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Jean Jewell

From: kmiller@snakeriveralliance.org
Sent: Friday, March 19, 2010 3:22 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Ken Miller follows:

Case Number: IPC-E-09-28
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: Idaho Power Add to Mailing List: yes

Please describe your comment briefly:
March 19, 2010

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-09-28: IDAHO POWER COMPANY'S APPLICATION FOR AUTHORITY TO CONVERT SCHEDULE 54 - FIXED COST ADJUSTMENT - FROM A PILOT SCHEDULE TO AN ONGOING PERMANENT SCHEDULE

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-09-28.

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 was granted intervenor status in this case in Order 30973.

The Alliance supports Idaho Power's request to move its current Fixed Cost Adjustment (FCA) program from its current pilot status to a permanent schedule. The experience with the current FCA pilot has proven that such a decoupling of energy efficiency and possible consequent reduced sales from Idaho Power's revenues is an effective mechanism to promote energy efficiency by Idaho Power and its customers. We believe the nominal adjustments, or true-ups, in residential and small-business rates are more than compensated by customers' reduced energy use. While some have objected to this mechanism because an upward true-up in rates appears to add to the utility bill, we believe that increase is more than offset by a reduction in the bill due to the deployment of Idaho Power's demand-side management measures.

This is particularly the case in light of the recent increase in Idaho Power's energy efficiency tariff rider to 4.75 percent. That Commission-approved increase has resulted in a significant boost in Idaho Power's efficiency rider account and has spurred impressive growth in the company's energy efficiency and demand response measures.

While the FCA and the decoupling of fixed costs collection from volumetric energy sales is but one mechanism to encourage greater energy savings while protecting Commission-approved utility revenues, we believe Idaho Power's experience with this pilot project has proven it to be effective in capturing additional energy savings.

We also agree with Idaho Power's request that once the FCA mechanism is made permanent, the FCA balances for residential and small commercial be separated and are treated as such for purposes of the fixed-cost adjustment rate.

Finally, the Alliance does not believe a formal hearing is necessary in this case.

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

Respectfully submitted,

Ken Miller
Clean Energy Program Director
Snake River Alliance
Box 1731
Boise, ID 83701
kmiller@snakeriveralliance.org

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 70.102.111.178
