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IDAHO PUBLIC
UTILITIES COMMISSION

March 20, 2020

Ms. Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

INT-6-19-04

RE: Intermountain Gas Company Response to Order No. 34536

Dear Ms. Hanian:

Intermountain Gas Company, in response to Order No. 34536 dated January 21, 2020, submits the following plan to evaluate the Energy Efficiency Program.

Intermountain Gas Energy Efficiency Evaluation Plan - Proposed

Spring 2020 – Impact and Process Evaluation

Intermountain has contracted with a third-party evaluator to conduct an impact evaluation and process evaluation. The two most redeemed measures from the initial Energy Efficiency Program, the Whole Home incentive and the 95% AFUE natural gas furnace incentive, will undergo an impact evaluation by a third-party to verify savings based on actual billed consumption.

This study will also include a process evaluation of the entire Energy Efficiency Program. The process evaluation will include evaluation of the following: program design, program administration, program implementation and delivery, customer satisfaction, and market response.

Due to the fact all the remaining measures contribute a significantly smaller portion of savings to the portfolio, these measures will be updated with the most current saving estimates and incentive levels from the 2019 Conservation Potential Assessment (CPA), and implemented based on the findings of the process evaluation. These measures will be scheduled for evaluation once we have a full year of participation under the revised program.



Mid 2020 – Regulatory Filing – Commercial Program

The impact and process evaluation will be completed mid-year 2020. Impact and process evaluation findings, updated avoided costs, saving estimates and incentive levels from the 2018 CPA will all be used to design a commercial program. The proposed commercial offering will be presented to the Stakeholder Committee for input and feedback.

Once all the feedback has been incorporated, Intermountain will file for approval to begin a Commercial Energy Efficiency Program.

Fall 2020 – Program Implementation – Commercial Program

Following approval by the Commission Intermountain will launch the Commercial Program.

Fall 2020 – Regulatory Filing – Residential Program

The results of the impact evaluation and updated Avoided Cost study will be used to update the furnace and whole home rebates. The 2019 CPA study and updated Avoided Cost study will be used to update other existing rebates as well as develop additional residential rebate offerings. The results of the process evaluation will also be used to inform necessary revisions to the delivery of the Residential Program.

All of these proposed residential program changes will be presented to the Stakeholder Committee for input. Once any feedback has been incorporated, Intermountain will file for approval of a revised Residential Program.

January 2021 – Program Implementation – Residential Program

Following Commission approval, Intermountain will implement the revised Residential Program.

Fall 2021 – Impact and Process Evaluation

Intermountain will post an RFP for impact and process evaluation. The impact evaluation will focus on residential measures that have not yet been subject to an impact evaluation, such as fireplace inserts, tanked and tankless water heaters, and possibly new rebate offerings that have had good uptake. The Company will evaluate whether or not to include some commercial rebates in the impact evaluation or to postpone those for a year to allow more data to accumulate.

The process evaluation will focus on the commercial program. The process evaluation will examine the 15-month performance of the commercial program (launch in Fall 2020 to December 2021), allowing for program ramp up time and one full year of performance to evaluate.



Intermountain plans to eventually have all rebate measures evaluated on a rotating basis every 2 to 3 years. In the interim years that a measure is not being evaluated by an outside consultant, Intermountain will establish a process to internally evaluate the measures using methods similar to those employed by the consultant. This should allow the Company to identify issues or concerns with a particular measure quickly without incurring the high cost of an impact evaluation on every measure every year.

Should you have questions, concerns, or ideas to improve this plan, please contact me at (208) 377-6015.

Sincerely,

Lori A. Blattner
Director – Regulatory Affairs
Intermountain Gas Company

cc: Kathy Wold
Preston Carter