

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF WYOMING**

IN THE MATTER OF THE AMENDED )  
APPLICATION OF ROCKY MOUNTAIN )  
POWER FOR AUTHORITY TO ESTABLISH A )  
DEMAND SIDE MANAGEMENT PROGRAM ) Docket No. 20000-264-EA-06  
IN WYOMING, ESTABLISHING DSM )  
TARIFFS AND INCREASE RATES TO FUND )  
DSM. )

Intervenor Testimony of

**Howard Geller**

on behalf of

**Southwest Energy Efficiency Project (SWEEP)**

April 25, 2008

1

2 **Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS ADDRESS.**

3 A. My name is Howard Geller. I am the Executive Director of SWEEP, the Southwest  
4 Energy Efficiency Project. My business address is 2260 Baseline Rd. Suite 212,  
5 Boulder, Colorado 80302.

6 **Q. FOR WHOM ARE YOU TESTIFYING?**

7 A. I am testifying on behalf of the Southwest Energy Efficiency Project (SWEEP).

8 **Q. PLEASE DESCRIBE SWEEP.**

9 A. SWEEP is a private not-for-profit organization dedicated to advancing energy  
10 efficiency in six states in the Southwest including Wyoming. SWEEP was established  
11 in 2001. It receives the majority of its funding from charitable foundations and the  
12 Federal government.

13 **Q. WHAT ARE YOUR PROFESSIONAL QUALIFICATIONS?**

14 A. I have 27 years of experience working on energy efficiency policy and program  
15 design, analysis, evaluation and advocacy. Prior to founding SWEEP in 2001, I  
16 served as Executive Director of the American Council for an Energy-Efficient  
17 Economy (ACEEE) in Washington, DC. I have authored or co-authored four books  
18 on energy efficiency and energy policy, and published dozens of reports and articles  
19 on these topics. I have testified previously before the public utility commissions of  
20 Colorado, Illinois, Maryland, Nevada, New Mexico, Utah, and the District of  
21 Columbia. Exhibit HG-1 summarizes my professional qualifications.

22 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

23 A. In my testimony I will comment on DSM program experience in other states in the  
24 region, the demand-side management (DSM) programs proposed by Rocky Mountain

1 Power (RMP) for implementation in Wyoming, and the issues of cost effectiveness  
2 tests, DSM program cost recovery, and how to minimize non-participants.

3 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

4 A. First, I applaud RMP for proposing a robust set of DSM programs that I believe will  
5 benefit households and businesses in Wyoming. I urge the Commission to approve  
6 RMP's request, and do so expeditiously. Second, I recommend that the Commission  
7 direct RMP to maximize the cost-effective energy savings it achieves through its  
8 programs and not limit the budget for the programs. Third, I support use of the Total  
9 Resource Cost (TRC) test as the sole or primary test for determining whether or not a  
10 DSM program is cost effective. Fourth, I urge approval of a broad set of programs  
11 and program elements that will maximize participation in the programs, as way of  
12 minimizing the number of non-participants. Fifth, I support the DSM program cost  
13 recovery mechanism proposed by RMP. Finally, I provide some recommendations for  
14 modifying and enhancing some of the specific DSM programs proposed by RMP.

15 **Q. WHAT IS THE OVERALL STATUS OF ELECTRIC UTILITY DSM**  
16 **PROGRAMS IN THE REGION?**

17 A. Electric utilities in the southwest region (AZ, CO, NM, NV, and UT) have greatly  
18 expanded their DSM programs in recent years. SWEEP estimates that utilities in  
19 these states will spend about \$170 million on DSM programs this year, compared to  
20 spending only \$29 million in 2002.<sup>1</sup> The growth in DSM programs is being driven by  
21 their cost effectiveness compared alternative supply-side resources, the high rates of  
22 demand growth and lack of excess generating capacity in the region, growing concern  
23 about global climate change and greenhouse gas emissions, and adoption of favorable

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<sup>1</sup> See recent presentation by Howard Geller for funding trends by state.  
[http://www.swenergy.org/news/2008-04-MT\\_Workshop-SWEEP%20Presentation.pdf](http://www.swenergy.org/news/2008-04-MT_Workshop-SWEEP%20Presentation.pdf)

1 policies such as attractive DSM program cost recovery procedures or financial  
2 incentives for utility shareholders at the state level.

