

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF IDAHO POWER COMPANY FOR A)
DETERMINATION OF 2022 DEMAND-) CASE NO. IPC-E-23-10
SIDE MANAGEMENT EXPENSES AS)
PRUDENTLY INCURRED.)
_____)

IDAHO POWER COMPANY
DIRECT TESTIMONY
OF
ROBERT Z. THOMPSON

1 Q. Please state your name and business address.

2 A. My name is Robert Z. Thompson. I go by my
3 middle name, and therefore, Zack Thompson is my preferred
4 name. My business address is 1221 West Idaho Street, Boise,
5 Idaho 83702.

6 Q. By whom are you employed, and in what
7 capacity?

8 A. I am employed by Idaho Power Company ("Idaho
9 Power" or "Company") as a Regulatory Analyst in the
10 Regulatory Affairs Department.

11 Q. Please describe your educational background.

12 A. In May of 2008, I received a Bachelor of Arts
13 degree in Business, Organizations, and Society with a minor
14 in Economics from Franklin & Marshall College in Lancaster,
15 Pennsylvania. In May of 2014, I received a Master of
16 Business Administration degree with a specialization in
17 Finance from Louisiana State University in Baton Rouge,
18 Louisiana. I have also attended "The Basics: Practical
19 Regulatory Training for the Electric Industry," an electric
20 utility ratemaking course offered through the New Mexico
21 State University's Center for Public Utilities, "Electric
22 Utility Fundamentals and Insights," an electric utility
23 course offered by Western Energy Institute, and "Electric
24 Rates Advanced Course," an electric utility ratemaking
25 course offered through Edison Electric Institute.

1 Q. Please describe your work experience with
2 Idaho Power.

3 A. In 2020, I was hired as a Regulatory Analyst
4 in the Company's Regulatory Affairs Department. My primary
5 responsibilities include supporting activities associated
6 with demand-side management ("DSM") as well as rate design
7 for the small general service, large general secondary
8 service, and irrigation customer classes.

9 Q. What is the purpose of your testimony in this
10 case?

11 A. The purpose of my testimony is to present the
12 Company's request for a determination that \$39,896,437 of
13 DSM expenses for the acquisition of demand-side resources
14 in 2022 was prudently incurred. This amount includes
15 \$31,585,110 funded in 2022 by the Idaho Energy Efficiency
16 Rider ("Rider") and \$8,311,328 of demand response program
17 incentive payments funded through base rates and tracked
18 annually through the Power Cost Adjustment ("PCA").

19 My testimony will: (1) provide a review of 2022 DSM
20 program performance, (2) discuss 2022 DSM expenses and
21 adjustments, (3) provide an overview of the cost-
22 effectiveness results for 2022, (4) review program
23 evaluation efforts, and (5) describe the input stakeholders
24 provided during the year.

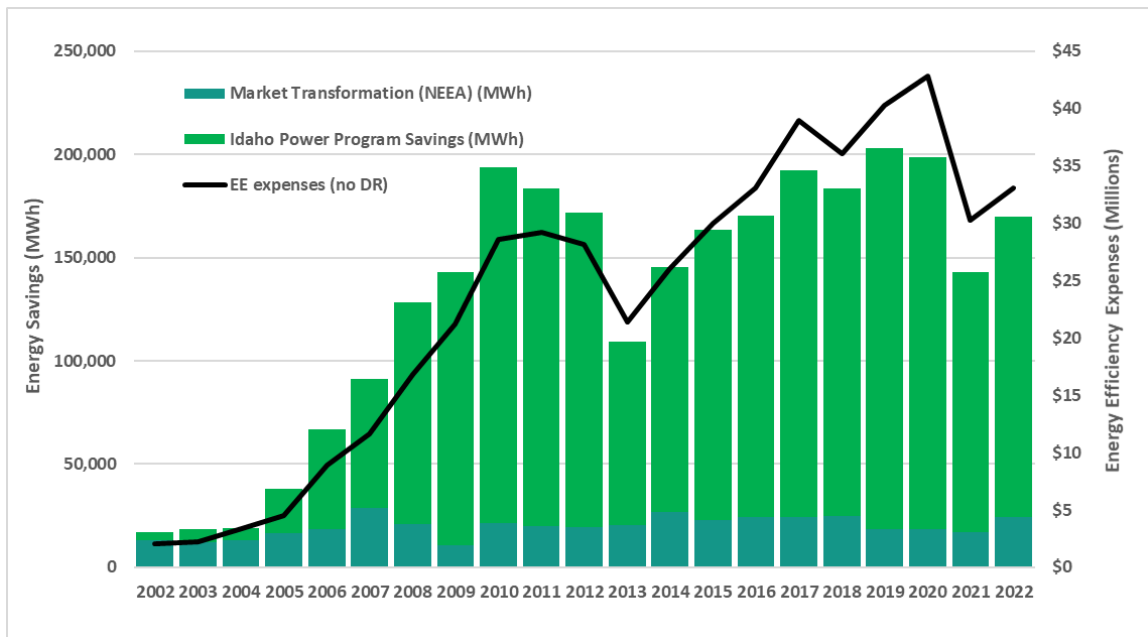
1 The Company leveraged its Energy Efficiency Advisory
 2 Group (“EEAG”) to solicit input and feedback on ways to
 3 identify opportunities to increase program effectiveness,
 4 delivery, and marketing. A summary of Idaho Power’s 2022
 5 DSM programs is provided in Table 1 below.

6 **Table 1. 2022 DSM Programs by Sector, Operational Type,**
 7 **and Location**

Program by Sector	Operational Type	State
Residential		
A/C Cool Credit.....	Demand Response	ID/OR
Easy Savings: Low-Income Energy Efficiency Education	Energy Efficiency	ID
Educational Distributions.....	Energy Efficiency	ID/OR
Energy Efficient Lighting	Energy Efficiency	ID/OR
Energy House Calls	Energy Efficiency	ID/OR
Heating & Cooling Efficiency Program	Energy Efficiency	ID/OR
Home Energy Audit.....	Energy Efficiency	ID
Home Energy Report Program.....	Energy Efficiency	ID
Multifamily Energy Savings Program	Energy Efficiency	ID/OR
Oregon Residential Weatherization.....	Energy Efficiency	OR
Rebate Advantage	Energy Efficiency	ID/OR
Residential New Construction Program	Energy Efficiency	ID
Shade Tree Project	Energy Efficiency	ID
Weatherization Assistance for Qualified Customers	Energy Efficiency	ID/OR
Weatherization Solutions for Eligible Customers.....	Energy Efficiency	ID
Commercial/Industrial		
Commercial and Industrial Energy Efficiency Program		
Custom Projects.....	Energy Efficiency	ID/OR
Green Motors—Industrial.....	Energy Efficiency	ID/OR
New Construction	Energy Efficiency	ID/OR
Retrofits.....	Energy Efficiency	ID/OR
Commercial Energy-Saving Kits.....	Energy Efficiency	ID/OR
Flex Peak Program	Demand Response	ID/OR
Oregon Commercial Audits	Energy Efficiency	OR
Small Business Direct Install.....	Energy Efficiency	ID/OR
Irrigation		
Irrigation Efficiency Rewards.....	Energy Efficiency	ID/OR
Green Motors—Irrigation.....	Energy Efficiency	ID/OR
Irrigation Peak Rewards.....	Demand Response	ID/OR
All Sectors		
Northwest Energy Efficiency Alliance.....	Market Transformation	ID/OR

1 efficiency savings in 2022. This value includes 145,440 MWh
 2 from Idaho Power's energy efficiency programs and an
 3 estimated 24,448 MWh¹ of energy efficiency market
 4 transformation savings through NEEA initiatives. Chart 1
 5 below shows the incremental annual energy efficiency
 6 savings in MWh from 2002 to the current year. Also shown in
 7 this chart are the total energy efficiency expenses for
 8 each year in millions of dollars.

