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IDAHO PUBLIC
UTILITIES COMMISSION



LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

August 24, 2022

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Boulevard
Building 8, Suite 201-A
Boise, Idaho 83714

Re: Case No. IPC-E-22-08
In the Matter of the Application of Idaho Power Company for a Determination
of 2021 Demand-Side Management Expenses as Prudently Incurred

Dear Ms. Noriyuki:

Attached for electronic filing is Idaho Power Company's Reply Comments in the
above-entitled matter.

If you have any questions about the attached documents, please do not hesitate
to contact me.

Very truly yours,

A handwritten signature in black ink that reads "Lisa D. Nordstrom".

Lisa D. Nordstrom

LDN:sg
Enclosures

LISA D. NORDSTROM (ISB No. 5733)
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, Idaho 83707
Telephone: (208) 388-5825
Facsimile: (208) 388-6936
lnordstrom@idahopower.com

Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF IDAHO POWER COMPANY FOR A)	CASE NO. IPC-E-22-08
DETERMINATION OF 2021 DEMAND-SIDE)	
MANAGEMENT EXPENSES AS)	IDAHO POWER COMPANY'S
PRUDENTLY INCURRED.)	REPLY COMMENTS
_____)	

Idaho Power Company (“Idaho Power” or “Company”) respectfully submits the following Reply Comments in response to Comments filed by the Idaho Public Utilities Commission (“Commission”) Staff (“Staff”) on August 3, 2022, and the City of Boise City (“Boise City”) on August 2, 2022.

I. REPLY COMMENTS

In its Comments, Staff concludes the Company’s programs are generally well managed and recommends the Commission approve \$35,054,668 in DSM-related expenditures including \$27,921,690 in Idaho Energy Efficiency Tariff Rider expenses (which includes an adjustment of \$650 to reflect the exclusion of a duplicate sales tax expense) and \$7,132,978 in Demand Response (“DR”) program incentives. In their Comments, Boise City also indicates a positive view of Idaho Power’s 2021 Demand-Side

Management (“DSM”) achievements, signals support for an increase in the Idaho Energy Efficiency Rider (“Rider”) percentage, and addresses several other recommendations to be explored with the Energy Efficiency Advisory Group (“EEAG”). In these Reply Comments, the Company briefly responds to issues and recommendations raised by Staff and Boise City.

A. DSM Program Management

Both Staff and Boise City acknowledge Idaho Power continues to make improvements and adjustments to its DSM portfolio. The Company is committed to continuing to work with EEAG to identify potential cost-effective energy efficiency and DR program improvements and offerings. These EEAG discussions will be informed by current energy efficiency program operations, the Company’s energy efficiency Potential Study, the Integrated Resource Plan analysis, the DR Potential Study, and the Company’s annual cost-effectiveness review.

The Company appreciates Staff’s comments concerning cost assignment between educational and marketing efforts, and direct energy efficiency measures, specifically with regard to the Welcome Kits measure “where the intent of the kits is to educate and market.”¹ In their comments, Staff suggests that “the Company provided sufficient evidence that Welcome Kits often lead new Idaho Power customers to pursue other EE programs” and encouraged the Company to reduce costs for the kits where possible and focus the intent of the program on marketing and education.² Idaho Power believes the Welcome Kits component of the Educational Distributions program is a valuable tool in educating and promoting energy efficiency across its service area. The Company appreciates Staff’s comments and will continue to consult with EEAG to identify ways to

¹ Staff Comments at 8.

² *Id.* at 8.

reduce costs for the Welcome Kits, as well as to explore ways to improve the measure to focus on marketing and education.

B. Energy Efficiency Rider Balance

Idaho Power appreciates Boise City's support for appropriate cost recovery of the current under-collected Rider balance and support for a Rider percentage increase over the current 3.10 percent approved in Order No. 34871. The Company notes that the under-collected Rider balance has improved as DSM related expenses declined in 2021 as compared to 2020 due to the decrease in the number of Commercial & Industrial Custom Projects, prolonged suspension of on-site work for several programs related to COVID-19, and supply chain disruptions impacting labor and materials needed for timely project completion for various programs. While Idaho Power does not have a filing planned to modify the Rider collection at this time, it will continue to monitor the balance and stands by its commitment to pursuing all cost-effective energy efficiency regardless of the Rider balance as expressed in previous cases and stakeholder discussions.³

II. CONCLUSION

Idaho Power appreciates the ongoing collaboration with Staff, EEAG, and interested stakeholders to continually improve its energy efficiency offerings. The Company respectfully requests that the Commission issue an Order finding Idaho Power's expenditures of \$27,921,690 in Rider funds and \$7,132,978 of demand response program incentives, for a total of \$35,054,668 as prudently incurred DSM expenses.

³ *In the Matter of Idaho Power Company's Application for Authority to Revise the Energy Efficiency Rider, Tariff Schedule 91, Case No. IPC-E-20-33, Reply Comments, p. 1-2.*

DATED at Boise, Idaho, this 24th day of August 2022.

Lisa D. Nordstrom

LISA D. NORDSTROM
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24th day of August 2022, I served a true and correct copy of Idaho Power Company's Reply Comments upon the following named parties by the method indicated below, and addressed to the following:

<p>Commission Staff 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</p>	<p><input type="checkbox"/> Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> FAX <input type="checkbox"/> FTP Site <input checked="" type="checkbox"/> Email: Riley.Newton@puc.idaho.gov</p>
<p>City of Boise Ed Jewell Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, Idaho 83701-0500</p>	<p><input type="checkbox"/> Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> FAX <input type="checkbox"/> FTP Site <input checked="" type="checkbox"/> Email: ejewell@cityofboise.org BoiseCityAttorney@cityofboise.org</p>
<p>Wil Gehl Energy Program Manager Boise City Dept. of Public Works 150 N. Capitol Blvd. P.O. Box 500 Boise, Idaho 83701-0500</p>	<p><input type="checkbox"/> Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> FAX <input type="checkbox"/> FTP Site <input checked="" type="checkbox"/> Email: wgehl@cityofboise.org</p>

Stacy Gust

Stacy Gust, Regulatory Administrative Assistant