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IDAHO PUBLIC  
UTILITIES COMMISSION

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Attorney for Intervenor

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION FOR  
AUTHORITY TO MODIFY SCHEDULE 79—  
WEATHERIZATION ASSISTANCE FOR  
QUALIFIED CUSTOMERS

Case No. IPC-E-22-15

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

The city of Boise City ("Boise City") submits these formal comments on the application submitted by Idaho Power Company ("Company") to modify Schedule 79, Weatherization Assistance for Qualified Customers. Boise City, 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. 35478, issued on July 29, 2022, hereby submits its formal written comments and states as follows:


1. Boise City commends Idaho Power Company ("Company") on their responsiveness and proposed approach to proactively address challenges facing the Weatherization Assistance for Qualified Customer program ("WAQC"). WAQC is a critically important program that ensures vulnerable community members can access energy

efficiency programs, reduces household energy burden, promotes safe and efficient housing, and produces system-wide benefits.

2. Boise City recommends the Commission approve the Company's proposed modifications to Schedule 79 proposed in Attachment 1 to the Company's Application, with one additional modification detailed below, to ensure all possible re-weatherization funds are expended by the end of 2025.
3. Boise City supports the Company's proposed re-weatherization funding measures to address the surplus carryover funds. Specifically, Boise City is encouraged by the flexibility introduced by the Company to address rising HVAC replacement costs and the streamlined approach to re-weatherization that allows local Community Action Partnership ("CAP") agencies to quickly identify eligible households and deploy funding in partnership with qualified HVAC contractors. Boise City supports the Company's identified target population for re-weatherization and proposal to fund 100% of WAQC re-weatherization work, addressing the population of homes ineligible for Department of Energy Weatherization Assistance Program funding due to the rolling 14-year period.
4. While Boise City generally supports the Company's re-weatherization proposal, program eligibility guidelines, and modifications to Schedule 79, Boise City recommends the Commission introduce additional flexibility and accountability into the funding allocation process to CAP agencies. Boise City recommends 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. If a CAP agency's carry-over balance continues to grow despite the opportunity for re-

weatherization, the Company should retain the ability to re-allocate those funds to other CAP agencies across the service area that are successfully able to reduce the carryover balance and produce additional energy savings through re-weatherization. While there is a need to account for variability in weatherization project closings or delays outside of local CAP agency control in the annual base weatherization allocation, assumed carry-over of funding to the same CAP agency that has gone unspent over several years is not in the best interest of customers.

DATED this 12th day of August 2022.

  
\_\_\_\_\_  
Ed Jewell  
Deputy City Attorney

**CERTIFICATE OF SERVICE**

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

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