9 **Chart 1. Incremental Annual Energy Efficiency Savings**
 10 **(MWh) and Energy Efficiency Expenses (\$ millions) 2002-2022**



11
 12 Note: 2022 NEEA market-transformation savings are estimated.

13 Q. Did Idaho Power meet the energy efficiency
 14 targets included in its 2021 Integrated Resource Plan
 15 ("IRP")?

¹ Because Idaho Power will not receive final 2022 savings from NEEA until the second quarter 2023, the NEEA-attributable savings is an estimate provided to Idaho Power by NEEA.

1 A. Yes. In 2022, Idaho Power achieved 19.4
2 average megawatt-hours ("aMW") of incremental energy
3 efficiency savings, including NEEA estimated energy
4 savings, which exceeded the economic technical achievable
5 potential included in the 2021 IRP of 16 aMW. The 2022
6 savings represent enough energy to power approximately
7 14,900 average homes in Idaho Power's service area for one
8 year.

9 Q. How did 2022 savings compare to 2021?

10 A. Overall portfolio savings increased by 26,968
11 MWh, or 19 percent, year-over-year compared to 2021 with
12 the main drivers being the Commercial & Industrial ("C&I")
13 Energy Efficiency Program Custom Projects, New
14 Construction, and Retrofits options. The projects within
15 these options can vary greatly in size, scale, and
16 completion, which can cause changes in overall portfolio
17 savings performance annually. These three program options
18 combined drove 53 percent of the increase in annual
19 incremental savings. A couple other notable drivers were
20 increases in savings associated with Home Energy Reports,
21 Energy Efficient Lighting, and Educational Distributions.
22 As noted in last year's prudence request, the dip in
23 savings experienced between 2020 and 2021 was largely
24 driven by a reduction in Custom Projects. 2022 portfolio
25 results were positively impacted by several projects within

1 that program option being completed within the program
2 year. The Company anticipates the overall portfolio will
3 see lower incremental savings in the coming years due to
4 Energy Independence and Security Act of 2007 ("EISA")
5 lighting standards being fully adopted in 2023.

6 Q. Does the Company engage in customer education
7 and outreach activities for which it cannot quantify or
8 report savings?

9 A. Yes. The Company engages in significant
10 educational awareness activities and marketing efforts that
11 are likely to result in energy savings experienced by
12 customers but are not quantified or claimed as part of
13 Idaho Power's annual savings. These efforts are designed to
14 reach all customer segments and are more fully explained
15 throughout the DSM 2022 Annual Report. In 2022, this
16 included activity such as: holding virtual and in-person
17 technical trainings and workshops with customers, producing
18 the *Energy@Work* and Irrigation newsletters, participating
19 in several different types of agricultural shows, hosting
20 or participating in vendor workshops promoting irrigation
21 system efficiency, publishing residential energy efficiency
22 guides which showcased behavioral changes to save energy,
23 attending other outreach activities such as home shows, and
24 supporting the Integrated Design Lab.

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1 **Demand Response**

2 Q. What level of capacity was available from
3 Idaho Power's demand response programs in 2022?

4 A. The total available capacity of Idaho Power's
5 three demand response programs (A/C Cool Credit, Flex Peak
6 Program, and Irrigation Peak Rewards) was approximately 312
7 megawatts ("MW"). This value represents the total enrolled
8 MW from participants adjusted for an expected maximum
9 realization rate.

10 Q. What level of non-coincident demand reduction
11 was provided?

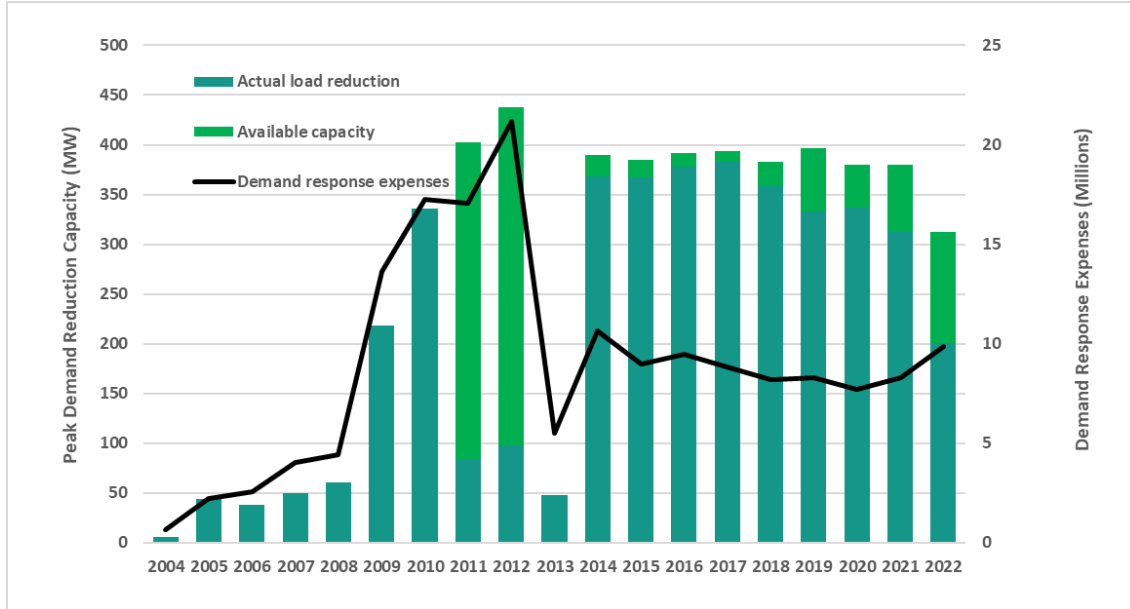
12 A. The Company's demand response programs
13 provided actual non-coincident demand reduction of 200 MW
14 during the 2022 program season. The 200 MW maximum load
15 reduction is less than 312 MW of total demand response
16 program capacity because the three demand response programs
17 are not always dispatched together during a single event
18 day and the four irrigation groups are also not always
19 dispatched coincidentally. Chart 2 below reflects the
20 annual available peak demand reduction capacity and actual
21 load reduction in MW since 2004 and the associated annual
22 expenses in millions of dollars.