3 **Q. IS THERE A NEED IN YOUR VIEW FOR RMP'S PROPOSED DSM**  
4 **PROGRAMS IN WYOMING?**

5 A. Yes I believe there is. These programs would help customers reduce their electricity  
6 use and peak power demand at a time when fuel and electricity costs, and the costs  
7 for building new power plants, are rising rapidly. Electricity consumption runs about  
8 29,000 kWh per capita in Wyoming, more than twice the national average of about  
9 12,200 kWh per capita (2006 EIA data).<sup>2</sup> Also, without DSM programs, PacifiCorp is  
10 projecting very high load growth in its Wyoming service area, in particular average  
11 growth in energy use of 5.6% per year during 2007-2016.<sup>3</sup> It is important to help  
12 households and businesses reduce their inefficient use of electricity and thus reduce  
13 their utility bills, especially in a state with high per capita electricity use and high load  
14 growth.

15 **Q. HAS WYOMING GOVERNOR FREUDENTHAL COMMENTED**  
16 **RECENTLY ABOUT THE IMPORTANCE OF ENERGY EFFICIENCY**  
17 **EFFORTS?**

18 A. Yes he has. In his State of the State address given on Feb. 11, 2008, Governor  
19 Freudenthal stated, "We also must have the discipline to recognize that we need to  
20 increase the efficiency of which we use energy. The cost of energy is going to go up  
21 and will continue to rise. There will be some ups and downs, but the cost of energy is  
22 going to go up. We as government elected officials pay the cost. Just as people talk

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<sup>2</sup> This high level of per capita electricity use is due in part to the high amount of industrial electricity use, relative to residential and commercial electricity use, in the state.

<sup>3</sup> See *2007 Integrated Resource Plan*. Portland, OR: PacifiCorp. 2007  
<http://www.pacificorp.com/File/File74765.pdf>

1 about their home heating bills going up, so do the state's and so do the local  
2 government's, and we need to be cognizant that the best way to control those  
3 operating expenses going forward is to be more efficient about the use of energy.”

4 **Q. HAVE YOU REVIEWED THE DSM PROGRAMS PROPOSED BY THE**  
5 **COMPANY AND WHAT IS YOUR OPINION OF THESE PROGRAMS?**

6 A. Yes I have. I am familiar with all of the types of programs proposed by RMP and  
7 have followed their implementation in Utah as well as other states where they have  
8 been implemented; e.g., in Colorado and Nevada. The programs are “tried and true”  
9 DSM programs that have been effective in engaging customers and producing cost-  
10 effective energy savings and peak demand reductions in other jurisdictions including  
11 Utah. I believe there is a very high likelihood the programs will also be successful in  
12 Wyoming and I recommend that all six programs be approved by the Commission.

13 **Q. HOW DOES THE AMOUNT OF MONEY THAT RMP PROPOSES TO**  
14 **SPEND ON DSM PROGRAMS IN WYOMING COMPARE TO THE**  
15 **AMOUNT THAT MAJOR UTILITIES IN NEARBY STATES ARE**  
16 **SPENDING?**

17 A. RMP is proposing to spend about 1% of retail sales revenue on DSM programs in the  
18 first two years but then ramp up to around 2% of revenues in the latter years of its  
19 five-year DSM plan. The latter value is comparable to what other major utilities in the  
20 region are spending or planning to spend on their DSM programs. For example, RMP  
21 is planning to spend about \$33 million or about 2.7% of its 2006 retail sales revenues  
22 on DSM programs in Utah in 2008. In Colorado, Public Service of Colorado (PSCo)  
23 is planning to spend about \$25.5 million (1.2% of 2006 retail sales revenue) on DSM  
24 programs in 2008. But PSCo has proposed ramping up its DSM programs

