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September 1, 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-22-15 Application of Idaho Company for Modifications to Schedule 79, Weatherization Assistance for Qualified Customers

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.

Sincerely,

Lin D. Madstrom

Lisa D. Nordstrom

LDN:sg

Enclosures

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Attorney for Idaho Power Company

# BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR MODIFICATIONS TO SCHEDULE 79 – WEATHERIZATION ASSISTANCE FOR QUALIFIED CUSTOMERS.

CASE NO. IPC-E-22-15

IDAHO POWER COMPANY'S 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 18, 2022, and the City of Boise City ("Boise City") on August 12, 2022.

# I. <u>Reply Comments</u>

In their Comments, both Staff and Boise City recommend approval of the Company's proposed modifications to Schedule 79 - Weatherization Assistance for Qualified Customers ("WAQC"). In these Reply Comments, the Company briefly responds to recommendations provided by both Staff and Boise City.

## A. <u>The Company Agrees with Staff's Notification Recommendation.</u>

In their comments, Staff "recommends the Company notify the Commission when surplus funds run out or provide the balance of unspent funds within six months of CAP agency contract expirations in 2025."<sup>1</sup> Idaho Power appreciates Staff's recommendation and commits to notifying the Commission when surplus funds run out or, if funds are still available, to provide the balance of unspent funds within six (6) months of the CAP agency contract expirations in 2025. The Company is committed to continuing discussions with CAP agency personnel, CAPAI, and the Energy Efficiency Advisory Group ("EEAG") to evaluate other potential opportunities that can address the carryover fund balance before 2025.

## B. <u>The Company Agrees with Boise City's Carryover Funding Reallocation</u> <u>Flexibility Recommendation.</u>

Idaho Power agrees with Boise City's recommendation "that surplus carry-over funding made available for re-weatherization to each CAP agency be subject to review and potential re-allocation each contract year at the Company's discretion."<sup>2</sup> The Company commits to adopting Boise City's recommendation and will add a reweatherization review and a potential reallocation of carryover funding, only for reweatherization projects, to its normal CAP agency funding process. Idaho Power will continue to allocate and distribute the base WAQC funds on a pro rata basis. The Company believes reviewing and potentially reallocating the carryover funding provides additional flexibility and will ensure the funds are deployed in the best interest of customers.

<sup>&</sup>lt;sup>1</sup> Staff Comments at 4-5.

<sup>&</sup>lt;sup>2</sup> City of Boise City's Formal Comments at 2.

#### II. CONCLUSION

Idaho Power appreciates the collaborative effort from all stakeholders involved in this process and believes it resulted in an option that will use the carry-over funding to the benefit of customers that need it most in the Company's service area. The Company respectfully requests that the Commission issue an Order approving Idaho Power's Application, the proposed Schedule 79, Staff's notification recommendation, and Boise City's carryover funding reallocation recommendation.

DATED at Boise, Idaho, this 1<sup>st</sup> day of September 2022.

Lin D. Madstrom

LISA D. NORDSTROM Attorney for Idaho Power Company

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 1st day of September 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:

#### **Commission Staff**

Dayn Hardie Deputy Attorney General Idaho Public Utilities Commission 472 West Washington (83702) P.O. Box 83720 Boise, Idaho 83720-0074

### **City of Boise City**

Ed Jewell Deputy City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, Idaho 83701

Wil Gehl Energy Program Manager Boise City Dept. of Public Works 150 N. Capitol Blvd. P.O. Box 500 Boise, Idaho 83701-0500 \_\_\_\_Hand Delivered

\_\_\_\_ U.S. Mail

Overnight Mail

\_\_\_\_ FAX

X Email Dayn.Hardie@puc.idaho.gov

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Stacy Cust

Stacy Gust, Regulatory Administrative Assistant