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IDAHO PUBLIC
UTILITIES COMMISSION

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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR APPROVAL
TO MODIFY ITS DEMAND RESPONSE
PROGRAMS

Case No. IPC-E-21-32

**CITY OF BOISE CITY'S
COMMENTS**

The city of Boise City ("Boise City") submits these formal comments on the application submitted by Idaho Power Company ("Company") for approval of its proposed modifications to its existing demand response programs. Boise City submits these formal comments pursuant to Rule 203 of the Commission's Rules of Procedure, IDAPA 31.01.01.203, and pursuant to the Notice of Modified Procedure, Order No. 35266, issued by the Commission on December 21, 2021.

1. Boise City commends the Company on continuing to develop, implement, and evaluate demand response (DR) programs, particularly with the customer outreach and engagement challenges faced during the COVID-19 pandemic. Boise City recognizes the unique and important benefits that DR delivers to all customers and supports the continuation of


robust, accessible, and cost-effective DR measures. Boise City is encouraged by the Company's efforts to align DR with the Company's highest-risk hours, informed by the 2021 Integrated Resource Plan. Application at 6. Boise City also commends the Company and other parties involved in negotiating the terms of the settlement agreement approved by Commission Order No. 32923 in 2013, as continued program operation has facilitated this robust demand side resource significantly contributing to meeting growing system capacity resource needs.

2. While Boise City recognizes and agrees with the Company's analysis of the need to align the DR program with the highest-risk hours identified in the IRP to ensure effectiveness utilizing the ELCC method, Boise City is concerned that the proposed updated program design may limit Irrigation Peak Rewards program participation, despite the higher monthly fixed incentive and variable incentive. Boise City recommends the Company continue to work directly with current and past Irrigation Peak Rewards participants to understand how to make the program as attractive and easy to participate in as possible while continuing to cost-effectively provide DR capacity during critical peak hours.
3. Boise City supports the Company's proposed removal of DR program marketing limitations. Application at 13. With this limitation lifted, Boise City recommends Idaho Power work with EEAG to intentionally market the A/C Cool Credit program to high-energy burden households, multi-family housing, customers who recently received bill payment assistance, and other customers who would more significantly benefit from the financial benefits of program participation. Additionally, Boise City recommends Idaho Power evaluate marketing strategies that would help further align DR program

participation with locations within the Company's service territory that face capacity constraints due to recent growth or additional infrastructure needs.

4. Boise City recommends Idaho Power identify and evaluate opportunities to leverage smart thermostats installed through the Company's residential heating and cooling efficiency program as a future strategy to expand DR program participation and capacity without deploying additional load control devices. The American Council for an Energy-Efficient Economy's 2019 report "Integrated Energy Efficiency and Demand Response Programs" identified both administrative and program cost savings opportunities as well as increased overall program satisfaction by pursuing an integrated approach to energy efficiency and demand response through an enabling technology like a smart thermostat. DAN YORK, GRACE REIF & CORRI WATERS, AMERICAN COUNCIL FOR AN ENERGY EFFICIENT ECONOMY, INTEGRATED ENERGY EFFICIENCY AND DEMAND RESPONSE PROGRAMS, p. 6, *available at* <https://www.aceee.org/sites/default/files/publications/researchreports/u1906.pdf> (last visited February 1, 2022).
5. Boise City recommends the Commission approve the Company's proposed modifications to the DR programs to be implemented in the 2022 program season.

DATED this 7th day of February 2022.



Ed Jewell
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 7th day of February 2022, served the foregoing documents on all parties of counsel as follows:

<p>Jan Noriyuki Commission Secretary Idaho Public Utilities Commission PO Box 83720 Boise, ID 83720-0074 jan.noriyuki@puc.idaho.gov</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic Means w/ Consent <input type="checkbox"/> Other: _____</p>
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<p>Riley Newton Deputy Attorney General Idaho Public Utilities Commission 11331 W. Chinden Blvd., Bldg No. 8 Suite 201-A (83714) PO Box 83720 Boise, ID 83720-0074 riley.newton@puc.idaho.gov</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic Means w/ Consent <input type="checkbox"/> Other: _____</p>
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