1 substantially in the next few years, reaching a DSM funding level of \$60-65 million  
2 per year (3% of 2006 retail sales revenue) by 2010. PSCo has determined that it is  
3 cost-effective to do this in the face of rising fuel and power plant construction costs,  
4 and legislation was enacted in Colorado in 2007 that calls for energy savings goals  
5 and expanded utility energy programs.<sup>4</sup> PSCo's DSM proposal is now being  
6 considered in a docket opened by the Colorado PUC.<sup>5</sup> In Nevada, the two investor-  
7 owned utilities (Nevada Power and Sierra Pacific Power) plan to spend \$54 million  
8 (1.8% of 2006 retail sales revenues) on a broad set of DSM programs in 2008.

9 **Q. HOW DOES THE LEVEL OF ENERGY SAVINGS THAT RMP PROPOSES**  
10 **TO ACHIEVE THROUGH ITS DSM PROGRAMS IN WYOMING**  
11 **COMPARE TO THE AMOUNT THAT MAJOR UTILITIES IN NEARBY**  
12 **STATES ARE ACHIEVING?**

13 A. RMP is proposing to ramp up its DSM programs and achieve savings in 2011 equal to  
14 0.48% of retail sales in 2006, savings in 2012 equal to 0.54% of retail sales in 2006,  
15 and savings in 2013 equal to 0.60% of retail sales in 2006. These levels of savings are  
16 somewhat low compared to what other utilities with robust DSM programs in nearby  
17 states are saving or planning to save in the near future. But it is not low by a wide  
18 margin. For example, RMP expects to achieve 161 GWh of first year energy savings  
19 from its 2008 DSM programs in Utah, 0.75% of its retail sales as of 2006. PSCo is  
20 proposing to save about 0.75% of its 2006 sales starting in 2010 and thereafter. And

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<sup>4</sup> House Bill 07-1037. See [http://www.leg.state.co.us/CLICS/CLICS2007A/csl.nsf/fsbillcont3/5EA2048E8A50B21287257251007B8474?Open&file=1037\\_enr.pdf](http://www.leg.state.co.us/CLICS/CLICS2007A/csl.nsf/fsbillcont3/5EA2048E8A50B21287257251007B8474?Open&file=1037_enr.pdf)

<sup>5</sup> See Docket No. 07A-420E before the Public Utilities Commission of Colorado. The testimony submitted in this docket can be viewed at <http://www.dora.state.co.us/puc/DocketsDecisions/HighprofileDockets/07A-420E.htm>

1 the Nevada utilities expect to achieve 260 GWh of first year energy savings from  
2 their DSM programs in 2008, equivalent to about 0.9% of retail sales in 2006.

3 **Q. HOW DOES THE COST EFFECTIVENESS OF THE DSM PROGRAMS**  
4 **THAT RMP PROPOSES TO IMPLEMENT COMPARE TO THE COST**  
5 **EFFECTIVENESS OF DSM PROGRAMS OF MAJOR UTILITIES IN**  
6 **NEARBY STATES?**

7 A. RMP estimates that the proposed DSM programs as a whole will have a benefit-cost  
8 ratio of 1.74 under the Total Resource Cost (TRC) test with no adder for emissions or  
9 other non-energy benefits included (see RMP Exhibit BHK-1). This is comparable to  
10 the cost effectiveness of DSM programs of major utilities in nearby jurisdictions. For  
11 example, a third party evaluation of the DSM programs PSCo implemented during  
12 2001-05 found that the programs had an overall benefit-cost ratio of 1.89 using the  
13 TRC test and provided \$80.6 million in net economic benefits for customers.<sup>6</sup> PSCo  
14 estimates that the expanded DSM effort it has proposed implementing during 2009-  
15 2020 would have a benefit-cost ratio of 1.82.<sup>7</sup>

16 **Q. IN LIGHT OF EXPERIENCE IN NEARBY STATES, DO YOU**  
17 **RECOMMEND ESTABLISHING HIGHER ENERGY SAVINGS GOALS FOR**  
18 **RMP'S DSM PROGRAMS IN WYOMING?**

19 A. There is a need to begin DSM programs in Wyoming, build awareness and interest in  
20 energy efficiency measures, and understand the market barriers to more efficient  
21 electricity use and the best ways to overcome these barriers. Due to these needs, I  
22 recommend accepting the savings targets proposed by RMP at this time. However,

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<sup>6</sup> See *Colorado Demand-Side Management Programs Impact, Cost-Effectiveness, Process and Customer Satisfaction Evaluations*. Final Report prepared by Summit Blue Consulting, LLC for Xcel Energy, March 15, 2006.

