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May 1, 2009

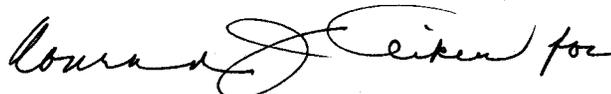
Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
PO Box 83720  
Boise, Idaho 83720-0074

Re: Case No. IPC-E-0<sup>9</sup>~~8~~-05

Dear Ms. Jewell:

Enclosed for filing in the captioned matter, please find the original and seven (7) copies of *Idaho Irrigation Pumpers Association, Inc.'s Comments* in the above matter.

Sincerely,



ERIC L. OLSEN

ELO:nj  
Enclosures  
cc: Service List

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IDAHO PUBLIC UTILITIES COMMISSION

ORIGINAL

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IDAHO PUBLIC  
UTILITIES COMMISSIO

Attorneys for Idaho Irrigation Pumpers Association, Inc.

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION	)	
OF IDAHO POWER COMPANY FOR	)	CASE NO. IPC-E-09-05
AUTHORITY TO REVISE THE ENERGY	)	
EFFICIENCY RIDER, TARIFF SCHEDULE 91	)	
_____	)	

**IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.'S COMMENTS**

IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. ("IIPA"), by and through its attorneys, hereby respectfully submits following comments with respect Idaho Power Company's ("IPC") proposed increase in the Energy Efficiency Rider.

**COMMENTS**

In Order 30717, the Commission just approved significant changes to the Irrigation Peak Reward Program through authorizing a new dispatchable curtailment option. This new program is expected to increase the avoided summer peak demand under this program from the 35 MW that was realized in 2008 to approximately 230 MW by 2011. Tatum Dir., p 11, ls 7-11. If the success of the dispatchable program on the Rocky Mountain Power system is any indication, IPC's avoided demand estimates may be fairly conservative given the fact that the irrigation class on IPC's system is almost twice the size of that on the Rocky Mountain Power system. With this and the continued expansion of other demand response programs as outlined in IPC's Demand-Side

Management Annual Report 2008, IPC will be able to continue to partner with its customers to help meet the growing demands on its electrical system.

However, just like any other system resource, be it supply side or demand side, there are costs associated with the acquisition of these resources. The IIPA recognizes that a large portion of the increases in IPC's projected DSM program expenditures relates to the implementation of the changes to the Peak Rewards Program. The avoided summer peak demand under the Peak Rewards Program or the A/C Cool Credit benefits the whole system by avoiding or deferring the acquisition of other higher cost system resources. *See Tatum Dir., p. 11, ls 14-20.* As such, it is important for the Commission and IPC's customers to continue to support these cost effective DSM Programs.

The IIPA supports the adoption of IPC's proposed increase in the Energy Efficiency Rider as set forth in its Application in this matter.

DATED this 1<sup>th</sup> day of May, 2009.

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

By  for  
ERIC L. OLSEN, Attorney for  
Idaho Irrigation Pumpers Assn., Inc.

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on this 1<sup>st</sup> day of May, 2009, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

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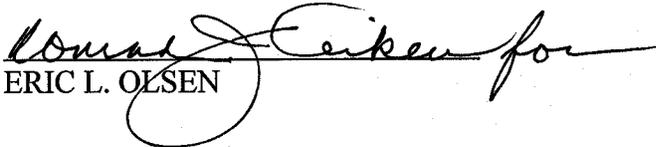
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