



[www.idahoconservation.org](http://www.idahoconservation.org)

**Idaho Conservation League**

PO Box 844, Boise, ID 83701  
208.345.6933

RECEIVED  
2013 MAY 22 PM 4:43  
IDAHO PUBLIC  
UTILITIES COMMISSION

May 22, 2013

Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Idaho 83702

Re: IPC-E-13-11, Custom Efficiency Incentive Payments Accounting Order

Commissioners,

The Idaho Conservation League (ICL) supports Idaho Power's application. ICL maintains that accounting for the Custom Efficiency program incentive payments as a regulatory asset with a carrying charge set at Idaho Power's authorized rate of return is a fair, just, and reasonable. Further, this accounting treatment better aligns the Company's economic incentives with this Commission's directive to pursue all cost effective energy efficiency. ICL looks forward to addressing this proposal in a future rate case.

Beyond aligning the regulatory framework with the Commission's policy directives, accounting for Custom Efficiency payments as a regulatory asset relieves pressure on the energy efficiency rider account. Returning to the system of collecting Custom Efficiency payments through the Energy Efficiency rider will result in an underfunding of energy efficiency through at least August 2014.<sup>1</sup> Because of this, ICL urges the Commission to increase the energy efficiency rider concurrently with approving this application to a level sufficient to bring the account to balance within one year. In short, ICL recommends the Commission align regulation with policy and provide timely cost recovery for prudent energy efficiency measures.

Respectfully,

Benjamin Otto  
Energy Associate  
Idaho Conservation League

---

<sup>1</sup> Idaho Power Application at Attachment 2.