<sup>7</sup> See Direct Testimony of Suzanne Doyle in Docket No. 07A-42E, reference 5 above.

1 given the importance of increasing energy efficiency at this point in time, I also  
2 recommend that the Commission direct RMP to maximize the amount of cost-  
3 effective energy savings it achieves through its DSM programs and if feasible exceed  
4 the proposed energy savings targets. Similarly, I recommend that RMP be given  
5 flexibility to exceed the DSM budget levels it has proposed as long the programs  
6 remain cost effective; i.e., I urge the Commission not to establish caps on DSM  
7 spending. RMP should be allowed to meet the demand for energy efficiency services  
8 if it turns out the demand for these services are greater than initially projected. At the  
9 same time, RMP should bear the burden for implementing cost-effective programs  
10 and spending DSM program funds in a prudent manner.

11 **Q. DOES A ROBUST AND WELL-FUNDED SET OF DSM PROGRAMS**  
12 **OFFERED TO ALL CUSTOMER CLASSES ENHANCE EQUITY AMONG**  
13 **CUSTOMERS?**

14 A. Yes it does. A robust and well-funded set of programs means that more customers  
15 will participate and thus benefit directly (as well as benefit indirectly from the  
16 avoided utility system costs), compared to a more limited and modestly funded set of  
17 programs. More program offerings and more efficiency measures within programs  
18 increases the likelihood that an individual customer will be able to find a program or  
19 measure that he/she is able to take advantage of.

20 **Q. IS IT IMPORTANT TO INCLUDE A LOW-INCOME WEATHERIZATION**  
21 **PROGRAM IN THE SET OF DSM PROGRAMS?**

22 A. Yes it is. Low-income households are less likely to participate in other DSM  
23 programs such as rebates for high efficiency appliances or home insulation since low-  
24 income households often lack the financial resources to invest in efficiency measures



1 (even with a utility rebate offered) and often rent rather than own their own home. A  
2 direct installation weatherization program and free distribution of low-cost efficiency  
3 measures such as CFLs and low-flow showerheads is the best way to reach low-  
4 income households and to ensure that this customer class is not underserved by the  
5 DSM programs.

6 **Q. IS IT APPROPRIATE IN YOUR VIEW TO USE THE TOTAL RESOURCE**  
7 **COST (TRC) TEST AS THE PRIMARY TEST FOR DETERMINING**  
8 **WHETHER OR NOT A DSM PROGRAM IS COST EFFECTIVE?**

9 A. Yes it is. A recent authoritative report on DSM program planning and analysis jointly  
10 published by the U.S. Department of Energy and EPA states:

11 The TRC test, which measures the regional net benefits, is the appropriate cost  
12 test from a regulatory perspective. All energy efficiency that passes the TRC will  
13 reduce the total costs of energy in the region. Thus, regulators of most states use  
14 the TRC as the primary cost test for evaluating their energy efficiency programs.

15 The TRC cost test includes only direct costs and benefits, not externalities or non-  
16 monetized factors. Regulators who want to consider these factors in the cost test  
17 can use the SCT [Societal Cost Test], which does include externalities.<sup>8</sup>

18 I recommend that the Wyoming Commission use either the standard TRC test or the  
19 TRC test with an adder to account for environmental and other non-energy benefits,  
20 termed a “Conservation Adder” by RMP, as the primary test for determining whether  
21 or not a proposed DSM program should go forward. All of the programs proposed by  
22 RMP have benefit-cost ratio greater than one using either of these tests, according to

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<sup>8</sup> See National Action Plan for Energy Efficiency. 2007. *Guide to Resource Planning with Energy Efficiency*. Report prepared by Snuller Price et. al., Energy and Environmental Economics, Inc. Nov. [http://www.epa.gov/cleanenergy/documents/resource\\_planning.pdf](http://www.epa.gov/cleanenergy/documents/resource_planning.pdf)

1 the analysis presented by RMP witness Hedman. This is consistent with experience  
2 with similar programs in Utah and other states in the region.

