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IDAHO PUBLIC  
UTILITIES COMMISSION

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Attorney for Petitioner NW Energy Coalition

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE INVESTIGATION )  
OF FINANCIAL DISINCENTIVES TO )  
INVESTMENT IN ENERGY EFFICIENCY BY )  
IDAHO POWER COMPANY )  
\_\_\_\_\_ )

Case No. IPC-E-04- 15

**PETITION**

In compliance with Order No. 29505 (Case No. IPC-E-03-13), and pursuant to Rules of Procedure 33 and 53 (IDAPA 31.01.01.033 and .053), NW Energy Coalition hereby petitions the Idaho Public Utilities Commission to initiate workshop proceedings to investigate financial disincentives which hinder Idaho Power's investments in cost-effective energy efficiency resources. See Order 29505 at pp. 68-69.

Petitioner **NW Energy Coalition** is a non-profit organization incorporated in Washington, which promotes energy conservation and renewable energy resources, consumer and low-income protection, and fish and wildlife restoration on the Columbia and Snake Rivers. NW Energy Coalition has numerous organizational and individual members in Idaho, and was an intervenor in the 2003-2004 Idaho Power general rate case (Case No. IPC-E-03-13).

## SUPPORTING POINTS AND AUTHORITIES

Order No. 29505 provided, in relevant part:

The Commission has determined that a proceeding to assess financial disincentives inherent in Company-sponsored conservation programs is appropriate and should proceed by informal workshops. The Commission specifically directs the parties to address possible revenue adjustment when annual energy consumption is both above and below normal. The parties should also consider how much adjustment is necessary to remove DSM investment disincentives and whether (and to what extent) performance-based incentives such as revenue sharing could or should be incorporated into the resolution of this issue. The Commission is interested in proposals that could provide Idaho Power the opportunity to share and retain benefits gained from efficiencies, especially where efficiencies are derived from innovation and the use of new technologies. . . . In short, the Commission believes opportunities exist for improvements in operating efficiency that would benefit the Company shareholders and its customers, and we encourage the parties to creatively consider the options for a performance based mechanism to present to the Commission. The parties to the agreement are directed to propose a workshop schedule and initiate a proceeding.

Order 29505 at pp. 68-69.<sup>1</sup>

Counsel for NW Energy Coalition has conferred with Staff, Idaho Power, and the Industrial Customers of Idaho Power (ICIP) to obtain agreement on workshop timing and procedures. NW Energy Coalition, Staff, Idaho Power Company, and ICIP agree to proceed as follows:

A series of three (3) informal workshops is anticipated, to be concluded by December 15, 2004. The first workshop will be held starting at **9:30 AM until approximately 12:30 PM on August 24, 2004**, at Idaho Power Company, 1221 West Idaho Street, Boise, Idaho. Dates and locations for further workshops will be determined

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<sup>1</sup> While the Commission's Order spoke directly to removing barriers to efficiency investment, NW Energy Coalition believes the same principles apply to investment in clean distributed generation.

at this initial meeting. NW Energy Coalition will provide direct notice of such workshops to all parties to case number IPC-E-03-13.

Idaho Power Company has generously agreed to underwrite the costs of a facilitator for the workshops. In order to advance discussions, Idaho Power Company has also agreed to circulate a "white paper" analysis of the issues identified by the Commission in Order No. 29505 to Staff, NW Energy Coalition, and ICIP (and other parties who may request the analysis), by July 24, 2004.

Apart from the initiation of this new proceeding, no specific actions or orders are requested of the Commission at this time. If no party seeks specific actions or orders of the Commission by December 15, 2004, NW Energy Coalition will provide a status report to the Commission no later than that date to update the Commission on the status of the investigative workshops.

#### CONCLUSION

NW Energy Coalition requests the Commission grant this Petition to initiate the investigative proceeding as described in Order 29505, and as set forth above.

Dated: June 18, 2004

Respectfully submitted,



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William M. Eddie  
On behalf of NW Energy Coalition

## CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of June 2004, true and correct copies of the foregoing PETITION were delivered to the following persons via hand delivery (for Commission and Idaho Power recipients) and U.S. Mail (for all others):

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