

Idaho Public Utilities Commission

IPC-E-10-46

We are one of the farmers that have used the peak rewards program. I feel like it has been very successful. We have made some changes so that it will work for us, but if the incentive is reduced I think the program will lose its value. There will be farmers that will think it will be too much of a hassle. It took a while to get some farmers on board and if the incentive is changed we might lose some.

Margina Ward

Jean Jewell

From: secretary
Sent: Tuesday, February 08, 2011 8:40 PM
To: Barb Barrows; Jean Jewell
Subject: FW: case #IPC-E-10-46

From: jflorence@citlink.net[SMTP:JFLORENCE@CITLINK.NET]
Sent: Tuesday, February 08, 2011 8:38:08 PM
To: secretary
Subject: case #IPC-E-10-46
Auto forwarded by a Rule

Justin Florence
139 Heinrich Lane
McCall, ID 83638-5091

February 8, 2011

Public Utilities Commissioners
PO Box 83720
Boise, ID 83720-0074

Dear Public Utilities Commissioners:

I would like to comment on the Idaho Power Irrigation Peak Rewards Program, case number IPC-E-10-46. I have been a participant in the program for 2 years. It added hardship and burden to my operation and every year I evaluate whether it is worth it or not. It would not take much of a reduction in the intensive for me to not participate in the program.

Sincerely,

Justin Florence
208-634-7209

Jean Jewell

From: dean@magicvalleyproduce.com
Sent: Tuesday, February 08, 2011 4:22 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from dean gibson follows:

Case Number: *IPC-E-10-46*
Name: dean gibson
Address:
City: paul
State: idaho
Zip: 83347
Daytime Telephone:
Contact E-Mail: dean@magicvalleyproduce.com Name of Utility Company: idaho power
Acknowledge: acknowledge

Please describe your comment briefly:
Idaho Public Utilities Commission
P.O. 83720 Boise, Idaho 83720-0074

RE: IPCO irrigation Peak Rewards program change

Dear Commission:

My farm, with 3 meters on the IPCO Peak Rewards Program, has been enrolled since the Peak Rewards Program's inception several years ago. I have expended considerable effort and modification of my electrical systems to accommodate their program. It is functioning better after many modifications and the credits offered make the effort worthwhile. However, with the proposed changes in the amount of credit offered I don't think the program will be worthwhile to participate in next year. Also the proposal by IP 'to replace the program with existing thermal resources or purchase power' further erodes the value of the program for conservation purposes.

This program was devised by IP and instituted by them after careful consideration; therefore they should have to operate the program. They must have spent hundreds of thousands of dollars equipping systems with devises and developing software to run the system and all this expense born by the rate payer and now it will be diminished or lost altogether. I object to any substantial changes like those being proposed.

Sincerely yours,

Dean Gibson
Circle G Farms, Inc.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 216.83.68.141

Jean Jewell

From: calzola@earthlink.net
Sent: Tuesday, February 08, 2011 4:48 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from South Elmore Irrigation Co., Inc. follows:

Case Number: IPC-E-10-46
Name: South Elmore Irrigation Co., Inc.
Address:
City: Mountain Home
State: Idaho
Zip:
Daytime Telephone:
Contact E-Mail: calzola@earthlink.net
Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:
Dear Public Utilities Commissioners:

The peak rewards program has been a benefit by helping offset the increasing costs of our irrigation pumping costs.

We would like to see the program stay at the previous levels or at least increase the fixed payment incentive.

We have made significant changes to participate in the peak rewards program, contributing to decreases in the summer peak loads and reducing the risk of Idaho Power having brown outs and/or requiring additional gas peaker plants to be built.

If the proposed changes are approved it may reduce the percentage of participants which in turn will result in higher power rates for everyone.