3 **Q. WHAT COST EFFECTIVENESS TEST IS BEING USED AS THE SOLE OR**  
4 **PRIMARY TEST FOR DETERMINING WHETHER OR NOT DSM**  
5 **PROGRAMS ARE COST EFFECTIVE IN OTHER STATES IN THE**  
6 **REGION?**

7 A. Colorado, Utah, Nevada, Arizona, and New Mexico (the other states my organization  
8 works in) all use the standard TRC test or a modified TRC test or Societal Cost test  
9 that includes valuation of emissions or other non-energy benefits, as well as the utility  
10 system benefits.

11 **Q. IN YOUR OPINION, SHOULD RMP'S INVESTMENT IN DSM RESOURCES**  
12 **BE LIMITED BY THE FACT THAT ALL CUSTOMERS WILL PAY FOR**  
13 **THE PROGRAMS BUT NOT ALL CUSTOMERS WILL PARTICIPATE IN**  
14 **THE PROGRAMS?**

15 A. No, I do not believe that the issue of non-participants should limit funding for cost-  
16 effective DSM programs under the TRC or modified TRC test. If DSM is a less costly  
17 resource than supply-side alternatives; i.e., it reduces utility revenue requirements and  
18 the overall cost for energy services for customers as a whole, then it should be  
19 pursued. Every customer pays for utility investments in new power plants or  
20 transmission and distribution infrastructure, whether or not an individual customer  
21 contributes to the need for these new investments. The same principal should be  
22 applied to cost recovery for utility investments in DSM resources. This is standard  
23 practice in DSM program cost recovery around the country.

1 Q. **WHAT IS THE BEST WAY TO ADDRESS THE ISSUE OF NON-**  
2 **PARTICIPANTS IN DSM PROGRAMS?**

3 A. In my view, the best way is to implement a robust, flexible, and well-funded set of  
4 DSM programs that strives for maximum participation over the long run. Residential  
5 programs that include strong promotion of CFLs is one way to maximize participation  
6 (i.e., CFLs are a simple efficiency measure that all or nearly all households can take  
7 advantage of). Commercial and industrial programs that include custom incentive and  
8 self-direction options, as RMP has proposed, are another way to maximize  
9 participation. Also, it is important to recognize that not all customers will participate  
10 every year, but that a majority of customers can participate over time, say over ten or  
11 more years of DSM program activity, thereby minimizing non-participants over the  
12 long run.

13 Q. **DO YOU HAVE COMMENTS ON RMP'S PROPOSAL FOR EXPENSING OF**  
14 **DSM COSTS AND OBTAINING COST RECOVERY ON A**  
15 **CONTEMPORANEOUS BASIS?**

16 A. I support RMP's request to recover DSM program costs concurrently with  
17 expenditures through a DSM rate rider starting in 2009, along with adopting a true-up  
18 mechanism. This proposal is fair to ratepayers and fair to the Company in my view.  
19 Customers will benefit from the utility implementing a broad set of DSM programs,  
20 facilitated in part by this cost recovery policy. Customers will also benefit from not  
21 paying the Company a rate of return as they would if DSM program costs were added  
22 to rate base. The Company will benefit from not having a time lag between DSM  
23 program expenditures and cost recovery. This type of cost recovery policy is in place  
24 in Utah and seems to be working well there.

