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Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF IDAHO POWER'S )  
APPLICATION FOR A DETERMINATION OF ) CASE NO. IPC-E-14-04  
2013 DEMAND SIDE MANAGEMENT (DSM) )  
EXPENSES AS PRUDENTLY INCURRED )  
)  
) COMMENTS OF THE  
) COMMISSION STAFF  
)**

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**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Neil Price, Deputy Attorney General, and in response to the Notice of Application, Notice of Modified Procedure, and Notice of Intervention Deadline in Order No. 33032 issued on April 30, 2014, submits the following comments.

**BACKGROUND**

On March 17, 2014, Idaho Power Company ("Idaho Power" or "Company") submitted its Demand-Side Management 2013 Annual Report (DSM 2013 Annual Report) and makes Application to the Idaho Public Utilities Commission (Commission) for an Order designating Idaho Power's expenditures of \$21,748,331 in 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