Sincerely,
Terry Ketterling
& Jack Post
South Elmore Irrigation Co., Inc.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 75.167.185.101

Jean Jewell

From: dallasw@wadafarms.com
Sent: Tuesday, February 08, 2011 6:55 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from DALLAS WARD follows:

Case Number: *IPC-E-10-46*
Name: DALLAS WARD
Address:
City: PINGREE
State: IDAHO
Zip: 83262
Daytime Telephone: 208-656-7227
Contact E-Mail: dallasw@wadafarms.com
Name of Utility Company: IDAHO POWER COMPANY
Acknowledge: acknowledge

Please describe your comment briefly:
To the commissioners of the IPUC:

This letter is to let you know that we are dismayed to hear that Idaho Power is requesting a reduction in the incentive per KW for the participants in the Peak Rewards program. We have seen significant savings in our pumping cost for those pumps that we have enrolled in this program. We believe that it is a much wiser use of resources to pay customers to shut off irrigations pumps during the peak summer hours than it is to build new power plants and transmission lines or purchase power from other providers to meet peak demand.

The advantages appear obvious to us. We can save up to 25% of the costs of pumping for those pumps that are enrolled, while at the same time we protect our natural resources from further development and the money saved by us stays in the great State of Idaho and helps in the economy grow, rather than being a paid to another out of state power provider.

We would also like to point out that we have experienced here in South Eastern Idaho two consecutive summers of below normal temperatures. Hopefully when we return to "normal" summer weather patterns IPCO will realize the expected benefits of continuing this program in its current form.

We hope that as commissioners of the IPUC you will deny IPCO's request for any changes in this program.

Best Regards,

Dallas Ward
Dallas Ward
CFO
Wada Farms
326 South 1400 West
Pingree, Idaho 83262
208-684-9801

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 63.230.118.109

Jean Jewell

From: dirk.@driscollenterprise.com
Sent: Tuesday, February 08, 2011 9:24 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Dirk Driscoll follows:

Case Number: *IPC-E-10-46*
Name: Dirk Driscoll
Address: 3344 W 2200 S
City: Aberdeen
State: Idaho
Zip: 83210
Daytime Telephone: 208-705-8140
Contact E-Mail: dirk.@driscollenterprise.com Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:

We (Driscoll Brothers) feel very strongly that the Idaho Power Peak Rewards Program be continued. We have planned on it this year as it has worked very well the past few years for both our pivot and wheel line irrigation management on our crops to keep them irrigated efficiently and also allow a financial help to our farms with the credits received. We encourage all involved to look closely at the benefit this is to all concerned and have it continued as we feel it is a 'win-win' situation for everyone! We have already budgeted with our bank an estimated credit back to our farms that reduces the power costs to us that is significant similar to the past few years. To lose that, or have it reduced very much will continue to impact us where in we are already see our other costs to produce our crops continue to rise significantly.

Sincerely, Dirk Driscoll

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 67.215.46.10

Jean Jewell

From: tlket@starband.net
Sent: Tuesday, February 08, 2011 9:13 PM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Terry L. Ketterling follows:

Case Number: IPC-E-10-46
Name: Terry L. Ketterling
Address: 475 E 16th N
City: Mountain Home
State: Idaho
Zip: 83647
Daytime Telephone: 208 599 1010
Contact E-Mail: tlket@starband.net
Name of Utility Company: Idaho Power company
Acknowledge: acknowledge

Please describe your comment briefly:
Respectfully to the Public Utilities Commission

As consumer of electric power for production agriculture I am concerned about proposed changes to the Peak Rewards program that has been used for the last couple of years. After analysis we as a canal company (South Elmore Irrigation Company, Clover Hollow LLC, and TLK Farms Inc) have made significant investment to equipment and management to be able to participate. The time effort and financial resources necessary to participate do not include the possible effects on yield reduction or extra labor expenses, however as a means in doing our part to curb increase in power rates we felt it necessary to make every effort to participate. The proposed changes may not allow us to use this conservation method to help not only the utility but may not make financial sense for our participation. We as farmer know full well the importance of the conservation methods and plans for efficiency. We would hope that the program would not have significant changes and continue similar to last year. New power generating assets without conservation are sure to raise all power rates and seems not in the best interest of rate payers when these conservation method seem to be working

Thank you for the opportunity to comment.
Sincerely
Terry L Ketterling

On behalf of:
South Elmore Irrigation Company
Clover Hollow LLC
TLK Farms Inc

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 24.50.2.129

Jean Jewell

From: lynn_tominaga@hotmail.com
Sent: Tuesday, February 08, 2011 5:06 PM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Lynn Tomminaga follows:

