

## DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER  
COMMISSIONER RAPER  
COMMISSIONER ANDERSON  
COMMISSION SECRETARY  
COMMISSION STAFF  
LEGAL**

**FROM: JOHN R. HAMMOND JR.  
DEPUTY ATTORNEY GENERAL**

**DATE: AUGUST 27, 2020**

**SUBJECT: INTERMOUNTAIN GAS COMPANY'S APPLICATION FOR  
AUTHORITY TO IMPLEMENT A COMMERCIAL ENERGY  
EFFICIENCY PROGRAM AND FUNDING MECHANISM; CASE NO.  
INT-G-20-04.**

On August 3, 2020, Intermountain Gas Company ("Company") applied for authority to implement a Commercial Energy Efficiency Program and Funding Mechanism. The Company represents it has developed an equipment-based program for commercial customers predicated on a Conservation Potential Assessment ("CPA") performed by Dunsky Energy Consulting and input from its Energy Efficiency Stakeholder group. *Application* at 4-6.

The Company asserts the proposed Commercial Energy Efficiency Program focuses on saving measures in three end-use sectors identified in the CPA: HVAC, commercial kitchen appliances, and hot water savings. *Id.* at 6. The Company also requests authority to formalize a mechanism to recover costs incurred in the administration and delivery of the proposed Commercial Energy Efficiency Program through a proposed Rate Schedule EE – GS. *Id.* at 7. The Company also requests authority to revise existing tariffs to add a commercial component to its Energy Efficiency Program. *Id.* at 9.

The Company represents it notified its GS-1 customers about the Application through a Customer Notice and a Press Release sent to daily and weekly newspapers, and major radio and television stations in the Company's service area. *Id.* at 10. The Company requests that the Application be processed by Modified Procedure and proposes an effective date of October 1, 2020, for the Commercial Energy Efficiency Program, Energy Efficiency Charge, and other

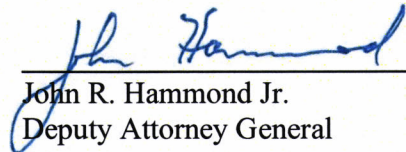
changes to associated tariffs, coincident with the effective date of the price change related to the Company's annual Purchased Gas Cost Adjustment. *Id.* at 9-10.

#### **STAFF RECOMMENDATION**

Staff recommends that the Commission issue a Notice of Application, set a 21-day intervention deadline and suspend the Company's proposed effective date for five months and 30 days under *Idaho Code* § 61-622(4) and Commission Rule of Procedure 123.03, IDAPA 31.01.01.123.03. Once the intervention deadline has passed, Staff will informally confer with the parties about further scheduling and will recommend a schedule to the Commission.

#### **COMMISSION DECISION**

Does the Commission wish to issue a Notice of Application, set a 21-day intervention deadline, and suspend the Company's requested effective date?

  
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John R. Hammond Jr.  
Deputy Attorney General

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