BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF INTERMOUNTAIN)	CASE NO. INT-G-25-05
GAS COMPANY'S APPLICATION FOR A)	
DETERMINATION OF 2024 ENERGY)	NOTICE OF APPLICATION
EFFICIENCY EXPENSES AS PRUDENTLY)	
INCURRED)	NOTICE OF INTERVENTION
)	DEADLINE
)	
)	ORDER NO. 36768
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On September 2, 2025, Intermountain Gas Company ("Company") applied to the Idaho Public Utilities Commission ("Commission") requesting an order designating \$4,466,551 of 2024 Energy Efficiency ("EE") expenditures as prudently incurred.

The Commission now issues this Notice of Application and sets deadlines for interested persons to intervene.

BACKGROUND

In 2017, the Commission authorized the Company to establish the Energy Efficiency Program ("EE Program") for its residential customers. Order No. 33757. The purpose of the EE Program "is to encourage upgrades to, or use of, high efficiency natural gas equipment." Rate Schedule EE. Later in 2017, the Company requested authority to implement a funding mechanism for the EE Program. Case No. INT-G-17-03. The Commission approved the Company's requested funding mechanism of an Energy Efficiency Charge ("EEC"), and approved Rate Schedule EE, Rate Schedule EEC, and Rate Schedule EEC-RS ("EEC-RS"). Order No. 33888.

The Commission later granted permission for the Company to implement a Commercial EE Program. Order No. 34941. This established a way to fund EE upgrades under Rate Schedule EEC-GS ("EEC-GS"). *Id.* Additionally, the Commission instructed the Company to submit an Annual Commercial EE Program Report and include representatives from the GS-1 rate class in its Energy Efficiency Stakeholder Committee ("EESC"). *Id.*

In Case No. INT-G-24-05, filed December 20, 2024, and supplemented on June, 6, 2025, the Company requested the Commission designate 2023 EE expenditures as prudently incurred. The case is currently under Commission review.

NOTICE OF APPLICATION

YOU ARE HEREBY NOTIFIED that the Company's 2024 EE Annual Report ("Annual Report") is included as Attachment 1 to the Application. The Company states the Annual Report provides a review of the Company's EE Portfolio and outlines revenues, expenditures, cost-effectiveness, and performance by measure for each program. Application at 6.

YOU ARE FURTHER NOTIFIED that the Company represents that the EE Program expenditures are funded through collections from customers via the EEC. *Id.* The Company states that the EEC-RS rate of \$0.01564 per therm was reduced to \$0.01149 effective October 1, 2024, and that the total Residential EE Program revenue for year 2024 was \$3,989,432. *Id.* The Company represents that the EEC-GS rate of \$0.0032 per therm funded the Commercial EE Program from January 1, 2024, through September 30, 2024, before being reduced by Order No. 36337 to \$0.00 due to a growing over-collection balance. *Id.* The Company represents that the Commercial EE Program revenue for 2024 was \$294,202. *Id.*

YOU ARE FURTHER NOTIFIED that the Company represents that the combined expenditures for the Residential and Commercial EE Programs for January 1, 2024, through December 31, 2024, is \$4,466,551. *Id.* at 7. The Company represents \$3,449,724, or approximately 77% of expenditures, accounts for EE Program rebates paid out to residential and commercial customers. *Id.* The Company states that it incurred \$1,016,828 in administrative expenses for labor, EE Program delivery, and special studies. *Id.*

YOU ARE FURTHER NOTIFIED that the Company states that it replaced the third-party system it previously used for its online customer application process, with an internal product that allows customers to access the rebate application from their online customer account. *Id.* at 8. The Company represents that this process reduces the need for data entry from the rebate processing team and eliminates extra steps of customer validation. *Id.*

YOU ARE FURTHER NOTIFIED that the Residential EE Program began the year with an over-funded deferral balance of \$1,352,769 and ended 2024 with a balance of \$1,027,286. *Id.* The Company states that Order No. 36337 addressed the over-funded deferral balance by reducing the EEC-RS. *Id.*

YOU ARE FURTHER NOTIFIED that the Commercial EE Program began 2024 with an over-funded deferral balance of \$891,719 and ended 2024 with an over-funded deferral balance of

