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IDAHO PUBLIC UTILITIES COMMISSION

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BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
IDAHO POWER COMPANY FOR A)	CASE NO. IPC-E-14-04
DETERMINATION OF 2013 DEMAND-SIDE)	
MANAGEMENT (“DSM”) EXPENSES AS)	COMMENTS OF THE INDUSTRIAL
PRUDENTLY INCURRED)	CUSTOMERS OF IDAHO POWER
)	
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)	

COMES NOW, The Industrial Customers of Idaho Power, (“ICIP”) and pursuant to Rule 203 of the Rules of Procedure of the Idaho Public Utilities Commission (the “Commission”) and the Commission’s Notice of Application and Notice of Modified Procedure issued on April 30, 2014, and provides the following Comments.

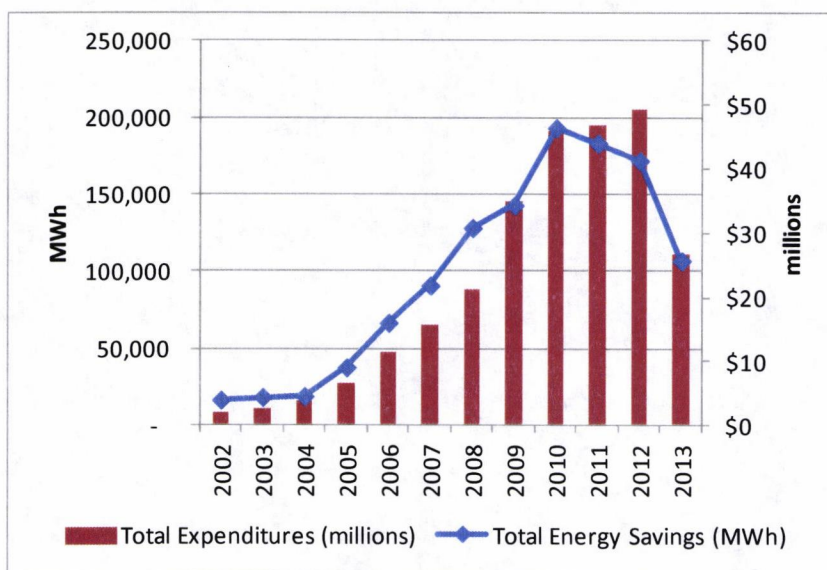
Idaho power Company (“Idaho Power” or the “Company”) seeks approval for designating Idaho Power’s expenditures of \$21,748,331 of Idaho Energy Efficiency Rider (“Rider”) funds and \$4,203,155 of demand response (“DR”) program incentives included in the 2014 Power Cost Adjustment (“PCA”), for a total of \$25,951,486, as prudently incurred demand-side management (“DSM”) espenses. These expenses are pursuant to reporting requirements included in Commission Order No. 29419 and in accordance with agreed upon

guidelines set forth in the Memorandum of Understanding for Prudency Determination of DSM Expenditures (“MOU”).

Idaho Power DSM Programs and Expenditures

Chart One below depicts the Company’s conservation expenses and savings since 2002.

CHART ONE¹



As can be seen in the above Chart One, both DSM savings and expenditures have fallen precipitously since 2010. Expenses have fallen by 41% or \$19 million, and MWh savings have fallen by 45% or 86,000 MWh. While total expenses and savings have fallen, the cost per MWh for savings has actually increased by six percentage points since 2010.

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¹ Source: Idaho Power, DSM 2013 Annual Report, pages 5 – 6; Fig. 1-4.