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IDAHO PUBLIC UTILITIES COMMISSION

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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
IDAHO POWER COMPANY FOR APPROVAL)	CASE NO. IPC-E-14-02
OF ITS AGREEMENT WITH ENERNOC, INC.)	
TO IMPLEMENT AND OPERATE A)	
VOLUNTARY COMMERCIAL DEMAND)	COMMENTS OF THE
RESPONSE PROGRAM)	COMMISSION STAFF
)	
)	

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Weldon B. Stutzman, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 33007 on April 2, 2014, submits the following comments.

BACKGROUND

On March 7, 2014, Idaho Power Company filed a Petition requesting approval of the third amendment to the Company's Agreement with EnerNOC, Inc. EnerNOC pursuant to the Agreement provides a demand response program for Idaho Power's commercial and industrial customers, identified as its Flex Peak Management Program. The objective of the Flex Peak Program is to reduce demand on Idaho Power's system during peak load times through customers' voluntary reduction in electrical use. EnerNOC is responsible for developing and