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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION TO EXPAND
OPTIONAL CUSTOMER CLEAN ENERGY
OFFERINGS THROUGH THE CLEAN
ENERGY YOUR WAY PROGRAM

Case No. IPC-E-21-40

**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 authority to expand and implement optional customer clean energy offerings through the proposed Clean Energy Your Way program. 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. 35338, issued by the Commission on March 9, 2022.

1. Boise City recommends the Commission approve the Company's application and authorize the Company to (1) rename Schedule 62 "Clean Energy Your Way Program," and (2) maintain and expand procurement options for renewable energy certificates (RECs)

under Clean Energy Your Way – Flexible, and (3) establish a regulatory framework for Clean Energy Your Way – Subscription that is available to all customers, and (4) offer the Clean Energy Your Way – Construction option for Special Contract and Schedule 19 customers, and (5) procure resources to meet customer’s clean energy preferences through these offerings outside of the current competitive bidding requirements. Boise City commends the Company on its responsiveness to customer clean energy needs, identifying opportunities for all customers to participate in the clean energy transition, and collaboration with interested customers while developing potential offerings.

2. Boise City believes the Clean Energy Your Way – Subscription and Construction programs are designed in a way that mitigates any harmful cost shifting to non-participating customers while allowing customers with expressed clean energy preferences or corporate commitments to procure clean energy. Additionally, Boise City believes the proposed revisions to Schedule 62 would positively impact the Company’s identified clean energy procurement needs. Boise City supports the Company’s proposed process requiring each Clean Energy Your Way - Construction arrangement to be individually designed, within the broader framework, to meet the customer’s needs while holding non-participating customers harmless and to be individually presented to the Commission for approval. Williams, Di. at 49-50.

3. Recognizing this is only Phase I of authorization for the Clean Energy Your Way – Subscription offering, Boise City recommends the Company work to structure the program management and staffing requirements to minimize administration and marketing expenses while continuing to identify clean energy resource(s) for the initial offering. While Boise City anticipates more than sufficient interest in the initial Clean Energy Your Way -


Subscription offering, reasonable pricing that fairly compensates customers for the capacity and energy benefits their participation provides all Idaho Power customers will be critical to the program's success. Additionally, Boise City recommends the Company identify and propose a mechanism that makes Clean Energy Your Way – Subscription participation feasible for customers with low incomes, with specific attention to customers eligible for the Low-Income Home Energy Assistance or Weatherization Assistance Programs, in the Company's Phase II request to the Commission.

4. For both the proposed Clean Energy Your Way – Subscription and – Construction offerings, the Company seeks relief from the established competitive bidding requirements for resource procurement. Application at 16-17. Boise City supports this specific request and recommends the Commission exempt resources procured for these voluntary programs from the current requirements under Commission Order No. 32745 that follow Oregon Public Utility Commission resource procurement rules. Boise City believes this limited exemption is appropriate because the costs of the resources will be individually and voluntarily accepted by participating customers in both the Subscription and Construction offerings and because the Company commits to make a showing to the Commission that the Subscription program resource was competitively procured in Phase II of the Clean Energy Your Way – Subscription approval process. Williams, Di. at 36.
5. As a customer with expressed time-bound clean energy preferences, and in recognition of the range of aggressive clean energy commitments from corporate energy buyers in the City of Boise and across the Company's service area, Boise City recommends the Company move as expeditiously as possible to procure resources to meet customer needs, present Clean Energy Your Way – Construction arrangements to the Commission, and

continue to work collaboratively with stakeholders throughout the development and filing of Phase II of the Clean Energy Your Way – Subscription offering to ensure the proposed programs in this application are maximumly impactful.

6. In conclusion, Boise City commends the Company on its responsiveness to customer feedback on existing clean energy options and the development of a new voluntary program that promotes additionality, affordability, and system benefit. Boise City recommends the Commission approve the Company’s application to expand optional customer clean energy offerings and establish Clean Energy Your Way. Boise City looks forward to working with the Company and stakeholders on program implementation.

DATED this 12th day of May 2022.



Ed Jewell,
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CERTIFICATE OF SERVICE

I hereby certify that I have on this 12th day of May 2022, served the foregoing documents on all parties of counsel as follows:

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