1 Q. **DO YOU HAVE COMMENTS ON THE DETAILS OF THE PROPOSED**  
2 **HOME ENERGY SAVINGS PROGRAM?**

3 A. Yes I do. First, I recommend that rebates only be provided for ENERGY STAR  
4 certified products in all cases, and that program promotion and marketing be focused  
5 around a “look for the ENERGY STAR” label. ENERGY STAR is the national brand  
6 for energy efficiency and is increasingly recognized by consumers as such. A recent  
7 survey by the U.S. EPA shows that awareness of the ENERGY STAR brand is rising,  
8 and that it is higher in regions with active energy efficiency programs compared to  
9 regions without such programs.<sup>9</sup> The minimum efficiency requirements for products  
10 in this program should be automatically revised whenever ENERGY STAR criteria  
11 change; e.g., the criteria for ENERGY STAR clothes washers will change on July 1,  
12 2009 based on a recent U.S. Department of Energy announcement, and RMP’s  
13 minimum efficiency requirements should change at this time as well. Second, I  
14 recommend only providing rebates for heat pump water heaters and solar water  
15 heaters, not for electric resistance water heaters. Electric resistance water heaters are  
16 not an energy-efficient technology from a primary energy perspective; i.e., an electric  
17 resistance water heater consumes about twice as much energy on a primary basis  
18 (taking into account energy losses in power generation and supply) than a natural gas  
19 or propane-fueled water heater. This recommendation is consistent with the newly  
20 announced criteria for a national ENERGY STAR water heater program.<sup>10</sup> Third, I  
21 recommend that RMP support in-store discounts and promotion for CFLs year-round  
22 and in as many stores as possible, including big box retailers, local hardware stores,

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<sup>9</sup> *National Awareness of ENERGY STAR for 2007*. U.S. Environmental Protection Agency. Washington, DC. April 2008. [http://www.energystar.gov/ia/news/downloads/nat\\_awareness\\_0408.pdf](http://www.energystar.gov/ia/news/downloads/nat_awareness_0408.pdf)

<sup>10</sup> See “U.S. Department of Energy Implements Criteria for ENERGY STAR Water Heaters.” Press release issued by the U.S. Department of Energy, April 1, 2008. <http://www.energy.gov/print/6134.htm>

1 and grocery stores. CFLs are a very cost-effective energy efficiency measure and  
2 maximizing their adoption will increase energy savings and net economic benefits for  
3 customers. Also, as mentioned above, I believe that aggressively promoting CFLs is a  
4 practical and effective way to reduce the level of non-participants in the overall DSM  
5 effort. It is unclear from the program description provided by RMP witness  
6 Bumgarner whether or not discounts for and promotion of CFLs will take place year-  
7 round.

8 **Q. DO YOU HAVE COMMENTS ON THE DETAILS OF THE PROPOSED**  
9 **LOW INCOME HOME WEATHERIZATION PROGRAM?**

10 A. Yes I do. In addition to the weatherization measures and program proposed by RMP,  
11 I recommend that the Company include giving away a large quantity of CFLs to low-  
12 income households through community agencies and public schools in low-income  
13 neighborhoods, and possibly other mechanisms. This type of activity can reach a  
14 large number of households, in contrast to the traditional home weatherization  
15 program that serves a relatively limited number of households each year. A program  
16 like this is being implemented by Public Service Company of New Mexico and has  
17 been proposed for implementation in New Mexico by Southwestern Public Service  
18 Company. Based on the New Mexico programs, I suggest giving away 20,000 CFLs  
19 to low-income households in the first year of RMP's DSM effort in Wyoming at an  
20 additional cost to RMP of about \$100,000 (including administration). Doing so would  
21 ensure that a much greater number of low-income households get some direct benefits  
22 from the DSM programs, not just indirect utility system benefits.

23 **Q. DO YOU HAVE COMMENTS ON THE PROPOSED ENERGY FINANSWER**  
24 **AND FINANSWER EXPRESS PROGRAMS?**

1 A. Yes I do. The programs are modeled on the successful FinAnswer and FinAnswer  
2 Express programs that RMP operates in Utah, programs that recently received an  
3 Exemplary Program award from the American Council for an Energy-Efficient  
4 Economy (ACEEE). The only comment I have is to suggest consideration of a direct  
5 installation component to the programs in the future should small businesses limit  
6 their participation in the proposed rebate programs. Other utilities (e.g., Arizona  
7 Public Service Company) have found it valuable to add a small business direct  
8 installation component to their commercial and industrial programs in order to  
9 achieve significant penetration in this “hard-to-reach” market. A direct installation  
10 program (or program component) provides more complete energy efficiency services  
11 including audits, incentives and installation support, with the utility often covering a  
12 large majority of the cost of efficiency measures, for small businesses.

