

May 18, 2008

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

FROM: Ken Miller
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IDAHO PUBLIC
UTILITIES COMMISSION

**RE DOCKET IPC-E-09-07: IDAHO POWER COMPANY'S APPLICATION FOR
AUTHORITY TO INCREASE ITS RATES DUE TO THE INCLUSION OF ADVANCED
METERING INFRASTRUCTURE ("AMI") INVESTMENT IN RATE BASE**

COMMENTS FROM THE SNAKE RIVER ALLIANCE

Dear Ms. Jewell:

Please accept the following comments on behalf of the Snake River Alliance (SRA) relative to the Commission's docket, IPC-E-09-07.

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 efficiency programs offered by Idaho utilities and the Bonneville Power Administration; and local, state, regional, and national policies and initiatives that advance sustainable and affordable energy policies. The Alliance pursues these programs on behalf of its members, many of whom are customers of Idaho Power Company.

The Alliance supports Idaho Power's request to include the Advance Metering Infrastructure ("AMI") investment in the rate base. While we appreciate that the benefits to be realized from the AMI technology will not be realized until well after the meters are deployed across Idaho Power's service territory, we agree with Idaho Power and the Commission that installation of the new meters must be a priority.

We remain concerned that the number and cost of capital projects in front of Idaho Power could possibly delay the timely AMI deployment, and urge the Commission to guard against schedule creep that could drag the process out beyond the Company's timeline.

And while the Alliance is keenly sensitive to the impacts rate basing AMI will have on Idaho Power customers, we view this investment as sound and believe the eventual benefits will lead to

real energy savings that will benefit all customers both through reduced energy bills and a reduced need for additional investments in new generation and transmission infrastructure.

Finally and on a related note: The Alliance commends Idaho Power for its attempts to convey to customers the merits of the AMI program. However, we believe the Company can do more to help its customers better understand how to interpret the data on the face of their new meters. While this is a small issue, we have heard from our members asking how to read the digital data flashing on their meters. The old meters were not the easiest to read for the typical customer, but at a minimum they had some feedback by observing the pace at which the dial moved. The new meters are somewhat more difficult to decipher – at least in ways that are readily understandable to the typical consumer. Any efforts by Idaho Power to enable its customers to better comprehend the data presented on the meters will be welcome.

The Alliance once again appreciates the attention the Commission has given this matter, and the efforts the Company have made to comply with the Commission's call for a swift implementation of AMI in its service territory. We look forward to the time when AMI will allow for more meaningful consumption and price signals to be conveyed to Idaho Power consumers.

If you have questions about these comments, please do not hesitate to contact me or the Alliance at (208) 344-9161.

Respectfully submitted,

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cc via e-mail: Donovan E. Walker and Barton L. Kline, Idaho Power Company
Courtney Waites and Greg Said, Idaho Power Company