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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE
APPLICATION OF IDAHO POWER
COMPANY FOR A DETERMINATION
OF 2018 DEMAND-SIDE
MANAGEMENT EXPENCES AS
PRUDENTLY INCURRED

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CASE NO. IPC-E-19-11
IDAHO CONSERVATION LEAGUE
ANSWER TO PETITION FOR
CLARIFICATION

The Idaho Conservation League hereby replies to Idaho Power Company's Petition for Clarification of Order No. 34469. The Idaho PUC Rules of Procedure 31.01.01.325 does not describe an intervenor's ability to reply to a Petition for Clarification. Rule 331 that covers Petitions of Reconsideration provide seven days for cross petitions or answers. IDAPA 310.01.01.331. Idaho Power filed their petition on November 21, 2019. ICL's answer, filed November 27, 2019 is timely pursuant to IDAPA 31.01.01.017.


Idaho Power's petition states: "While it may be implied from final Order No. 34469 ("Order"),¹ Idaho Power petitions for clarification that the Idaho Public Utilities Commission ("Commission") intends for Idaho Power to apply the Utility Cost Test ("UCT") perspective only when evaluating demand-side management ("DSM") resources in integrated resource planning to ensure that it fully understands the Commission's direction."

ICL submits the Commission's Order is clear and there is no need to read any unspoken implication to the decision. The entire docket was about energy conservation programs and not generation resources. ICL never argued to apply the UTC to generation resources because doing so would have been outside of the scope of this docket and, further, doing so doesn't make sense

in the Integrated Resource Planning context. The cost effectiveness tests address whether a standalone program is a prudent use of ratepayer dollars. Integrated Resource Planning compares alternative methods to provide overall utility service to customers. Assessing individual programs and comparing diverse resources are very different questions with distinct processes. Applying the UTC framework to assess energy conservation options in the Integrated Resource Plan process merely means using the costs to the utility as the cost of the resource and using the load shape of the resource to compare against other options. The issue with energy conservation is the appropriate costs to consider when the utility and the customer share the costs. Because Idaho Power only considers generation resource they own or contract with for utility planning the costs to the utility are already clear for generation resources.

In sum: Commission Order 34469 speaks for itself. The entire docket focused on energy conservation programs and not generation sources.

Respectfully submitted this 27th day of November 2019.


Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of November, 2019, I delivered true and correct copies of the foregoing ANSWER TO PETITION FOR CLARIFICATION to the following persons via the method of service noted:

Hand delivery:

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Commission Secretary (Original and seven copies provided)
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