23 //

24 //

25 //

1 **Chart 2. Peak Demand Reduction Capacity (MW) and Demand**
 2 **Response Expenses (\$ millions) 2004-2022**



3

4

II. 2022 DSM EXPENSES AND ADJUSTMENTS

5

Q. What amount of DSM expenses is the Company requesting the Commission find were prudently incurred?

6

A. In the delivery of energy efficiency, demand response, and market transformation programs, Idaho Power expended \$31,585,110 of Rider funds and paid \$8,311,328 in demand response program incentives, for a total of

7

\$39,896,437 spent on demand-side resource acquisition in

8

2022. Idaho Power requests that the 2022 Rider-funded DSM

9

expenses, and the 2022 demand response program incentives

10

recovered through base rates and tracked through the PCA,

11

be reviewed together for a prudence determination. Exhibit

12

No. 1 to my testimony, *2022 Idaho DSM Expenses and*

13

Adjustments for Prudence Filing, shows a breakout of these

14

expenses by program, customer sector, and funding source.

15

1 This year's Rider-funded DSM expenses increased
2 \$3,662,770, or 13 percent, compared to the DSM expenses
3 reviewed in last year's prudence case, Case No. IPC-E-22-
4 08. As described more fully above, the increase in 2022
5 expenses was primarily driven by an increase in large
6 projects participating in the C&I Program Custom Projects,
7 New Construction, and Retrofits options with total expenses
8 in those three options amounting to \$16,301,141 or
9 \$1,925,959 more compared to 2021.

10 Q. Please compare the dollar amounts in Exhibit
11 No. 1 to your testimony with Appendix 2, *2022 DSM expenses*
12 *by funding source (dollars)*, of the DSM 2022 Annual Report.

13 A. For clarity and ease of understanding, Exhibit
14 No. 1 ties to Appendix 2, which is found on page 186 of the
15 DSM 2022 Annual Report. The first column of Appendix 2
16 labeled "Idaho Rider" and the first column of Exhibit No. 1
17 labeled "Rider Expenses" match at the row labeled "Total
18 Expenses" in Exhibit No. 1 and "Grand Total" in Appendix 2
19 in the amount of \$31,673,550. All values in Exhibit No. 1
20 represent DSM expenses for the Idaho service area only.
21 Three prior year-end and three current year-end accounting
22 adjustments were necessary to accurately arrive at the
23 total 2022 expenses for purposes of the prudence
24 determination. These six adjustments are listed in Exhibit
25 No. 1 under the Adjustments section as 2021 Commercial &

1 Industrial, 2021 Residential New Construction, 2021 SBDI:
2 Small Business Direct Install ("SBDI"), 2022 Commercial &
3 Industrial Overhead, 2022 Residential Energy Efficiency
4 Education, and 2022 Residential Energy Efficiency Overhead.

5 Q. Please describe the prior year-end accounting
6 adjustments included in Exhibit No. 1.

7 A. The first adjustment of \$1,044 was associated
8 with the Commercial & Industrial program where an expense
9 should have been charged to the Oregon Rider instead of the
10 Idaho Rider in 2021. The correction to reduce the Idaho
11 Rider was made in 2022, and therefore \$1,044 needs to be
12 added back to avoid understating the 2022 prudence request.

13 The second adjustment of \$1,356 is associated with
14 Idaho activity for the Residential New Construction Program
15 that was incorrectly charged to the Oregon Energy
16 Efficiency Rider in 2021. The correction adding the expense
17 to the Idaho Rider was made in 2022, and therefore \$1,356
18 needs to be subtracted from the 2022 prudence request
19 because it was already deemed prudent by the Commission in
20 the 2021 request.

21 The final adjustment of \$7,260 associated with SBDI
22 corrected a duplicate transaction. An amount of \$7,260 of
23 Idaho SBDI expenses had originally been charged to the
24 Oregon Rider. When this was discovered in 2021, the Company
25 transferred the amount to the Idaho Rider, but the

1 transaction was duplicated adding the amount twice. The
2 duplicate transaction was identified and reversed in 2022,
3 and therefore, \$7,260 needs to be added back to avoid
4 understating the 2022 prudence request.

5 Q. Please describe the current year-end
6 accounting adjustments included in Exhibit No. 1.

7 A. Three accounting adjustments to the Rider for
8 2022 were identified through Idaho Power's review of end of
9 year expenses and the corrections were made after the 2022
10 year-end financial books were closed. The first adjustment
11 results in a reduction of \$6,998, which was related to
12 expenses associated with Commercial & Industrial Overheads
13 that should have been charged to O&M, rather than the Idaho
14 Rider.

15 The second adjustment requires inclusion of \$1,289
16 associated with the Residential Energy Efficiency Education
17 that was initially charged to O&M instead of the Idaho
18 Rider.

19 Finally, a reduction of \$89,680 was necessary to
20 remove a program administration fee the Company paid in
21 2022 that was refunded in 2023 due to services not being
22 rendered.

23 Q. What amount of Rider-funded employee DSM-
24 related labor expense did the Company incur in 2022?

1 A. The 2022 total Rider-funded DSM employee labor
2 expense incurred by the Company was \$3,392,286.

3 Q. What amount of 2022 DSM-related labor is the
4 Company requesting be funded through the Rider?

5 A. The Company is requesting \$3,381,085 in 2022
6 DSM labor expense be collected through the Rider. This
7 amount is appropriately recovered through the Rider as it
8 is equal to the Commission's authorized labor cost cap
9 detailed in Order Nos. 34874² and 35270.³ The actual 2022
10 DSM labor expense was \$11,201 over the cap as detailed in
11 Table 2 below.

Table 2. Labor Expense Calculation

2021 Total Actual Labor Expense		\$	3,205,211
2021 FTEs*	÷		<u>23.34</u>
2021 Actual Average Wage per FTE		\$	137,334
2% Cap	x		<u>1.02</u>
2022 Maximum Average Wage per FTE		\$	140,081
2022 FTEs*	x		<u>24.14</u>
2022 Maximum Allowed Labor Expense		\$	3,381,085
2022 Total Actual Labor Expense	-	\$	<u>3,392,286</u>
Amount Over Maximum Allowed Labor Expense		\$	<u>(11,201)</u>

12 *23.34 and 24.14 are rounded values.

13

14 //

² *In the Matter of Idaho Power Company's Application for a Determination of 2019 Demand-Side Management Expenses as Prudently Incurred*, Case No. IPC-E-20-15, Order No. 34874, p. 5 (Dec. 18, 2020).

³ *In the Matter of Idaho Power Company's Application for a Determination of 2020 Demand-Side Management Expenses as Prudently Incurred*, Case No. IPC-E-21-04, Order No. 35270, p. 9 (Dec. 27, 2021).

1 Q. What was the year-end 2022 balance of the
2 Rider?

3 A. The Rider account balance on December 31,
4 2022, had a negative, or under-collected, balance of
5 \$3,767,319 compared to an under-collected balance of
6 \$6,937,705 on December 31, 2021. Table 3 below shows the
7 January 2022 beginning balance, funding plus accrued
8 interest, expenses, and the ending balance as of December
9 31, 2022.

