

Brad M. Purdy
 Attorney at Law
 Bar No. 3472
 2019 N. 17th St.
 Boise, ID. 83702
 (208) 384-1299
 FAX: (208) 384-8511
bmpurdy@hotmail.com
 Attorney for Intervenor
 Community Action Partnership
 Association of Idaho

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 IDAHO PUBLIC
 UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
 OF IDAHO POWER COMPANY FOR AUTHORITY) CASE NO. IPC-E-08-10
 TO INCREASE ITS RATES AND CHARGES)
 FOR ELECTRIC SERVICE TO ELECTRIC) COMMUNITY ACTION
 CUSTOMERS IN THE STATE OF IDAHO) PARTNERSHIP ASSOC-
) TIATION OF IDAHO'S
) RESPONSE TO IDAHO
) POWER'S PETITION FOR
) RECONSIDERATION AND/OR
) CLARIFICATION

COMES NOW, the Community Action Partnership Association of Idaho ("CAPAI")
 and in response to the Petition for Reconsideration and/or Clarification, states as follows.

I. BACKGROUND

In final Order No. 30722 issued in this case on January 30, 2009, the Commission ordered Idaho Power Company to fund the five CAP agencies operating in Idaho Power's service territory \$25,000.00 each for a total funding of \$125,000.00 to provide low-income energy efficiency education.

Idaho Power does not oppose this Order but seeks clarification on two points. *Petition at pp 21-23.* The first issue is whether funding should come from the Company's general rates or through its Energy Efficiency Rider. The Company states that it has no preference but simply seeks clarification.

CAPAI notes that the low-income energy efficiency education program approved by the Commission is unique and does not lend itself as well to a direct comparison to other DSM programs. Furthermore, Idaho Power's Weatherization Assistance for Qualifying Customers ("WAQC") is funded through general rates and for the reasons stated above, CAPAI proposes that the energy efficiency education program be funded through the same means.

The Company further notes, and CAPAI agrees, that this approach would require a corresponding adjustment to its overall revenue requirement to account for the \$125,000.00.

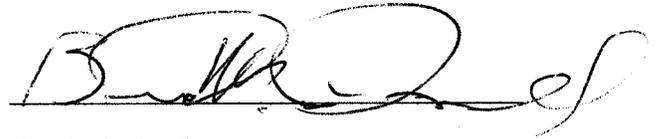
Second, Idaho Power seeks clarification regarding whether each of the five CAP agencies should necessarily be given equal funding levels (i.e., \$25,000.00 each) in light of the fact that not all CAP agencies serve the same number of customers. This, the Company contends, would not result in an equal distribution of the overall funds. Consequently, Idaho Power requests that the Commission authorize the Company to spend the funds on a per capita customer basis rather than simply splitting the total funding level into five equal parts.

CAPAI agrees with Idaho Power's contention and proposal to fund the CAP agencies on a pro rata basis that reflects the number of customers located within their respective areas receiving or applying for LIHEAP and/or Project Share assistance and welcomes a collaborative effort with the Company, Commission Staff and other parties to ensure that the issues raised by Idaho Power's Petition are properly addressed and implemented.

Finally, Idaho Power seeks permission to ensure that the funding is not fuel-blind, which is to say that it only be made available to customers whose primary heating source is electricity. Again, CAPAI does not object to this criterion and will collaborate with the Company to ensure that the program only be made available to customers with electricity as

their primary heating source. To the extent that CAPAI already provides conservation education outside the context of this newly approved program, then the CAP agencies will continue their efforts in that regard.

DATED, this 27th day of February, 2009.

A handwritten signature in black ink, appearing to read 'Brad M. Purdy', written over a horizontal line.

Brad M. Purdy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 27th day of February, 2009, I caused to be served the foregoing COMMUNITY ACTION PARTNERSHIP ASSOCIATION OF IDAHO'S RESPONSE TO IDAHO POWER COMPANY'S PETITION FOR RECONSIDERATION AND/OR CLARIFICATION via email. Hard copy via U.S. Mail will follow.

Weldon Stutzman
Deputy Attorney General
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702
weldon.stutzman@puc.idaho.gov

BARTON L. KLINE, ISB #1526
LISA D. NORDSTROM, ISB #5733
DONOVAN E. WALKER, ISB #5921
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
Telephone: (208) 388-2682
Facsimile: (208) 388-6936
bkline@idahopower.com
lnordstrom@idahopower.com
dwalker@idahopower.com

John R. Gale
Vice President, Regulatory Affairs
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
rgale@idahopower.com

Industrial Customers of Idaho Power
c/o Peter J. Richardson
Richardson & O'Leary
515 N. 27th St
P.O. Box 7218
Boise, Idaho 83702
Telephone: (208) 938-7901
Fax: (208) 938-7904
peter@richardsonandoleary.com

Dr. Don Reading
6070 Hill Road
Boise, Idaho 83703

(208) 342-1700 Tel
(208) 384-1511 Fax
dreading@mindspring.com

Randall C. Budge
Eric L. Olsen
Racine, Olson, Nye, Budge &
Bailey, Chartered
P.O. Box 1391; 201 E. Center
Pocatello, Idaho 83204-1391
Telephone: (208) 232-6101
Fax: (208) 232-6109
rcb@racinelaw.net
elo@racinelaw.net

Anthony Yankel
29814 Lake Road
Bay Village, Ohio 44140
Fax: 440-808-1450
tony@yankel.net

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
BOEHM, KUTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Telephone: 513-421-2255 Facsimile: 513-421-2764
E-mail: mkurtz@BKLawfrm.com
kboehm@BKLawfrm.com

Kevin Higgins
Energy Strategies, LLC
Parkside Towers
215 South State Street, Suite 200
Salt Lake City, Uta 84111
E-mail: khiggins@energystrat.com

Conley E. Ward
Givens Pursley, LLP
601 W. Bannock St.
P.O. Box 2720
Boise, ID 83701-2720
cew@givenspursley.com

Dennis Peseau, PhD

Utility Resources, Inc.
1500 Liberty St. SE, Suite 250
Salem, OR 97302
dennytemp@yahoo.com

Arthur Bruder
Office of General Counsel
U.S. Department of Energy
1000 Independence Ave., SW
Washington DC, 20585
Arthur.Bruder@hg.doe.gov

Ken Miller
Snake River Alliance
P.O. Box 1731
Boise, ID 83701
kmiller@snakeriveralliance.org



Brad M. Purdy