture

Offered Incentives for Market Lighting

Measure Category	Equipment	Current Offered Incentive (Per lamp, fixture, kit)		Proposed Incentive (Per lamp, fixture, kit)	
		Distributor	Customer	Distributor	Customer
Reflector Lamps	MR-16 Reflector Lamp	\$0	\$4	\$1.00	\$1.00
Pin-based Lamps	PLC Pin-based Lamp < 10W	\$0	\$4	\$1.25	\$1.25
	PLC Pin-based Lamp ≥ 10W	\$0	\$4	\$2.00	\$2.50
	PLL Lamp	\$0	\$6	\$2.50	\$3.00
Linear Replacement Lamps	TLED Lamp – Type A/B Dual Mode	\$0	\$3	\$1.50	\$2.00
	TLED Lamp – Type A with Driver	\$0	\$3	\$4.00	\$4.00
	TLED Lamp – Type B	\$0	\$3	\$1.50	\$1.50
	TLED Lamp – Type C	\$0	\$3	\$3.50	\$3.50
	TLED Lamp – Type C with available Continuous Dimming	\$0	\$5	\$4.00	\$4.50
HID Replacement Lamps	HID Replacement Lamp < 40 W	\$0	\$10	\$10.00	No Change
	HID Replacement Lamp ≥ 40 W and < 70 W	\$0	\$25	\$12.00	\$12.00
	HID Replacement Lamp ≥ 70 W and < 140 W	\$0	\$35	\$20.00	No Change
	HID Replacement Lamp ≥ 140 W	\$0	\$50	\$30.00	No Change
Wall Pack Fixtures	Wall Pack Fixture > 20 W and < 75 W	\$0	\$20	\$5.00	No Change
	Wall Pack Fixture ≥ 75 W	\$0	\$30	\$5.00	\$25.00
Troffer Kit/Fixture	Troffer Kit	\$0	\$18	\$10.00	No Change
Linear Ambient Kit/Fixture	Linear Ambient Kit	\$0	\$9.50	\$5.00	No Change

Table 13b – Mid-Market Incentives-HVAC

- **Unitary Commercial Air Conditioners** – It is proposed to discontinue/adjust incentives for the equipment sizes specified in the table below due to increased federal standards. Select incentives may be re-instated in the future based on updated standards.

Offered Incentives for Mid-Market HVAC

Equipment Type	Size category	Current Offered Incentive	Proposed Offered Incentive
Unitary Commercial Air Conditioners, Air-Cooled	≥ 65,000 Btu/hr and < 135,000 Btu/hr	\$50/ton	\$0/ton
	≥ 65,000 Btu/hr and < 135,000 Btu/hr	\$100	\$80
	≥ 135,000 Btu/hr ≤ 760,000 Btu/hr	\$50/ton	\$0/ton

Table 14 – HVAC Check-up Incentives

- **Maintenance Agreement** – It is recommended to rename the measure to “RTU Maintenance Agreement” to specify the agreement is for rooftop units only.
- **Chiller Maintenance Agreement** – It is proposed to add a new offering to encourage the regular inspection maintenance of existing chillers. The maximum and initially offered incentives will be set at \$10 and \$5, respectively, per ton.
- **Thermostat** – It is proposed to increase the maximum and offered incentive amounts to \$250 and \$150, respectively, to account for current market prices for eligible thermostats.

Maximum “up to” Incentives for HVAC Check-up

Measure	Current Maximum “up to” Incentive	Proposed Maximum “up to” Incentive
RTU Maintenance Agreement	\$75/RTU	No change
Chiller Maintenance Agreement	\$0/ton	\$10/ton
Thermostat	\$50/Thermostat	\$250/Thermostat

Offered Incentives for HVAC Check-up

Measure	Current Offered Incentive	Proposed Incentive
RTU Maintenance Agreement	\$75/RTU	No change
Chiller Maintenance Agreement	\$0/ton	\$5/ton
Thermostat	\$50/Thermostat	\$150/Thermostat

COST-EFFECTIVENESS

The cost effectiveness analysis for the Wattsmart Business Program, attached hereto as Exhibit B, was based on the maximum “up to” incentive levels. The table below, pulled from Exhibit B, presents the expected cost effectiveness of the Program for 2023 assuming the proposed changes in this filing. Additional details and inputs are included in Exhibit B. Sensitivity analyses are also included as Exhibits C and D. The Program is expected to remain cost effective from the Utility Cost Test perspective under all scenarios.

Cost-Effectiveness Test	Levelized \$/kWh	NPV Costs	NPV Benefits	Net Benefits	Benefit/Cost Ratio
Utility Cost Test (UCT)	0.0318	\$25,376,012	\$44,655,863	\$19,279,851	1.76
Total Resource Cost Test (TRC) No Adder	0.0580	\$46,217,153	\$44,655,863	-\$1,561,290	0.97
Total Resource Cost Test (PTRC) + Conservation Adder	0.0580	\$46,217,153	\$49,121,449	\$2,904,296	1.06
Participant Cost Test (PCT)		\$44,069,059	\$96,860,601	\$52,791,542	2.20
Rate Impact Test (RIM)		\$104,609,169	\$44,655,863	-\$59,953,306	0.43
Lifecycle Revenue Impacts (\$/kWh)					\$0.0003710

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com
michael.snow@pacificorp.com

By regular mail: Data Request Response Center
 PacifiCorp
 825 NE Multnomah Blvd., Suite 2000
 Portland, OR 97232

Informal inquiries regarding this matter may be directed to me at (801) 220-4214.

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Sincerely,

Michael S. Snow
Manager, Regulatory Affairs

Enclosures

cc: Division of Public Utilities
Office of Consumer Services