10 **Table 3. Idaho Energy Efficiency Rider (January-December**
11 **2022)**

Idaho Energy Efficiency Rider	
2022 Beginning Balance	\$ (6,937,705)
2022 Funding plus Accrued Interest as of 12/31/22	<u>34,843,936</u>
Total 2022 Funds	27,906,231
2022 Expenses as of 12/31/22	<u>(31,673,550)</u>
Ending Balance as of 12/31/22	\$ (3,767,319)

12

13 **III. 2022 COST-EFFECTIVENESS OVERVIEW**

14 Q. What is Idaho Power's overall goal when it
15 comes to DSM cost-effectiveness tests?

16 A. Idaho Power strives to ensure that DSM funds
17 collected from customers are utilized to support the
18 pursuit of cost-effective energy efficiency and demand
19 response programs, with the limited exception of certain
20 policy considerations. This goal is achieved by applying a
21 multi-step process. Prior to the actual implementation of
22 energy efficiency or demand response programs, Idaho Power

1 performs a preliminary cost-effectiveness analysis to
2 assess whether a potential program design or measure will
3 be cost-effective from the perspective of customers as well
4 as the Company. Idaho Power measures cost-effectiveness
5 under three tests: the UCT, the TRC test, and the PCT. A
6 review of each test allows for an economic assessment of
7 the life-cycle costs and benefits of a DSM investment from
8 the perspective of DSM program participants, Idaho Power,
9 and non-participating customers.

10 Idaho Power also reviews the cost-effectiveness
11 results for each program and measure on an annual basis to
12 determine whether a program should continue or be modified
13 so it remains cost-effective on an ongoing basis. If a
14 measure or program is identified as non-cost-effective,
15 Idaho Power seeks EEAG input before making its
16 determination on modifying, continuing, or discontinuing an
17 offering.

18 The cost-effectiveness test methodologies and
19 assumptions are described in more detail in the first pages
20 of Supplement 1, included in Attachment 1 to the
21 Application in this proceeding.

22 Q. Does Idaho Power believe its application of
23 the standard economic tests is consistent with Commission
24 directives?

1 A. Yes. Idaho Power believes its application of
2 the three economic tests is consistent with prior
3 Commission directives, as described in Order No. 33365:⁴

4 We thus find it reasonable for the Company to
5 continue screening potential programs using
6 each test as a guideline, and to advise us on
7 how the Company's programs fare under each
8 test. When the Company ultimately seeks to
9 recover its prudent investment in such
10 programs, however, we believe the Company may
11 (but need not exclusively) emphasize the UCT-
12 and that test's focus on Company-controlled
13 benefits and costs-to argue whether the
14 programs were cost-effective. As always, the
15 Company ultimately must persuade us that its
16 program investments were prudent under the
17 totality of the circumstances.

18
19 Because Idaho Power must ultimately demonstrate to
20 the Commission that its program investments were prudent
21 under "the totality of the circumstances", the Company
22 continues to evaluate performance from the three
23 perspectives.

24 **A. 2022 Cost-Effectiveness Results**

25 Q. What were the results of the 2022 cost-
26 effectiveness analyses?

27 A. Exhibit No. 2 to my testimony, *2022 Cost-*
28 *Effectiveness Summary by Program, Sector, and Portfolio,*
29 shows the results of the UCT, TRC test, and PCT for every

⁴ *In the Matter of the Application of Idaho Power Company for a Determination of 2014 Demand-Side Management Expenditures as Prudently Incurred*, Case No. IPC-E-15-06, Order No. 33365, p. 9-10 (Aug. 28, 2015).

1 energy efficiency program aggregated by sector and for the
 2 overall portfolio. As shown in Table 4, the overall DSM
 3 Portfolio achieved benefit/cost ratios greater than 1.0 for
 4 each of the three cost-effectiveness tests. All three of
 5 the program sectors achieved benefit/cost ratios of greater
 6 than or equal to 1.0 from the UCT and PCT perspectives with
 7 the Residential Sector having a TRC less than 1.0.

8 **Table 4. 2022 Benefit/Cost by Sector & Portfolio**

Sector	Utility Cost Test (UCT)	Total Resource Cost (TRC) Test	Participant Cost Test (PCT)
Residential*	1.00	0.76	2.89
Commercial/Industrial	2.71	1.34	1.71
Irrigation	2.69	2.54	2.66
Portfolio*	2.02	1.43	2.01

*Does not include Weatherization Assistance for Qualified Customers Program

9

10 Q. Did the Company quantify the Residential
 11 Sector and DSM Portfolio cost-effectiveness, including the
 12 costs and benefits of the Weatherization Assistance for
 13 Qualified Customers ("WAQC") program?

14 A. Yes. Table 5 below shows the cost-
 15 effectiveness of the Residential Sector and the Overall DSM
 16 Portfolio with and without the WAQC program included.

17 **Table 5. Residential and Portfolio Cost-Effectiveness with
 18 and without WAQC**

Sector	WAQC Not Included			WAQC Included		
	UCT	TRC	PCT	UCT	TRC	PCT
Residential	1.00	0.76	2.89	0.84	0.67	2.56
Portfolio	2.02	1.43	2.01	1.94	1.40	2.00

19

1 While the WAQC program remains non-cost-effective
2 from an economic perspective, it provides real savings to
3 customers that would otherwise likely be unable to afford
4 to weatherize their homes and offers health and safety
5 benefits to customers in need that are not quantified
6 through the economic tests.

7 Q. What assumptions were utilized to calculate
8 the sector and portfolio cost-effectiveness for 2022?

9 A. Idaho Power relies on research conducted by
10 third parties to obtain savings and cost assumptions for
11 various measures. The Company fixes savings assumptions
12 when budgets and goals are established for the next
13 calendar year unless codes and standards change, or program
14 updates necessitate a need to use updated savings. The
15 remaining inputs are obtained from the Company's IRP
16 planning process. Because the 2021 IRP was not acknowledged
17 at the time 2022 DSM program planning occurred, Idaho Power
18 used the avoided costs from the acknowledged 2019 Second
19 Amended IRP.

20 To calculate the sector cost-effectiveness, Idaho
21 Power includes the benefits and costs associated with
22 programs that produce quantifiable energy savings. The
23 portfolio cost-effectiveness is the sum of all energy
24 efficiency activities, including those that do not have
25 savings associated with them, such as overhead expenses.

1 Q. What are the results of specific program cost-
2 effectiveness?

3 A. As reflected in Exhibit No. 2 to my testimony,
4 *2022 Cost-Effectiveness Summary by Program, Sector, and*
5 *Portfolio*, on an individual program basis, 9 of the 17
6 energy efficiency programs offered in Idaho for which the
7 Company calculates cost-effectiveness had benefit/cost
8 ratios greater than 1.0 under the UCT.

9 The PCT ratios cannot be calculated for programs
10 that do not have a direct customer cost, and the PCT is
11 shown as "N/A" in Exhibit No. 2 for those programs. The
12 details of these calculations are found in Supplement 1 of
13 the DSM 2022 Annual Report.

