



PUBLIC WORKS DEPARTMENT

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IDAHO PUBLIC
UTILITIES COMMISSION

January 12, 2024

Ms. Monica Barrios-Sanchez, Interim Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Boulevard
Building 8, Suite 201-A
Boise, ID 83714

SUBJECT: Case No. IPC-E-23-24 Idaho Power Company's Application for Modifications to the Company's Commercial & Industrial Demand Response Program, Schedule 82

(Submitted Electronically)

Dear Ms. Barrios-Sanchez,

The City of Boise ("City") submits the following comments on the application by Idaho Power Company ("Company") to modify Schedule 82.

Boise City recommends the Commission approve the Company's application and direct implementation of the modifications to the Flex Peak Program in advance of the 2024 demand response ("DR") season.

The City supports the Company's efforts in this application to increase customer participation in the Flex Peak Program, increasing DR potential while maintaining program cost-effectiveness. Specifically, the City believes the movement to a tiered, fixed capacity payment rate structure will encourage additional commercial and industrial program participation and will ensure incentives paid are aligned with customer load reduction throughout the entire DR season.

Boise City believes the Company's proposed changes in this docket are reasonable and will facilitate demand-side-resources cost-effectively meeting the Company's growing need for load flexibility and peak reduction. The proposed changes in this application align with the Company's 2023 Integrated Resource Plan and its identification of DR capacity as a near-term least-risk resource.

If you have any questions or need additional information, please contact the Climate Action Division of the Department of Public Works at (208) 608-7150.

Cc: Megan Goicoechea Allen, Idaho Power
Lisa Nordstrom, Idaho Power
Connie Aschenbrenner, Idaho Power
Zack Thompson, Idaho Power
Adam Triplett, Deputy Attorney General