

*✓ Gen. Ack sent 3/1/10*  
*✓ To Comm. S. H*  
**Jean Jewell**

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**From:** kmiller@snakeriveralliance.org  
**Sent:** Monday, March 01, 2010 8:04 AM  
**To:** Jean Jewell; Beverly Barker; Gene Fadness  
**Subject:** PUC Comment Form

A Comment from Ken Miller follows:

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Case Number: IPC-E-09-09  
Name: Ken Miller  
Address: Box 1731  
City: Boise  
State: ID  
Zip: 83701  
Daytime Telephone: 208 344-9161  
Contact E-Mail: kmiller@snakeriveralliance.org Name of Utility Company: Snake River Alliance  
Add to Mailing List: no

Please describe your comment briefly:  
March 1, 2010

TO: Jean Jewell, Commission Secretary  
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-09-09: IDAHO POWER COMPANY'S APPLICATION FOR A PRUDENCY DETERMINATION OF ENERGY EFFICIENCY RIDER FUNDS SPENT IN 202-2007

COMMENTS FROM THE SNAKE RIVER ALLIANCE

Dear Ms. Jewell:

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

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 also submits these comments as an environmental representative to Idaho Power's Integrated Resource Advisory Committee and as an observer of Idaho Power's Energy Efficiency Advisory Group.

The Alliance supports Idaho Power's application and the February 2009 Stipulation filed by Idaho Power and Public Utilities Commission Staff establishing the prudence of the use of \$14,657,971 in Energy Efficiency Rider funds incurred during the 2002-2007 period. The Alliance also supports, in general, the Memorandum of Understanding that resulted from the Oct. 5, 2009, demand-side management workshop that Staff hosted with Idaho Power representatives and an evaluation consultant. We believe every regulated utility is entitled to a timely recovery of prudently incurred and independently evaluated, measured, and verified energy efficiency expenditures.

While the Alliance supports the Company's application and the MOU, we remain curious about the circumstances surrounding the workshop. To the best of our knowledge, the workshop that included Staff and Company representatives was not an event that was open to the general public. While we do not challenge the outcome, we were not aware that the workshop was taking place and as a result do not have the benefit of assessing the interaction among workshop participants. As one of Idaho's nonprofit advocates for energy efficiency and related policies, we would appreciate the benefit of being able to participate in further discussions on this issue, should they arise.

Nonetheless, the Alliance continues to be a strong supporter of enhanced DSM programs among Idaho's regulated utilities and to the extent that this MOU and Idaho Power's commitment to a more thorough annual accounting of its conservation programs provides a greater evaluation of those programs, we see significant value in the agreement. We urge the Commission to embrace the merits of independent evaluation, measuring, and verification protocols.

We also support adequate funding of our utilities' EM&V procedures. During the course of the recently concluded Regulatory Assistance Project (RAP) workshops with Idaho Power and other stakeholders, we were advised that Idaho Power dedicates an average of 1.5 percent of its DSM budget to EM&V, while RAP representatives suggested an industry average is at least twice that amount. We are not advocating a precise percentage of DSM funds that should be dedicated to EM&V, but encourage the Commission to consider that question and whether the current funding of this important evaluation is adequate. This issue is all the more pertinent in light of recent increases in Idaho electric utility efficiency tariff riders and the consequent increases in the rider accounts.

The Alliance is pleased to note the provisions in Section 5 ("Evaluation Section") of the MOU and in particular the frequency of DSM program reviews, as well as Section 6 ("Program Specific Section"). And we absolutely agree with the contents of Section 7 ("Expenses Without Direct Energy Savings") and the ability of Idaho Power to recover as prudently incurred some expenses that do not directly lead to energy savings. We believe expenses for education and outreach, for example, are critical to informing Idaho Power customers about the availability of DSM programs and ultimately the success of such programs.

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: Barton L. Kline, Idaho Power Company; Lisa D. Nordstrom, Idaho Power Company; Ric Gale, Idaho Power Company; Theresa Drake, Idaho Power Company