14 Q. Did Idaho Power calculate cost-effectiveness
15 for each measure within each energy efficiency program it
16 offers?

17 A. Yes. In 2022, Idaho Power evaluated the
18 benefits and costs of 300 measures. The results of these
19 calculations, along with measure assumption details and
20 source documentation, can be found in Supplement 1 to the
21 DSM 2022 Annual Report.

22 Q. How did Idaho Power address any individual
23 measures that are not cost-effective based on one or more
24 tests?

1 A. The cost and benefit values used in the
2 various analyses are based on markets, technologies,
3 economic inputs, savings estimates, and cost estimates,
4 which can change over time. When a measure is identified as
5 non-cost-effective at a specific point in time, Idaho Power
6 first evaluates whether the inputs used in the calculations
7 are still applicable. Then the Company determines if the
8 measure parameters should be modified or if the measure
9 should be eliminated altogether. For additional detail on
10 measure analysis, please refer to Supplement 1 to the DSM
11 2022 Annual Report.

12 **B. Non-Cost-Effective Programs**

13 **1. Income Qualified Weatherization**

14 Q. Please explain what drivers influence the
15 cost-effectiveness results for the WAQC and Weatherization
16 Solutions for Eligible Customers ("Solutions") programs?

17 A. The WAQC and Solutions programs provide real
18 and substantial per home savings, but due to the costs of
19 comprehensive whole-house weatherization, it is difficult
20 for the value of the savings to outweigh the costs. The
21 weatherization services provided through the WAQC program
22 are consistent with the Idaho State Weatherization
23 Assistance Program guidelines, and both the WAQC and
24 Solutions programs are offered at no charge to the
25 participant. Please refer to pages 94 and 103 in the DSM

1 2022 Annual Report for the savings, cost, and the number of
2 homes weatherized in 2022.

3 Q. Does Idaho Power plan to continue offering the
4 WAQC and Solutions programs in the future?

5 A. Yes. While the Company has identified that the
6 programs are not cost-effective under the UCT, unless the
7 Commission directs otherwise, Idaho Power will continue to
8 offer them to the Company's limited-income customers on an
9 ongoing basis. The Company will also continue to consult
10 the EEAG and weatherization managers who oversee the
11 weatherization work to look for ways to improve outreach
12 and the cost-effectiveness of these programs as
13 opportunities are available.

14 **2. Discontinued Programs in 2022**

15 Q. Which programs did the Company discontinue in
16 2022?

17 A. The Company discontinued both the Energy House
18 Calls and Multifamily Energy Savings Programs on June 30,
19 2022 and December 31, 2022, respectively due to the
20 expectation that these programs will not be cost-effective
21 as currently structured going forward. After evaluating the
22 programs internally using Regional Technical Forum ("RTF")
23 savings and 2021 IRP avoided costs, as well as
24 incorporating input from its EEAG, the Company determined
25 it was prudent to end the programs at this time. The

1 Company will continue to evaluate potential program
2 structures with the objective of increasing the
3 availability of cost-effective offerings to customers with
4 manufactured homes and multifamily dwellings. The Company
5 discussed its plans for the programs at the February 2022,
6 May 2022, and August 2022 EEAG meetings.

7 **3. Programs to be Discontinued in 2023**

8 Q. Is the Company planning on discontinuing any
9 of its programs in 2023?

10 A. Yes. the Company is discontinuing both its
11 SBDI and Commercial Energy-Savings Kits ("CSKs") Programs
12 in 2023 on March 31, 2023 and June 30, 2023 respectively.
13 The SBDI program had a defined time-period in which the
14 program was offered based on the contractual agreement with
15 the third-party vendor completing the work. All of the
16 program savings come from lighting measures, and the
17 program was originally intended to be offered for a limited
18 time from November 2019 to December 2022 (it was extended
19 to March 2023 due to delays caused by COVID-19). The
20 program was successfully utilized by customers throughout
21 the entirety of the Company's service area. The Company
22 does not expect a renewed contract with the existing vendor
23 would result in a cost-effective program, and as a result,
24 it is not proposing to continue the offering at this time.

1 The Company discussed its plans at the November 2022 and
2 February 2023 EEAG meetings.

3 The Company will also discontinue its CSKs in 2023.
4 Idaho Power discussed the cost-effectiveness challenges
5 facing the offering at the August 2021, November 2021, and
6 November 2022 EEAG meetings. In 2021, the RTF deactivated
7 the workbooks and zeroed out the savings for both pre-rinse
8 spray valves and advanced power strips. As a result, very
9 little differentiated the three CSK configurations for
10 restaurants, retail, and offices. Based on feedback from
11 EEAG at the November 2021 meeting, the Company began
12 offering a streamlined kit in 2022.

13 The savings for CSKs is largely based on the assumed
14 installation rates for each kit item. The 2022 evaluation
15 recommended the Company reconsider the inclusion of the
16 exit signs retrofit kits and the aerators due to low
17 install rates and the associated lower savings. The Company
18 had already reduced the number of exit sign retrofit kits
19 and aerators when designing the streamlined kit option but
20 did not remove them completely. Additionally, the
21 evaluators recommended the removal of the LED lightbulbs
22 from the kit. In June 2023, EISA lighting standards will
23 take effect, at which point certain lighting savings will
24 no longer be claimed by utility programs. The updated
25 standards have a significant impact on the CSKs, as the

1 kits offer two different kinds of LED lightbulbs. Once the
2 LED bulbs are removed, the only items remaining in the kit
3 would be one-exit sign retrofit kit, one-kitchen aerator,
4 and one-bathroom aerator which already have low
5 installation rates. Also, the savings for the faucet
6 aerators are dependent on the commercial customer having
7 electric water heat. As a result, the Company has concluded
8 the CSKs will not be cost-effective going forward, leading
9 to its decision to end the CSK offering on June 30, 2023.
10 The Company discussed its plans at the February 2023 EEAG
11 meeting.

12 **4. Home Energy Reports**

13 Q. What were the cost-effectiveness results for
14 the Home Energy Reports program?

15 A. As shown in Exhibit No. 2, the Home Energy
16 Report program achieved a one-year UCT of 0.71 and a TRC of
17 0.79,⁵ which was an improvement from the 2021 one-year UCT
18 and TRC ratios of 0.57 and 0.62 respectively. The Company
19 also calculated a life cycle cost-effectiveness for the
20 program that results in a UCT of 1.17 and a TRC of 1.29.
21 The life cycle cost-effectiveness uses savings generated
22 through 2026.

⁵UCT and TRC ratios include costs associated with the 2022 impact evaluation. UCT would be 0.74 and TRC would be 0.81 without evaluation expenses.

1 Q. What are the Company's plans regarding
2 continuation of the Home Energy Reports program?

3 A. The Company believes the program will be cost
4 effective in 2023 because of the additional capacity
5 benefits that are included in the 2021 IRP avoided costs
6 where this year's cost-effectiveness was calculated using
7 the 2019 Second Amended IRP avoided costs. Additionally,
8 the evaluation results showed the overlap percentage used
9 to calculate savings to avoid double counting with similar
10 programs savings was less than initially thought.
11 Therefore, program savings had a realization rate over one
12 hundred percent as shown later in my testimony in the
13 Evaluation Section.

