

✓ Ken Barker
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Jean Jewell

From: kmiller@snakeriveralliance.org
Sent: Thursday, February 05, 2009 9:15 AM
To: Jean Jewell; Beverly Barker; Gene Fadness; Ed Howell
Subject: PUC Comment Form

A Comment from Ken Miller follows:

Case Number: IPC-E-08-11
Name: Ken Miller
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Contact E-Mail: kmiller@snakeriveralliance.org Name of Utility Company: Idaho Power Add to Mailing List: no

Please describe your comment briefly:
This comment was also faxed to the PUC.

Feb. 5, 2009

TO: Jean Jewell
Idaho Public Utilities Commission Secretary
472 West Washington
Boise, ID 83702

FROM: Ken Miller
Snake River Alliance
Box 1731
Boise, ID 83701
Ph: (208) 344-9161

RE DOCKET IPC-E-08-11: IN THE MATTER OF THE APPROPRIATE DISPOSITION OF IDAHO POWER COMPANY'S SO2 EMISSION PROCEEDS TO FUND AN ENERGY EDUCATION PROPOSAL

Dear Ms. Jewell:

Please accept the following comments on behalf of the Snake River Alliance relative to the Commission's docket, IPC-E-08-21.

The Snake River Alliance is an Idaho-based non-profit organization established in 1979 to address Idahoans' concerns about nuclear safety issues. In early 2007, the Alliance expanded the scope of its mission by launching its Clean Energy Program. The Alliance's energy initiative includes advocacy for renewable energy resources in Idaho; expanded conservation and demand-side management programs offered by Idaho utilities and the Bonneville Power Administration; and local, state, regional, and national policies and initiatives that promote sustainable and affordable energy policies. The Alliance is pursuing these programs on behalf of its members, many of whom are customers of Idaho's regulated utilities, who are interested in promoting clean and affordable energy initiatives.

The Alliance appreciates the efforts by the Public Utilities Commission's interest in this unique docket, and the willingness by Commissioners and PUC staff to consider the multiple

proposals before it with regard to the most effective use of the SO2 emissions proceeds at issue. It is our hope that, as additional SO2 allowances are sold, the Commission will continue to consider using a portion of the proceeds to further fund and develop energy education initiatives such as that proposed by the Idaho Energy Education Project (IEEP). The Alliance also recognizes and appreciates the efforts put into this docket by PUC staff, IEEP, Idaho Power Co., the Idaho Office of Energy Resources, and the Department of Education.

The Alliance has supported the proposals advanced by IEEP since the initiation of this docket. We consider it of paramount importance that, given the amount of money available, the energy education initiatives to be funded through this docket have the least amount of overhead or administrative costs as possible, and that students be involved in these programs to the maximum amount possible.

While the Alliance appreciates the suggestions advanced by the Office of Energy Resources (OER) and the Department of Education (DOE), we are concerned about the level of administrative costs as well as the amount of funds that would be targeted for curriculum development, given that much of the education material is already available.

The Alliance was impressed by Idaho Power's Jan. 9 presentation and all three of the concepts advanced by the Company. We believe Concept 1, expanding mini home audits for students, is creative and has significant educational possibilities. Likewise, Concept 2, which would allow students to actively participate in putting the results of energy audits to use and also to use regional workshops to train students and teachers, is a sound idea and well worth exploring. While we agree that Concept 3 (Solar4RSchools) is a very good idea, we believe those funds might be better used to support the first two Concepts. An alternative might be to explore ways to expand participation in the existing Solar4RSchools program and to pursue the ideas contained in Concept 3 with such entities as the Bonneville Environmental Foundation.

As important as the programs are, the Alliance agrees with IEEP that it is equally important that an advisory committee, the framework for which can be established by the Commission as part of this docket, should be established to monitor the programs. While we recognize these programs are a logical extension of much of the demand-side management efforts already in place at Idaho Power, we believe such an advisory committee is best suited to accept and screen proposals by schools or school districts, working in concert with the Company. Such an advisory panel (which needn't add to existing bureaucracy and which was referred to by IEEP as an "Idaho Energy Education Board") would also be ideally suited to review the performance of the programs to ensure they are accomplishing what they were designed to do.

In summary, the Alliance has long been impressed by the creativity and enthusiasm shown by Mr. Bill Chisholm and IEEP, and we believe IEEP should be a key component to the execution of these energy education programs. At a minimum, should Idaho Power's concepts be adopted in whole or in part by the Commission, we would urge the Commission to include in its order some sort of reporting requirement to the entity charged with executing these programs. Such a report and evaluation would be helpful in determining whether the programs are effective, and also in identifying other possible programs that could be implemented should additional funds become available.

As mentioned above, the Alliance also urges the Commission to consider using a portion of future SO2 allowance sales proceeds to continue some level of funding for these energy education and participatory programs. It is probable that additional proceeds will be generated by future allowance sales, and the Alliance agrees with the Commission's order addressing the distribution of these proceeds on the customary 90-10 split similar to that employed in PCA cases.

Respectfully submitted,

Ken Miller
Clean Energy Program Director
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The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 70.102.111.178
