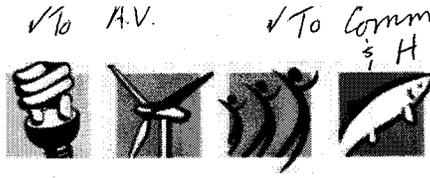


3TIER Environmental Forecast Group
 Advocates for the West
 Alaska Housing Finance Corporation
 Alliance to Save Energy
 Alternative Energy Resources Organization
 American Rivers
 The Apollo Alliance
 Audubon Washington
 Avista Utilities
 BC Sustainable Energy Association
 Bonnaville Environmental Foundation
 Central Area Motivation Program
 Citizens Utility Board of Oregon
 City of Ashland
 Clackamas County Weatherization
 Climate Solutions
 The Climate Trust
 Community Action Partnership of Oregon
 Community Action Partnership Assoc. of Idaho
 Conservation Services Group
 David Suzuki Foundation
 Earth and Spirit Council
 Earth Ministry
 Ecos Consulting
 Ecological Design Center
 eFormative Options, LLC
 Emerald People's Utility District
 The Energy Project
 Energy Trust of Oregon, Inc.
 eXeo Development Corporation
 Environment Oregon
 Environment Washington
 Eugene Water & Electric Board
 Friends of the Earth
 Golden Eagle Audubon Society
 Horizon Wind Energy
 Home Performance Washington
 Housing and Comm. Services Agency of Lane Co.
 Human Resources Council, District XI
 Iberdrola Renewables
 Idaho Conservation League
 Idaho Rivers United
 Idaho Rural Council
 Idaho Wildlife Federation
 Interfaith Network for Earth Concerns
 Kootenai Environmental Alliance
 League of Utilities and Social Service Agencies
 League of Women Voters - ID, OR & WA
 Metrocenter YMCA
 Missoula Urban Demonstration Project
 Montana Audubon
 Montana Environmental Information Center
 Montana Public Interest Research Group
 Montana Renewable Energy Association
 Montana River Action
 Montana Trout Unlimited
 The Mountaineers
 Multnomah County Weatherization
 National Center for Appropriate Technology
 Natural Resources Defense Council
 New Buildings Institute
 Northern Plains Resource Council
 Northwest Energy Efficiency Council
 Northwest Solar Center
 NW Natural
 NW SEED
 Olympic Community Action Programs
 Opportunities Industrialization Center of WA
 Opportunity Council
 Oregon Action
 Oregon Energy Coordinators Association
 Oregon Environmental Council
 Oregon HEAT
 Oregon State Public Interest Research Group
 Pacific Energy Innovation Association
 Pacific NW Regional Council of Carpenters
 Pacific Rivers Council
 The Policy Institute
 Portland Energy Conservation Inc.
 Portland General Electric
 Puget Sound Alliance for Retired Americans
 Puget Sound Energy
 Renewable Northwest Project
 Salmon for All
 Save Our Wild Salmon
 Seattle Audubon Society
 Seattle City Light
 Sierra Club
 Sierra Club, BC and MT Chapters
 Snake River Alliance
 Solar Oregon
 Solar Washington
 South Central Community Action Partnership, Inc.
 Southeast Idaho Community Action Agency
 Southern Alliance for Clean Energy
 Spokane Neighborhood Action Programs
 Student Advocates for Valuing the Environment
 Tahoma Audubon Society
 Trout Unlimited
 Union Of Concerned Scientists
 United Steelworkers of America, District 11
 WA CTED - Housing Division
 Washington Citizen Action
 Washington Environmental Council
 Washington State University Energy Program
 Working for Equality And Economic Liberation
 A World Institute for a Sustainable Humanity
 World Steward

✓
 sent 3/11/10



NW Energy Coalition
 for a clean and affordable energy future

February 26, 2010

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

Barton L. Kline
 Lisa D. Nordstrom
 Idaho Power Co.
 PO Box 70
 Boise, ID 83707-0070

Case No. IPC-E-09-09, In the Matter of the Application of Idaho Power Co. for a Prudency Determination of Energy Efficiency Rider Funds Spent in 2002-2007

Please accept these comments of the NW Energy Coalition in support of the Application filed by Idaho Power and the Stipulation jointly filed by Commission staff and the Company.

As energy efficiency resources become a larger part of utility resource portfolios and the investment of funds to acquire those resources become more significant it is crucial that utilities develop and use common, or at least consistent, protocols to evaluate, measure, verify and report savings and costs of demand-side management (DSM) program delivery. This enhanced focus will help ensure the cost-effective delivery of this resource and increase the credibility of DSM savings for reducing loads. The proposed stipulation and memorandum of understanding provides an important initial framework for developing an enhanced EM&V program. We recommend, as has been started with the MOU, that the three investor-owned electric utilities continue to collaborate, where appropriate, on research, field monitoring and data collection, and market characterization studies. These collaborative efforts can reduce costs and increase collective understanding of the resource and its delivery. We also recommend that the Commission keep in mind that thorough and effective EM&V will have costs associated with it at a level greater than currently budgeted by Idaho Power. It is our understanding that Idaho Power is allocating 1-1.5% of the current DSM budget for evaluation. Wayne Shirley with the Regulatory Assistance Project suggests that a more comprehensive and thorough EM&V program would require a budget that is between 3.5-6% of the DSM budget.

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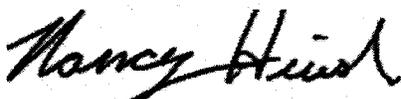
Since 2002, the NW Energy Coalition has been an active member of Idaho Power's Energy Efficiency Advisory Group. As part of our role on the EEAG we review program budgets, savings estimates, participation rates, program design and proposed changes to program design to facilitate more effective delivery. While our participation in the EEAG does not constitute a prudence review, it does give us sufficient confidence to support the stipulation recommendation to find the company's program expenditures prudent.

The Memorandum of Understanding contains a framework for filing DSM annual reports. The Coalition did not have the benefit of participating in the workshop and hearing the dialogue among the MOU signatories as to rationale behind some of the evaluation and cost-effectiveness recommendations. That said the general format outlined in the MOU seems to present the narrative and data in a very systematic and orderly manner. While the MOU Attachment No. 1 is only for informational purposes we are concerned that PUC staff are recommending the addition of the ratepayer impact test to the cost-effectiveness screens used by the utilities. Over the past ten years, use of the ratepayer impact test has been reduced as a screen for determining the cost-effectiveness of a program because it looks only at rate impacts rather than a comprehensive view that includes benefits from a measure or program including bill reductions.

We are pleased to see provision Number 7 in the MOU in support of expenses without direct energy savings. The Coalition believes that utility driven education, outreach and market research are critical to the success of a utility's full portfolio of offerings as well as individual programs. And finally, we recommend the Commission, Idaho Power and other interested parties look to the Northeast Energy Efficiency Partnership's EM&V Forum for protocols and information that can help improve this effort - <http://neep.org/emv-forum/about-emv-forum>.

Thank you for the opportunity to provide these comments. As the process for further refining the DSM reporting and evaluation template goes forward, the Coalition would like to participate in a more active manner. Particularly around the items raised by PUC staff as to their expectations outlined in Attachment No. 1.

Sincerely,



Nancy Hirsh
Policy Director
811 First Ave., #305
Seattle, WA 98119