14 Q. What other factors will the Company consider
15 when evaluating the cost-effectiveness of the Home Energy
16 Reports program?

17 A. As I noted, the program is cost-effective when
18 evaluated over the life cycle of the program. Typically,
19 Idaho Power evaluates cost effectiveness based on the value
20 associated with incremental savings achieved in the program
21 year and savings expected through the duration of the
22 measure life. A behavioral program, like Home Energy
23 Reports, has a "measure life" of 1-year, however, it is
24 expected that savings will continue to accrue (at a
25 degraded level) for at least 2-years after the program

1 concludes. Accordingly, Idaho Power will continue to
2 evaluate the appropriateness of reporting this program's
3 cost-effectiveness on a life-cycle basis.

4 **5. Heating and Cooling Efficiency Program**

5 Q. What were the cost-effectiveness results for
6 the Heating and Cooling Efficiency program?

7 A. As shown in Exhibit No. 2, the Heating and
8 Cooling Efficiency Program achieved a UCT of 0.98 and a TRC
9 of 0.30. The program was just slightly under 1.0 from the
10 UCT prospective, which was primarily driven by the
11 evaluation costs the program absorbed associated with the
12 2021 impact and process evaluation that was completed in
13 2022. If the evaluation costs are removed, the UCT ratio
14 for the program would be 1.00.

15 Q. Does the Company anticipate seeking any
16 modifications to the program aimed at improving cost-
17 effectiveness?

18 A. Yes. The Company anticipates making program
19 changes in 2023 that it expects will have a positive impact
20 on cost-effectiveness. These modifications may include
21 removal of some measures, modifications to adjust measures,
22 and incentive adjustments to measures. The Company will
23 consult with EEAG prior to making any future program
24 decisions.

25 //

1 **C. Demand Response Cost-Effectiveness**

2 Q. Does Idaho Power evaluate cost-effectiveness
3 for its three demand response programs?

4 A. Yes. The methodology approved in Order No.
5 35336⁶ is used to determine the cost-effectiveness of the
6 demand response ("DR") programs and sets the maximum
7 avoided cost value. In accordance with the approved
8 methodology, the 2022 cost-effectiveness threshold for
9 demand response is \$82.91 per kW year.

10 Q. How was the \$82.91 determined?

11 A. Using the approved method, the avoided cost
12 calculation for the demand response programs is as follows:

13 *(Levelized Fixed Costs - Additional Benefits)*
14 *x Effective Load Carrying Capacity ("ELCC") of Annual*
15 *Demand Response Capacity Compared to Proxy Resource*
16 *= \$ per kW year Demand Response Avoided Costs*

17 Each of the three components have been updated and
18 are:

19 1. From the 2021 IRP, the 2022 levelized fixed
20 cost value of a Simple-Cycle Combustion Turbine ("SCCT")
21 was determined to be \$131.60 per kW per year.

22 2. From the 2021 IRP, to determine the

⁶ *In the Matter of Idaho Power Company's Application for Approval to Modify its Demand Response Programs, Case No. IPC-E-21-32, Order No. 35336, p. 9-10 (Mar. 4, 2022).*

1 the full 60 hours allowed, the total costs would have been
2 approximately \$12.0 million on a system-wide basis.

3 **Table 6. Demand Response Program 2022 \$ per kW year**

Program	\$ per kW year
Residential A/C Cool Credit	\$30.99
C&I Flex Peak	\$23.34
Irrigation Peak Rewards	\$40.97
Total Demand Response Portfolio	\$38.42

4

5 Q. Were the demand response programs cost-
6 effective?

7 A. Yes. All three of the Company's demand
8 response programs, as well as the demand response
9 portfolio, had a cost per kW less than the 2022 threshold
10 of \$82.91, meaning the programs were cost-effective.

11 **IV. EVALUATION ACTIVITY OVERVIEW**

12 Q. What is the Company's approach to DSM program
13 evaluation?

14 A. To ensure the ongoing cost-effectiveness of
15 programs through validation of energy savings and demand
16 reduction, and to guide the efficient management of its
17 programs, the Company utilizes evaluations conducted by
18 third-party contractors chosen through a competitive
19 bidding process. Idaho Power uses industry-standard
20 protocols, internal analyses, and regional and national
21 studies to inform its internal and external evaluation
22 efforts. The Company has generally conducted impact
23 evaluations every three years, and process evaluations for

1 relatively new programs, or when a program has significant
2 changes. Supplement 2 to the DSM 2022 Annual Report
3 provides additional information regarding how Idaho Power
4 evaluates its programs.

5 Q. How does Idaho Power utilize the evaluations
6 described above?

7 A. Idaho Power uses the results of its
8 evaluations to inform decisions related to program
9 improvement, to compare processes to industry best
10 practices, and to benchmark and validate reported program
11 savings.

12 Q. What evaluation activities took place in 2022?

13 A. In addition to the annual cost-effectiveness
14 analyses that the Company conducts for each program, Idaho
15 Power contracted with several third-party evaluators to
16 conduct impact and process evaluations in 2022. Evaluations
17 conducted by these evaluators were on the following
18 programs:

- 19 • Impact and process evaluations on Commercial
20 Energy-Savings Kits, C&I New Construction, and
21 C&I Retrofits programs.
- 22 • Impact evaluation on Home Energy Reports.

23 In addition to these third-party evaluations, Idaho
24 Power completed internal analyses of the Irrigation Peak

1 Rewards, Flex Peak, and A/C Cool Credit demand response
2 programs.

3 The impact evaluations that were conducted in 2022
4 analyzed reported savings from the 2021 program year.

5 Realization rates were as follows:

- 6 • Commercial Energy-Savings Kits: 43.82 percent.
- 7 • C&I New Construction Program: 102.5 percent.
- 8 • C&I Retrofits Program: 96.4 percent.
- 9 • Home Energy Reports: 109.65 percent.

10 The final reports for these evaluations, and the
11 market effects evaluations conducted by NEEA, are included
12 in Supplement 2 to the DSM 2022 Annual Report.

13 Q. Does Idaho Power have a DSM program evaluation
14 plan for 2023-2024?

15 A. Yes. The evaluation plan is included as
16 Exhibit No. 3 to my testimony and is also included in
17 Supplement 2 to the DSM 2022 Annual Report. In 2023, Idaho
18 Power's evaluation plan includes the following third-party
19 evaluations:

- 20 • Impact and process evaluations for Home Energy
21 Audit.
- 22 • Impact evaluations for Residential New
23 Construction Program, Shade Tree Project, Small
24 Business Direct-Install, and Irrigation
25 Efficiency Rewards.

1 Q. Has the Company completed the Commission's
2 directive to complete an independent Evaluation,
3 Measurement, and Verification ("EM&V") of NEEA savings?