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NOTICE OF APPLICATION NOTICE OF INTERVENTION DEADLINE ORDER NO. 36768 \$1,034,285. *Id.* To address the over-funded deferral balance, the Company's request to reduce the EEC-GS to \$0.00 per therm was approved by the Commission on September 30, 2024 in Order No. 36337. *Id.*

YOU ARE FURTHER NOTIFIED that the Company represents that it measures cost-effectiveness using the Utility Cost Test ("UCT") and the Total Resource Cost ("TRC"). *Id.* at 9. The Company represents that for the 2024 residential cost-testing, it used the same process utilized for the 2023 prudency evaluation cost-testing, as required by Order No. 36245. *Id.* The Company provides Exhibit No. 1 to the Application that outlines the cost-effectiveness of the different EE Programs. *Id.*

YOU ARE FURTHER NOTIFIED that the Company hosted four EESC meetings to address and discuss various EE Program topics such as the rider balance, rebate performance, promotions and outreach, and special studies. *Id.* at 10. The minutes from the four EESC meetings are included as Attachment 1, Supplement 3 to the Application.

YOU ARE FURTHER NOTIFIED that the Company represents that going forward, the Energy Service Representative will only have responsibility for Residential Program promotion and a full time EE Analyst will be dedicated to commercial customer outreach. *Id*.

YOU ARE FURTHER NOTIFIED that the Company represents that an internal audit was completed on August 25, 2025, and the Company believes the audit complies with Commission Order No. 36245. *Id.* at 11. The Company states that it will conduct the next audit in 2028. *Id.*

YOU ARE FURTHER NOTIFIED that the Application and supporting documentation are available for public inspection during regular business hours at the Commission's office. The Application is also available on the Commission's website at www.puc.idaho.gov. Click on the "NATURAL GAS" icon, select "Open Cases," and click on the case number as shown on the front of this document.

YOU ARE FURTHER NOTIFIED that all proceedings in this case will be held pursuant to the Commission's jurisdiction under Title 61 of the Idaho Code, and that all proceedings in this matter will be conducted pursuant to the Commission's Rules of Procedure, IDAPA 31.01.01.000 *et seq*.

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NOTICE OF INTERVENTION DEADLINE

YOU ARE FURTHER NOTIFIED that persons desiring to intervene in this matter to obtain parties' rights of participation must file a Petition to Intervene with the Commission pursuant to this Commission's Rules of Procedure 72 and 73, IDAPA 31.01.01.072 and -.073. Persons who wish to intervene as a party must file a Petition to Intervene no later than 21 days after the date of service of this Order. Such persons shall also provide the Commission Secretary with their email address to facilitate further communications. After the intervention deadline runs, the Commission Secretary shall issue a Notice of Parties that identifies the parties and assigns exhibit numbers to each party. Once the Notice of Parties has issued, Commission Staff shall informally confer with the Company and any intervening parties about how to further process this case and shall then report back to the Commission on a proposed case schedule.

YOU ARE FURTHER NOTIFIED that persons who would like to present their views without parties' rights of participation and cross-examination do not have to intervene but may present their views by submitting written comments to the Commission.

YOU ARE FURTHER NOTIFIED that the following people are designated as the Company's representatives in this matter:

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ORDER

IT IS HEREBY ORDERED that persons desiring to intervene in this matter must file a Petition to Intervene no later than 21 days from the service date of this Order. Once the deadline has passed, the Commission Secretary shall prepare and issue a Notice of Parties.

IT IS FURTHER ORDERED that, after the Notice of Parties has issued, Commission Staff shall confer with the parties regarding a procedural schedule for this matter including, if necessary, a hearing in this matter.

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IT IS FURTHER ORDERED that parties comply with Order No. 35375, issued April 21, 2022. Generally, all pleadings should be filed with the Commission electronically and will be deemed timely filed when received by the Commission Secretary. *See* Rule 14.02. Service between parties should continue to be accomplished electronically when possible. However, voluminous discovery-related documents may be filed and served on CD-ROM or a USB flash drive.

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 26th day of September, 2025.

EDWARD LODGE, PRESIDENT

HN R. HAMMOND JR., COMMISSIONER

DAYN HARDIE, COMMISSIONER

ATTEST:

Laura Calderon Robles

Interim Commission Secretary

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