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IDAHO PUBLIC
UTILITIES COMMISSION

JULIA A. HILTON
Corporate Counsel
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October 2, 2013

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

Re: Case No. IPC-E-13-14
Continuation of Demand Response Programs – Idaho Power Company's
Motion to Approve Settlement Agreement

Dear Ms. Jewell:

Enclosed for filing in the above matter are an original and seven (7) copies of Idaho Power Company's Motion to Approve Settlement Agreement.

Very truly yours,



Julia A. Hilton

JAH:evp
Enclosures

JULIA A. HILTON (ISB No. 7740)
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IDAHO PUBLIC UTILITIES COMMISSION

Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	
CONTINUATION OF IDAHO POWER)	CASE NO. IPC-E-13-14
COMPANY'S A/C COOL CREDIT,)	
IRRIGATION PEAK REWARDS, AND)	IDAHO POWER COMPANY'S
FLEXPEAK DEMAND RESPONSE)	MOTION TO APPROVE
PROGRAMS FOR 2014 AND BEYOND)	SETTLEMENT AGREEMENT
)	

COMES NOW, Idaho Power Company ("Idaho Power" or "Company") and hereby moves the Idaho Public Utilities Commission ("Commission") pursuant to RP 56, 256, and 274 to approve the enclosed Settlement Agreement on or before January 1, 2014. This Motion is based on the following:

1. In Docket Nos. IPC-E-12-29 and IPC-E-13-04, Idaho Power filed for changes to its A/C Cool Credit program, Irrigation Peak Rewards program, and FlexPeak Management program (collectively "DR Programs"). These filings were prompted by the Load and Resource Balance Analysis performed during the development of Idaho Power's 2013 Integrated Resource Plan which does not project any peak-hour capacity deficits until 2016.

2. In Order No. 32776, the Commission approved a stipulation entered into by parties to IPC-E-12-29, including Idaho Irrigation Pumpers Association (“IIPA”), the Idaho Conservation League (“ICL”), Snake River Alliance (“SRA”), and the Idaho Public Utilities Commission Staff (“Commission”). That stipulation described terms for the temporary suspension of the A/C Cool Credit Program and Irrigation Peak Rewards Program (Phase I). It also requested that the Commission schedule a prehearing conference to set a schedule for workshops and a procedural schedule so that parties and stakeholders could evaluate changes for Idaho Power’s DR Programs for the 2014 program season and beyond (Phase II).

3. In Order No. 32805, the Commission approved temporary changes to the FlexPeak Management program and directed that public workshops address how to continue the FlexPeak program in the future.

4. In Order No. 32823, the Commission opened a new docket in this case and set an informal prehearing conference to further evaluate Idaho Power’s DR Programs for the 2014 program season and beyond. In keeping with its previous orders, the Commission ordered that IIPA, ICL, and SRA were designated as intervening parties in this case. Petitions to intervene in this proceeding were filed by the Industrial Customers of Idaho Power (“ICIP”) and EnerNOC, Inc. (“EnerNOC”). The Commission granted those petitions in Order No. 32828.

5. Following the June 12, 2013, prehearing conference, the parties set a schedule for four workshops, which were held on July 10, July 23, August 7, and August 19. During the August 19, 2013, workshop the parties agreed to an additional workshop on August 27, 2013, which included settlement discussions that occurred pursuant to

RP 272. The testimony of Tami White describes the workshop process in greater detail, a copy of which is enclosed as Attachment No. 1.

6. Based upon these workshops held on July 10, July 23, August 7, August 19, and August 27 and settlement discussions that occurred pursuant to RP 272 on August 27, 2013, several parties, including Idaho Power, Commission Staff, IIPA, ICL, SRA, EnerNOC, and non-party Mike Seaman¹ (“Signing Parties”) agreed to resolve and settle issues related to the reinstatement of Idaho Power’s DR Programs for 2014 and beyond. A copy of the signed Settlement Agreement evidencing the settlement is enclosed as Attachment No. 2. The Signing Parties believe the settlement is in the public interest and recommend that the Commission approve the Settlement Agreement and all of its terms and conditions without material change or condition pursuant to RP 274.

