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IDAHO PUBLIC
UTILITIES COMMISSION

JAYME B. SULLIVAN
BOISE CITY ATTORNEY

MARY GRANT (ISB No. 8744)
Deputy City Attorney
BOISE CITY ATTORNEY'S OFFICE
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500
Telephone: (208) 608-7950S
Facsimile: (208) 384-4454
Email: mrgrant@cityofboise.org

Attorney for Intervenor

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR A
DETERMINATION OF 2020 DEMAND-SIDE
MANAGEMENT EXPENSES AS PRUDENTLY
INCURRED

Case No. IPC-E-21-04

**CITY OF BOISE CITY'S
FORMAL COMMENTS**

COMES NOW, the city of Boise City, herein referred to as "Boise City," and pursuant to Rule 202 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.202), and pursuant to that Notice of Modified Procedure, Order No. 35069, filed on June 8, 2021, hereby submits its formal written comments and states as follows:

1. Boise City has an interest in ensuring there is an increase in energy efficiency programs that qualify for funding under Demand-Side Management ("DSM") programs and participation in such programs. This aligns with Boise City's goals of pursuing increased energy efficiency as part of its community-wide goal of 100% clean electricity by 2035.

2. Boise City commends Idaho Power Company ("Company") on their 2020 DSM and energy efficiency savings, achieving the 2nd highest annual savings since the establishment of

the Idaho Energy Efficiency Rider in 2002. This is particularly impressive when considered in the context of the COVID-19 pandemic and its impacts on program offerings and administration.

3. Boise City notes testimony concerning the current negative ending balance of the Idaho Energy Efficiency Rider on December 31, 2020, and supports efforts for appropriate cost recovery. Boise City supports additional review of required adjustments for adequate Idaho Energy Efficiency Rider funding, and that allow the Company to pursue all cost-effective energy efficiency, potentially above the increased Idaho Energy Efficiency Rider percentage authorized in Commission Order No. 34871. (Goralski Testimony at 18).

4. Boise City recommends the Commission direct the Company, in collaboration with the Energy Efficiency Advisory Group (EEAG), to specifically address strategies to increase participation and ensure the benefits of energy efficiency reach residential customers who would have participated in the programs suspended due to COVID-19 (Goralski Testimony at 8). The 348,700 kwh savings reported in the Company's DSM Annual Report Supplement 1: Cost-Effectiveness, for the seven (7) programs suspended due to COVID-19 (Easy Savings, Energy House Calls, Home Energy Audit Program, Multi-Family Energy Savings Program, Shade Tree Project, Weatherization Assistance for Qualified Customers, and Weatherization Solutions) is only 22.6% of the savings achieved by those programs in 2019. While Boise City recognizes the Company's success maintaining an overall cost-effective energy efficiency portfolio during COVID-19, there is an opportunity to achieve increased savings going forward if the waitlists and backlog of demand for suspended residential programs can be efficiently met.

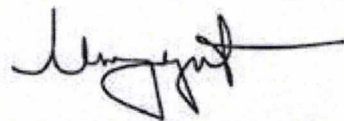
5. Boise City recommends the Company evaluate additional residential energy efficiency measures to better align residential DSM program offerings with the opportunities identified in the 2020 Energy Efficiency Potential Study ("Potential Study"). The achievable

CITY OF BOISE CITY'S FORMAL COMMENTS - 2

energy efficiency potential identified in the Potential Study informed the Company's 2021 Integrated Resource Plan ("IRP") and utilized the utility cost test ("UCT") as the primary measure of cost-effectiveness, as directed in Order No. 34469. Implementing the results of the Potential Study into residential DSM program offerings will ensure future DSM spending aligns with the IRP, fully implementing the UCT in both planning and delivery of energy-efficiency as a least-cost and least-risk resource.

6. Outside of income-eligible weatherization programs, the Company currently offers no incentive for wall cavity or ceiling insulation despite the 1,358 MWh energy saving potential, representing more than 6% of the total energy efficiency potential. (2020 Energy Efficiency Potential Study Table 5-6). Insulation installation, behavioral programs, or other measures would encourage a whole-home approach to energy conservation that empowers customers to take a more active role generating energy savings while maintaining comfort.

DATED this 2nd day of August 2021.



Mary Grant
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 2nd day of August 2021, served the foregoing documents on all parties of counsel as follows:

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702
jan.noriyuki@puc.idaho.gov

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____

Lisa Nordstrom
Idaho Power Company
PO Box 70
Boise, ID 83707
lnordstrom@idahopower.com
dockets@idahopower.com

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____

Connie Aschenbrenner
Idaho Power Company
PO Box 70
Boise, ID 83707
caschenbrenner@idahopower.com

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____

Adam Lowney
McDowell Rackner Gibson PC
419 SW 11th Ave. Suite 400
Portland, OR 97205
adam@mrg-law.com

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____

Peter J. Richardson
Richardson, Adams, PLLC
515 N 27th St.
Boise, ID 83702
peter@richardsonadams.com

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____

Dr. Don Reading
6070 Hill Road
Boise, ID 83703
dreading@mindspring.org

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____

Benjamin J. Otto
Idaho Conservation League
710 N. 6th St.
Boise, ID 83702
botto@idahoconservation.org

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____



Mary Grant
Deputy City Attorney