13 **Q. DO YOU HAVE COMMENTS ON THE PROPOSED SELF DIRECTION**  
14 **PROGRAM?**

15 A. Yes I do. This program is modeled on the successful self direction program that RMP  
16 has implemented in Utah. I support including it in the mix of DSM programs that  
17 RMP implements in Wyoming with the following caveat, namely that I support this  
18 program as long as it is part of a broad suite of DSM programs that all customers pay  
19 for and pay for equally; i.e., without any caps on DSM surcharges for customers big  
20 or small. This is the policy in place in Utah where as noted above RMP’s DSM  
21 programs have a budget in 2008 equivalent to about 2.7% of total retail sales revenue  
22 as of 2006. If large customers are not “paying their fare share” for DSM programs as  
23 a whole, I do not believe they should be offered a self direction opportunity.

1 Q. **DO YOU WISH TO COMMENT ON THE TIMING OF INITIATING DSM**  
2 **PROGRAMS IN WYOMING?**

3 A. Yes. I urge the Wyoming Commission to approve RMP's request to initiate these  
4 programs expeditiously. The sooner the programs begin, the sooner customers will be  
5 able to receive the technical and financial assistance proposed by RMP, and the  
6 sooner customers will reduce their inefficient electricity use and lower their utility  
7 bills. Approving the DSM programs that RMP has proposed would be a major step  
8 towards "becoming more efficient about the use of energy" in Wyoming, as Governor  
9 Freudenthal has called for.

10 Q. **DOES THAT CONCLUDE YOUR TESTIMONY?**

11 A. Yes.

## **Exhibit HG-1**

### **Statement of Qualifications**

#### **Howard Geller**

Dr. Howard S. Geller is the Executive Director of the Southwest Energy Efficiency Project (SWEEP), a public interest venture he founded in 2001. Based in Boulder, Colorado, SWEEP promotes policies and programs to advance energy efficiency in Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming.

Dr. Geller is the former Executive Director of the American Council for an Energy-Efficient Economy (ACEEE). He established ACEEE's Washington, D.C. office in 1981, stepping down as Executive Director in February 2001. He built ACEEE's reputation and influence through technical and policy assessments, advice to policy makers, development of energy efficiency programs, consumer guides, and conferences.

Dr. Geller has advised and conducted energy efficiency studies for utilities, governmental organizations, and international agencies. He has testified before the U.S. Congress on energy issues many times and has influenced energy legislation including the National Appliance Energy Conservation Act of 1987 and the Energy Policy Act of 1992. He has served as an expert witness on energy efficiency and resource planning issues before the utility commissions of Colorado, Illinois, Maryland, and the District of Columbia.

Dr. Geller is author or co-author of four books. His most recent book, *Energy Revolution: Policies for a Sustainable Future*, was published in 2003 by Island Press. In addition to his work in the United States, Dr. Geller has spent over three years working on energy efficiency issues in Brazil. He helped to establish Brazil's National Electricity Conservation Program (PROCEL).

Dr. Geller was awarded the 1998 Leo Szilard Award for Physics in the Public Interest by the American Physical Society in recognition of his contributions to national appliance efficiency standards and more efficient energy use in general. Dr. Geller also received the 2007 Mary Kilmarx award for his work on energy and utility policy from NARUC. Dr. Geller is a member of the editorial advisory board for the journal *Energy Policy*.

Dr. Geller received his PhD in Energy Policy from the University of Sao Paulo in Brazil in 2002. He holds a Masters degree in Mechanical and Aerospace Engineering from Princeton University (1979) and he received a Bachelors degree from Clark University (1977) where he majored in Physics and Science, Technology, and Society.