

June 6, 2023

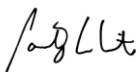
To: Idaho Public Utilities Commission
From: Clean Energy Opportunities for Idaho
Re: AVU-E-23-01 Comments

Clean Energy Opportunities for Idaho (CEO) acknowledges and supports a utility having the opportunity to recover its revenue requirement, yet we request that the Commission give careful thought to protecting the degree of freedom Idaho customers have to control their energy bills. The greater the shift in price signals from volumetric prices to fixed monthly charges, the less agency Idaho customers have to control their energy bills.

- 1) A COSS policy for allocating functionalized costs across *classes* does not dictate how costs should be recovered from each *individual customer*. An individual customer may choose to use more or less electricity than average, thereby *benefiting more or less than average* from shared infrastructure; contributing more or less than average to the cost of shared infrastructure is fair and reasonable.
- 2) To optimize long-term affordability, price signals should encourage customers to make choices which defer future capital investment – cost additions which we customers ultimately pay for. A shift in price signals from volumetric charges to high fixed charges reduces the incentive for customers to conserve, ultimately accelerating the utility’s need for new infrastructure and harming the public interest in long-term affordability. Though the utility benefits from a rate design which leads to greater need for new capital investments, we customers rely on the Commission to protect our interests in long-term affordability and agency over our energy costs.
- 3) CEO asks that the Commission uphold the position stated by PUC staff:
“So long as rates afford the Company an opportunity to recover its revenue requirement, Staff believes that rates may be chosen to achieve other goals, such as energy efficiency, incenting customer behaviors that defer or avoid future plant investment, or allowing customers the ability to control their bills.”¹

The utility’s proposal to shift from volumetric to fixed monthly charges is inconsistent with that position.

Respectfully,



Courtney White
Clean Energy Opportunities for Idaho

¹ PUC Staff comments, IPC-E-18- 16, at 4. <https://puc.idaho.gov/Fileroom/PublicFiles/ELEC/IPC/IPCE1816/Staff/20200121Comments.pdf>

