

KARL T. KLEIN  
DEPUTY ATTORNEY GENERAL  
IDAHO PUBLIC UTILITIES COMMISSION  
PO BOX 83720  
BOISE, IDAHO 83720-0074  
(208) 334-0312  
IDAHO BAR NO. 5156

RECEIVED  
2013 AUG 20 PM 3: 52  
IDAHO PUBLIC  
UTILITIES COMMISSION

Street Address for Express Mail:  
472 W. WASHINGTON  
BOISE, IDAHO 83702-5918

Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE APPLICATION )**  
**OF IDAHO POWER COMPANY FOR A )** **CASE NO. IPC-E-13-8**  
**DETERMINATION OF 2012 DEMAND-SIDE )**  
**MANAGEMENT EXPENDITURES AS )** **COMMENTS OF THE**  
**PRUDENTLY INCURRED. )** **COMMISSION STAFF**  
**)**

---

The Staff of the Idaho Public Utilities Commission comments as follows on Idaho Power Company's Application for a determination of 2012 demand-side management expenditures as prudently incurred.

**BACKGROUND**

On April 3, 2013, Idaho Power Company applied for an Order establishing that it prudently incurred \$46,356,160 in demand-side management (DSM) expenses in 2012, including \$25,857,603 in Idaho Energy Efficiency Rider expenses, \$6,019,109 in Custom Efficiency program incentive expenses, and \$14,479,447 of demand response program incentive expenses. Application at 1. The Company submitted a copy of its DSM 2012 Annual Report and testimony in support of its Application

The Company says it has implemented or manages wide ranging opportunities for all customer classes to participate in DSM activities, consistent with the Commission's direction that the Company pursue DSM programs to promote energy efficiency. The Company says it uses DSM programs to: (1) provide customers with programs and information to help them manage their energy