4 A. In August 2022, the Company contracted with an
5 independent evaluator to verify the accuracy of NEEA
6 claimed savings, as directed by the Commission in Order No.
7 35720.⁷ In part, the scope of the evaluation includes
8 clarifying the savings NEEA claims, verifying the
9 allocation of savings to NEEA member utilities, and
10 determining the cost-effectiveness of the savings for the
11 member utilities based on the utilities' DSM avoided cost.

12 Idaho Power reviewed an initial draft report in
13 February 2023 and has asked the evaluator to clarify
14 several items prior to finalizing the report. The Company
15 expects to receive the final report in the coming weeks and
16 will develop a plan of action based on the final
17 recommendations and findings identified in the report.
18 Because the report was not complete prior to the
19 preparation of this case, Idaho Power anticipates filing a
20 supplemental application by no later than the end of June
21 2023, where it will file the report with the Commission in

⁷ *In the Matter of Idaho Power Company's Application for a Determination of 2020 Demand-Side Management Expenses as Prudently Incurred*, Case No. IPC-E-21-04, Order No. 35270, p. 9 (Dec. 27, 2021).

1 this docket. At that time, Idaho Power will identify its
2 near-term plan associated with addressing any findings.

3 **V. STAKEHOLDER INPUT**

4 Q. What is the EEAG?

5 A. In 2002, Idaho Power formed the EEAG to
6 provide input on enhancing existing DSM programs,
7 recommending new energy efficiency measures, and
8 implementing energy efficiency programs. Members include
9 customer representatives from residential, irrigation,
10 commercial, and industrial sectors as well as technical
11 experts, representatives for limited-income individuals,
12 environmental organizations, state agencies, county and
13 city governments, the Commission, the Public Utility
14 Commission of Oregon, and Idaho Power.

15 Q. What is the structure of EEAG meetings?

16 A. The EEAG generally meets quarterly in-person
17 at Idaho Power's corporate offices and through webinars as
18 needed. All EEAG meetings were held virtually in 2022, and
19 the Company believes the member participation and input
20 remained strong in the virtual format.

21 The agenda during EEAG meetings is varied, but
22 typically includes: program and project updates, new energy
23 efficiency program or measure proposals, marketing methods,
24 specific measure details including cost-effectiveness, the
25 status of energy efficiency expenses, and general

1 information on DSM issues. When appropriate, the Company
2 invites experts to speak on evaluations, research, and
3 other topics of interest to enhance EEAG's understanding.

4 Q. How did Idaho Power solicit guidance from the
5 EEAG during the 2022 program year?

6 A. In 2022, the Company held four virtual EEAG
7 meetings, and during these meetings, Idaho Power discussed
8 and requested recommendations on a broad range of DSM
9 issues. As explained in greater detail in the DSM 2022
10 Annual Report, the list below includes some of the topics
11 Idaho Power worked with the EEAG on for development,
12 design, promotion, or input:

- 13 • Energy Efficient Lighting: The Company will
14 continue offering the Lighting Buydown Program
15 through June 30, 2023. After that date, the
16 Department of Energy OE will begin enforcing
17 federal EISA lighting standards with financial
18 penalties to those retailers that continue to
19 sell inefficient lightbulbs. This allows the
20 Company and customers to realize lighting savings
21 as long as possible.
- 22 • Heating & Cooling Efficiency: Idaho Power began
23 offering two new measures through the program on
24 July 1, 2022 that provide a cash incentive to
25 customers who install a central A/C or a ground

1 source heat pump. The incentives apply to both
2 existing homes and new construction.

3 • Welcome Kits: Idaho Power continued to contract
4 with a third-party vendor to distribute energy
5 efficiency kits to the company's first-time
6 customers. With EEAG collaboration, the kit
7 contents were adjusted to improve cost-
8 effectiveness.

9 **VI. CONCLUSION**

10 Q. Do you believe that the information contained
11 in this testimony and attached exhibits supports a prudence
12 determination for 2022 DSM expenses?

13 A. Yes. The DSM 2022 Annual Report details Idaho
14 Power's DSM offerings in program specific sections. Based
15 on the DSM 2022 Annual Report, the testimony set forth
16 above, and the attached exhibits, Idaho Power respectfully
17 requests the Commission determine that \$39,896,437 was
18 prudently incurred for the acquisition of demand-side
19 resources in 2022.

20 Q. Does this conclude your testimony?

21 A. Yes, it does.

1 ATTESTATION OF TESTIMONY

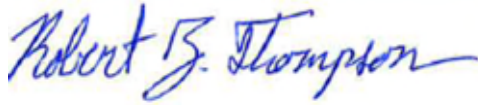
2
3 STATE OF IDAHO)
4) ss.
5 County of Ada)

6
7 I, Robert Z. Thompson, having been duly sworn to
8 testify truthfully, and based upon my personal knowledge,
9 state the following:

10 I am employed by Idaho Power Company as a Regulatory
11 Analyst in the Regulatory Affairs Department and am
12 competent to be a witness in this proceeding.

13 I declare under penalty of perjury of the laws of
14 the state of Idaho that the foregoing pre-filed testimony
15 and exhibits are true and correct to the best of my
16 information and belief.

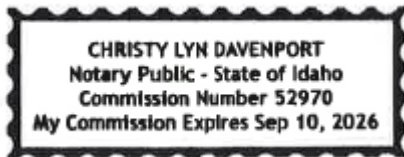
17 DATED this 15th day of March 2023.

18 

19 _____
20 Robert Z. Thompson

21
22 SUBSCRIBED AND SWORN to before me this 15th day of
23 March 2023.

24 



25
26 Notary Public for Idaho
27 Residing at Ada County Idaho
28 My commission expires: 09/10/2026
29
30

