

To: Idaho Public Utilities Commission
From: Carol Gabbard-Kuna, Idaho
Public Comments regarding
Case #IPC-E-02-13

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In the matter of Idaho Power Company's Application for authority to implement a residential air conditioner cycling pilot program and tariff schedule 81

IDAHO PUBLIC
UTILITIES COMMISSION

While I applaud Idaho Power's efforts at conservation and cost containment, I am opposed to the residential air conditioner cycling pilot program for a number of reasons.

1. Even though this is a voluntary program, history has shown that voluntary and temporary soon become mandatory and permanent. Examples of this would be seat belts and sales tax. I personally would not be pleased with Idaho Power or any other company for that matter being in control of my comfort or spending. The application states that the program has an expiration date of September 30, 2004, "unless extended by the Company." Does the Idaho Public Utilities Commission have final authority on the extension?
2. According to the application the company will be in total control of the selection of the participants. Will any organization outside Idaho Power be overseeing this step in the process? If there is no oversight of the selection process what measures will be in place to keep the company from stacking the deck in order to receive the company's desired outcome? The company could easily select their employees as "volunteers".
3. The \$5.00 monthly credit hardly seems like a fair trade-off for the customer's inconvenience and comfort even with the programmable thermostat thrown in to sweeten the deal.
4. What makes up the \$820,000.00 estimated cost? 500 customer's @ \$5.00 a month for 3 months for 2 years equates to \$15,000.00. 100 programmable thermostats @ \$100.00 each equates to \$50,000.00. That adds up to \$65,000.00. What is the remaining \$775,000.00 going to be used for? The cost of this program seems excessive to me.
5. It's not clear how the effectiveness of this program will be assessed. Will there be other household groups to use for comparison? Will there be a group selected that volunteers to adjust their thermostats to reduce their usage during the peak times? Will there be a group selected at random that does nothing? What stats will the company be using to do a comparison? Or will there be no comparison? The company seems to be in control of the effectiveness rating.
6. What really happens during the 4 hour cycling time frame? Does the company turn off the customers AC for 4 hours at a time? Does the company turn the thermostat off and on for a set amount of minutes? If so, doesn't that reduce the life of the air conditioning unit? Does the thermostat stay off until the household temperature reaches a certain degree? And if so, what will the specified temperature be 80, 85, 90, or whatever the company decides for that day? If the customer's air conditioning is turned off until 9:00 p.m. how long will it take to return the house's temperature down to a comfortable sleeping degree?
7. What's prior notice? The customer has to give notice by 4:00 p.m. and can only "opt out" one day a month. The company has no such requirements for coming into the customer's house.
8. If a customer chooses to terminate their participation after the first complete cycle, will the company remove the sensor and show the customer how to program the thermostat at no charge?
9. If programmable thermostats have been shown to reduce energy usage, why doesn't the company offer a program for customers to buy them from the company with installment payments and possibly credits to the customer's bills for reduced power usage during summer months?

Until Idaho Power can satisfactorily answer these questions and any additional questions that customers may have I respectfully request that the Idaho Public Utilities Commission deny this application.