5. Program modifications identified in the Settlement Agreement are reflected in clean and legislative formats for Tariff Schedule 23 (Irrigation Peak Rewards Program) and Tariff Schedule 81 (Residential Air Conditioner Cycling Program), both of which are enclosed as Attachment No. 3. The Signing Parties recommend the Commission issue its order approving these tariffs no later than January 1, 2014.

NOW, THEREFORE, the Signing Parties respectfully request that the Commission issue an order in Case No. IPC-E-13-14:

1. Granting the Motion to accept Attachment No. 2, the Settlement Agreement, in its entirety, without material change or condition;

¹ Mike Seaman authorized the Company to use the electronic signature format of “/S/ Mike Seaman.”

2. Acknowledging that the Company will be able to recover otherwise prudent expenditures made under this Settlement Agreement, even though such expenditures may not be cost-effective by traditional measures in the short or long-term; and

3. Authorizing revised tariff schedules with an effective date of January 1, 2014.

Respectfully submitted this 2nd day of October 2013.



JULIA A. HILTON
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of October 2013 I served a true and correct copy of the within and foregoing IDAHO POWER COMPANY'S MOTION TO APPROVE SETTLEMENT AGREEMENT, upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff

Karl Klein
Deputy Attorney General
Idaho Public Utilities Commission
472 West Washington (83702)
P.O. Box 83720
Boise, Idaho 83720-0074

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Idaho Irrigation Pumpers Association, Inc.

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Elizabeth Paynter, Legal Assistant

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-13-14

IDAHO POWER COMPANY

ATTACHMENT 1

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)
CONTINUATION OF IDAHO POWER)
COMPANY'S A/C COOL CREDIT,) CASE NO. IPC-E-13-14
IRRIGATION PEAK REWARDS, AND)
FLEXPEAK DEMAND RESPONSE)
PROGRAMS FOR 2014 AND BEYOND)
_____)

IDAHO POWER COMPANY
TESTIMONY IN SUPPORT OF SETTLEMENT AGREEMENT
OF
TAMI WHITE

1 Q. Please state your name and business address.

2 A. My name is Tami White and my business address
3 is 1221 West Idaho Street, Boise, Idaho 83702.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by Idaho Power Company ("Idaho
6 Power" or "Company") as the Senior Manager of Rate Design
7 in the Regulatory Affairs Department.

8 Q. Please describe your educational background.

9 A. I earned a Bachelor of Business Administration
10 degree in Accounting from California State University,
11 Stanislaus. I have attended various electric utility
12 courses, including "Electric Utility System Operation," a
13 course offered through Professional Training Systems, Inc.,
14 and "Overview of System Operations" presented by the
15 Western Electricity Coordinating Council.

16 Q. Please describe your work experience with
17 Idaho Power.

18 A. I began my employment with Idaho Power in 1999
19 as a Financial Analyst in the Company's Delivery Finance
20 Support area where I provided accounting and financial
21 support services to the Delivery Business Unit. In 2005, I
22 was promoted to Finance Team Leader where I was responsible
23 for leading a group of Financial Analysts, Accountants, and
24 Accounting Specialists in providing accounting and
25 financial support services to the Operations Business Unit.

1 I was responsible for all aspects of the monthly accounting
2 closing process for the Operations Business Unit and for
3 the monthly billing and settlements processes for
4 transmission sales and purchases, wholesale energy
5 transactions, Public Utility Regulatory Policies Act of
6 1978 (PURPA) transactions, large special contracts, and
7 joint use transactions. While working in Operations
8 Finance Support, I was involved in the development of the
9 Company's Federal Energy Regulatory Commission ("FERC")
10 Open Access Transmission Tariff ("OATT") formula rate for
11 transmission services.

12 In October of 2010, after 11 years in finance, I
13 accepted a position as Manager of FERC and Regional Affairs
14 in the Regulatory Affairs department. In this position I
15 was responsible for managing regulatory activities such as
16 the preparation and filing of Idaho Power's OATT rates for
17 transmission service, supervising participation and
18 settlement negotiations of Bonneville Power Administration
19 rate cases, and creating analyses that form the basis for
20 Idaho Power's FERC regulatory strategy.

21 In January of 2012, I was promoted to Senior Manager
22 of Rate Design. As Senior Manager of Rate Design, I
23 oversee the Company's rate design activities such as
24 regulatory ratemaking and compliance filings, tariff

25