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-23-10**

IDAHO POWER COMPANY

THOMPSON, DI

TESTIMONY

EXHIBIT NO. 1

Idaho Power Company
2022 Idaho DSM Expenses and Adjustments for Prudence Filing

Expenses	Rider Expenses	Demand Response Program Incentives Recorded in PCA	Total Expenses
Energy Efficiency/Demand Response			
Residential			
A/C Cool Credit	\$ 429,722	\$ 375,320	\$ 805,042
Easy Savings: Low-Income Energy Efficiency Education	-	-	-
Educational Distributions	1,061,898	-	1,061,898
Energy Efficient Lighting	505,430	-	505,430
Energy House Calls	36,734	-	36,734
Heating & Cooling Efficiency Program	636,597	-	636,597
Home Energy Reports	964,709	-	964,709
Home Energy Audit	184,650	-	184,650
Multifamily Energy Savings Program	32,634	-	32,634
Rebate Advantage	157,746	-	157,746
Residential New Construction	236,962	-	236,962
Shade Tree Project	128,673	-	128,673
Weatherization Solutions for Eligible Customers	198,198	-	198,198
Commercial/Industrial			
Custom Projects	8,753,084	-	8,753,084
New Construction	2,762,412	-	2,762,412
Retrofits	4,785,645	-	4,785,645
Commercial Energy-Saving Kits	21,604	-	21,604
FlexPeak Program	84,582	283,651	368,233
Small Business Direct Install	1,317,820	-	1,317,820
Irrigation			
Irrigation Efficiency	1,950,122	-	1,950,122
Irrigation Peak Rewards	569,467	7,652,357	8,221,825
Energy Efficiency/Demand Response Total	\$ 24,818,689	\$ 8,311,328	\$ 33,130,017
Market Transformation			
NEEA	2,650,440	-	2,650,440
Market Transformation Total	\$ 2,650,440	\$ -	\$ 2,650,440
Other Programs and Activities			
Commercial/Industrial Energy Efficiency Overhead	826,911	-	826,911
Energy Efficiency Direct Program Overhead	296,204	-	296,204
Residential Energy Efficiency Education Initiative	287,839	-	287,839
Residential Energy Efficiency Overhead	1,528,355	-	1,528,355
Other Programs and Activities Total	\$ 2,939,309	\$ -	\$ 2,939,309
Indirect Program Expenses			
Energy Efficiency Accounting & Analysis	1,236,470	-	1,236,470
Energy Efficiency Advisory Group	15,575	-	15,575
Special Accounting Entries			
Special Accounting Entries	13,068	-	13,068
Indirect Program Expenses Total	\$ 1,265,112	\$ -	\$ 1,265,112
Total Expenses	\$ 31,673,550	\$ 8,311,328	\$ 39,984,878
Adjustments			
Prior year-end accounting adjustments:			
2021 Commercial & Industrial (a)	1,044		1,044
2021 Residential New Construction (b)	(1,356)		(1,356)
2021 SBDI: Small Business Direct Install (c)	7,260		7,260
Current year-end accounting adjustments:			
2022 Commercial & Industrial Overhead (d)	(6,998)		(6,998)
2022 Residential Energy Efficiency Education (e)	1,289		1,289
2022 Residential Energy Efficiency Overhead (f)	(89,680)		(89,680)
2022 Prudence Filing Total	\$ 31,585,110	\$ 8,311,328	\$ 39,896,437

(a) 2021 Oregon Rider expense that was initially charged to the Idaho Rider. The correction was made in 2022.

(b) 2021 Idaho Rider expense initially charged to the Oregon Rider. The correction was made in 2022.

(c) Duplicate 2021 Idaho Rider transaction. The correction was made in 2022.

(d) 2022 O&M expense initially charged to the Idaho Rider. The correction was made in 2023.

(e) 2022 Idaho Rider expense initially charged to O&M. The correction was made in 2023.

(f) Program administration fee charged to the Idaho Rider in 2022 and refunded in 2023.

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-23-10**

IDAHO POWER COMPANY

THOMPSON, DI

TESTIMONY

EXHIBIT NO. 2

2022 Cost-Effectiveness Summary by Program, Sector, and Portfolio

Program/Sector	2022 Benefit/Cost Tests		
	Utility Cost Test (UCT)	Total Resource Cost (TRC)	Participant Cost (PCT)
Educational Distributions	1.31	1.62	N/A
Energy Efficient Lighting	1.68	1.52	4.35
Energy House Calls ¹	0.70	0.77	N/A
Heating & Cooling Efficiency Program	0.98	0.30	0.76
Home Energy Reports ²	0.71	0.79	N/A
Multifamily Energy Savings Program ³	0.49	0.68	N/A
Rebate Advantage	1.18	0.54	1.56
Residential New Construction	1.45	0.84	1.70
Shade Tree Project	1.02	1.21	N/A
Weatherization Assistance for Qualified Customers	0.17	0.32	N/A
Weatherization Solutions for Eligible Customers	0.15	0.23	N/A
Residential Energy Efficiency Sector⁴	1.00	0.76	2.89
Commercial and Industrial Energy Efficiency Program			
Custom Projects	2.88	1.12	1.17
New Construction	4.25	3.64	5.41
Retrofits	2.01	1.11	1.61
Commercial Energy-Savings Kits	0.78	0.87	N/A
Small Business Direct Install	0.95	1.50	N/A
Commercial/Industrial Energy Efficiency Sector⁵	2.71	1.34	1.71
Irrigation Efficiency	2.69	2.54	2.66
Irrigation Energy Efficiency Sector⁶	2.69	2.54	2.66
Energy Efficiency Portfolio⁷	2.02	1.43	2.01

1 Program closed June 30, 2022

2 Cost-effectiveness based on 2022 savings and expenses. Cost-effectiveness ratios are also calculated for the program life-cycle and are 1.17 and 1.29 for the UCT and TRC respectively.

3 Program closed December 31, 2022

4 Residential sector cost-effectiveness excludes WAQC benefits and costs. If included, the UCT, TRC, and PCT would be 0.84, 0.67, and 2.56 respectively.

5 Commercial/Industrial Energy Efficiency Sector cost-effectiveness ratios include savings and participant costs from Green Motors Rewinds.

6 Irrigation Energy Efficiency Sector cost-effectiveness ratios include savings and participant costs from Green Motors Rewinds.

7 Portfolio cost-effectiveness excludes WAQC benefits and costs. If included, the UCT, TRC, and PCT would be 1.94, 1.40, and 2.00 respectively.

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-23-10**

IDAHO POWER COMPANY

THOMPSON, DI

TESTIMONY

EXHIBIT NO. 3

Customer Relations and Energy Efficiency 2022-2023 Program Evaluation Plan

	2023	2022	2021	2020	2019	2018	2017	2016	2015 ¹	2014	2013	2012	2011	2010
Residential Energy Efficiency Programs														
Educational Distributions				I/P										
Energy Efficient Lighting														
Energy House Calls					I/P								I	P
Heating & Cooling Efficiency Program			I/P				I/P				P	I		P
Home Energy Audit	I/P						I			P				
Home Energy Reports		I		P										
Multifamily Energy Savings Program	I/P					I/P								
Rebate Advantage				I				I/P					I	
Residential New Construction Pilot Program	I				I/P									
Shade Tree Project	I				O					P				
Weatherization Assistance for Qualified Customers	O			O						O	P	I		
Weatherization Solutions for Eligible Customers	O			O						O	P	I		
Commercial/Industrial Energy Efficiency Programs														
Commercial Energy-Saving Kits		I/P												
Custom Projects			I/P			I	P			I/P			I	P
New Construction		I/P			I		P	I				I		P
Retrofits		I/P			I		P	I			P	I		P
Small Business Direct-Install	I			P										
Irrigation Energy Efficiency Programs														
Irrigation Efficiency Rewards	I			I/P				I/P		P/O	I/P			P
Demand-Response Programs														
A/C Cool Credit	O	O	I	O	I	O	O	I	I	I	O	P	O	
Flex Peak Program	O	O	I/O	O	O	O	O	I/O	I/O		P/O		O	
Irrigation Peak Rewards	O	O	I/O	O	O	O	O	O	I/O	O	O		O	

¹ Energy efficiency programs evaluated in 2015 have since been eliminated or combined into another program.

Evaluation Type: I = Impact, P = Process, O = Other	
Program not yet in existence	