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 IDAHO PUBLIC UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION FOR)	CASE NO. IPC-E-14-02
APPROVAL OF ITS AGREEMENT)	
WITH ENERNOC, INC., TO)	IDAHO CONSERVATION LEAGUE
IMPLEMENT AND OPERATE A)	
VOLUNTARY COMMERCIAL)	COMMENTS
DEMAND RESPONSE PROGRAM)	

The Idaho Conservation League (ICL) supports the Third Amendment to the contract between EnerNOC and Idaho Power regarding the FlexPeak program. Idaho Power's 2013 Demand Side Management Annual Report shows a benefit to cost ratio of 1.43 for the FlexPeak program.¹ The proposed amendments include a minor reduction in both the size and cost of the program and therefore are likely to maintain this cost-effectiveness. After reviewing the application and discovery in this case, ICL urges the Commission to approve the contract, which enables the continuation of a robust, cost-effective demand response program and thereby is in the public interest.

Demand response programs can benefit ratepayers by deferring or avoiding the cost of both operating existing and building new supply-side resources. Like most things, the devil is in the details. Here the relevant details are the characteristics and the cost of the demand response resource. The characteristics of the program define the size and availability, which combined indicate the ability of the program to defer or avoid supply-side resources. The cost of the

¹ Idaho Power 2013 DSM Annual Report at 97. The Commission may take official notice of this periodic report filed by a regulated utility in case no IPC-E-14-04. IDAPA 31.01.01.263.01.c.