Case Number: *IPC-E-10-46*
Name: Lynn Tomminaga
Address: P.O. Box 2624
City: Boise
State: Idaho
Zip: 83701
Daytime Telephone: 208.381.0294
Contact E-Mail: lynn_tominaga@hotmail.com Name of Utility Company: Idaho Power Company
Acknowledge: acknowledge

Please describe your comment briefly:
February 9, 2011

Idaho Public Utilities Commission
P.O. Box 83720
472 W. Washington
Boise, ID 83702

Re: Comments on Idaho Peak Rewards Program

Gentlemen:

On behalf of Idaho Irrigation Pumpers Association, I would like to submit the following comments with respect to Idaho Power Company's (IPCO) proposed changes to its Irrigation Load Control Program:

The changes IPCO initiated two years ago resulted in an innovative, flexible, and mutually-beneficial Irrigation Load Control Program. This demand side management program allowed the company to address its peak load requirements, offered individual participants an opportunity to reduce their electricity costs, benefited the irrigation class by lowering its overall cost of service, and benefited all ratepayers by not burdening them unduly with the cost of building or buying more expensive electrical resources.

It is unfortunate that the past two years have been characterized by cooler, wetter weather than had been experienced in the years leading up to the program's inception. Had the weather patterns been different, we believe the value of this program to the company would be substantially different.

A successful program must be cost-effective for the company, but IIPA had asked to delay building Langley Gulch because we did not believe that resource would not have been needed for four or five years or more. In fact, IIPA believed that the Peak Rewards program could have gained 400-500 Mwh or more of demand side management (DSM) if the company would just allow more irrigators to see the long term benefits of the program. In fact in April 2010, IPCO did not allow 50-60 irrigators to sign up past the April 1st deadline. IPCO cited the April 1st deadline so it could get participants in the program for the year, but in reality, IPCO was realizing it had a very successful program and wanted to limit the participation.

IPCO could have taken those individuals names and had them be part of the 2011 Peak Rewards Program. In reducing the program's payments, it will limit participation and discourage irrigators from signing up because the incentives will not cover the additional costs of labor or management of the irrigation systems.

IPCO has also expressed concerns that relying on the program more heavily will place undue hardship on the irrigators, possibly resulting in crop or yield losses, and reducing participation. If participation is reduced, the company is at risk in reducing its peak requirements during critical summer peak load. Irrigators appreciate the flexibility of the "opt out" provision to address that concern. IIPA believes that there is an opportunity for greater participation among irrigators, this opportunity spreads risk among a greater number of irrigators and reduce irrigators "cost of service" which would enable this rate class to stop taking the brunt of increased electrical rates when expansion and growth occur on the system.

IIPA's concern about the program is that IPCO will use this program as a "resource of last resort" or an insurance policy. The result of such an action would be to reduce the benefits to individual irrigators and probably would lead to reduced participation. In the conversations we have had with irrigators, none would object to the company using the program more often. Their attitude is that IPCO bought and paid for a resource that they have chosen not to fully use.

Another concern is the lack of information regarding the proposed changes. Because IPCO and IIPA have been involved in negotiation, there has not been sufficient time to communicate to irrigators the potential impact of the proposed changes. Again, in discussions with irrigators, IIPA is hearing that some irrigators have already built their incentive into operating budgets for the coming year. Should the company implement the proposed changes and should the company use the program as insurance only, those irrigators will probably not accrue sufficient financial benefit to continue their participation, making the company's concern that it cannot rely on irrigator's participation a self-fulfilling reality.

IIPA has concerns that the administrative costs paid to IPCO and the installation of radio controlled devices has cost rate payers millions of dollars. Will this be wasted if the program is not utilized to its best potential? If participation from the irrigation community diminishes because of IPCO short sidedness and not allowing the program to mature to its potential it seems a wasted of resources for both IIPA members and IPCO.

This has been a successful program, a program that has not been fully tested, and one that has some longevity for the company. IIPA agrees that the program must be cost-effective but it must be allowed to mature and continue. IIPA believes that it can be useful if IPCO will only use it more frequently to reduce its overall peak.

IIPA would like to thank the Idaho Public Utilities Commission for this opportunity to comment on this important program to the irrigation rate class and its many farm families who depend on the program.

Sincerely yours,

Lynn Tominaga
Executive Director

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 24.117.153.184