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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY'S APPLICATION FOR AUTHORITY TO IMPLEMENT FIXED COST ADJUSTMENT RATES FOR SERVICE FROM JUNE 1, 2014 THROUGH MAY 31, 2015.	)	**CASE NO. IPC-E-14-03** **COMMENTS OF THE COMMISSION STAFF**

The Staff of the Idaho Public Utilities Commission comments as follows on Idaho Power Company's Application to implement Fixed Cost Adjustment (FCA) rates for electric service effective June 1, 2014 through May 31, 2015.

I. BACKGROUND

On March 14, 2014, Idaho Power Company (the "Company") applied to the Commission for an order allowing the Company to increase its FCA rates for electric service provided from June 1, 2014 through May 31, 2015. The FCA enables the Company to separate its fixed-cost revenues from its volumetric energy sales. It lets the Company recover its fixed costs of delivering energy—as established in its most recent general rate case—when energy sales and revenue have decreased below prescribed per-customer levels. The FCA rates are identified in tariff Schedule 54 and apply to the residential and small-general-service customer classes.

The FCA functions by first identifying an authorized fixed-cost recovery amount for the residential and small-general-service customer classes. This amount is a product of the number of customers in each class multiplied by the fixed-cost per customer rate, which is established as

part of determining the Company's revenue requirement in its most recent general rate case. The authorized recovery amount is then compared to the amount of fixed costs actually recovered by the Company. The amount of fixed costs actually recovered is determined by multiplying the weather-normalized sales for each class by the fixed-cost per energy rate, as established in the Company's most recent rate case. The difference between the authorized fixed-cost recovery amount and the actual fixed costs recovered results in an adjustment each year to the FCA rate.

With this Application, the Company says the 2013 FCA balance is $14,339,006 for the residential class and $573,436 for the small-general-service class, for a total amount to be recovered of $14,912,442. The proposed FCA deferral balance is an incremental increase above the FCA balance currently collected in customers' rates. Accordingly, the Company proposes to increase FCA rates by 1.17% for the residential class and 1.20% for the small-general-service class, for an overall change of 1.18%. The increase equates to a new FCA rate of 0.2913 cents-per-kWh for the residential class and 0.3709 cents-per-kWh for the small-general-service class.

II. STAFF ANALYSIS

Staff reviewed the Company's filing and supporting testimony from Company witness Harris, and verified that the Company used Commission-approved methodology to calculate the FCA deferral balance. Staff found that the Company's sales per customer for residential and small-general classes were lower in 2013 than in 2012. As a result, the Company's weather-normalized sales were insufficient to allow the Company to collect its authorized fixed costs.

To allow the Company to collect its under-recovered fixed costs, the Commission should increase the Company's rates by about $15 million for the 2014 PCA year. However, while Staff believes the Company should receive the requested increase in this case, Staff also believes: (a) the FCA methodology is flawed; and (b) the FCA no longer has its intended effect of encouraging the Company to invest in energy efficiency. Staff thus recommends that the Commission open a separate docket to reevaluate the FCA. These issues are further summarized below.

A. Flaws in the FCA Mechanism

Staff evaluated the FCA following its second year of permanent status and maintains that the mechanism has the following fundamental flaws:

1) *Weather Normalization Adjustment*- Staff believes adjusting downward above normal energy sales due to weather results in an over recovery of fixed costs through the FCA.

2) *Customer Count Methodology*- Staff believes it is more appropriate to use a median customer count rather than an average customer count for the FCA calculation. Staff also believes the Company should report the number of customers switching from Schedules 7 and 9 and their energy use so Staff can determine how they impact the FCA calculation.

3) *Calculation of the 3% Rate Adjustment Cap*- Staff believes the calculation of the cap should be reevaluated and possibly changed given the layering effect of the FCA between rate cases, and that the basis for measuring rate impacts should be reevaluated.

4) *Cross Subsidization Issue*- Staff believes the cross-subsidization of other classes by residential and small-general-service customers in the calculation of the Fixed Cost per Customer rate (FCC) and Fixed Cost per Energy rate (FCE) should be reassessed.

These fundamental flaws are further discussed below.

1. Weather Normalization Adjustment

Staff evaluated how the weather-normalization adjustment is used in the FCA. In summary, if sales increases are attributed to above-average weather, sales are adjusted downward to reflect "normal sales;" the converse is true for weather-related below-normal sales. As a result, the FCA does not acknowledge the fixed costs that the Company actually collected when sales are above-normal due to weather.[1] Although the Commission designed the weather adjustment to be symmetrical, Staff now believes the Company significantly over collects authorized fixed costs when sales are above-normal due to weather.

The Company's last cost-of-service study shows that the Company collects about 90% of its fixed costs for residential customers through energy rates. For each kWh adjusted downward, the Company recovers nearly double the associated fixed costs when weather contributes to higher-than-normal energy sales. Similarly, the Company collects about 85% of its fixed costs for small-general-service customers through energy rates. The Commission implemented the FCA true-up mechanism because it "assures a more stable utility recovery of fixed costs that are now recovered in the energy rate component of residential and small-general-service customers."

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[1] Essentially, weather normalization in the FCA reallocates weather risk, measured in lost fixed margin, between the Company and customers. With weather normalization, customers are exposed and pay more in above-average years, and without weather normalization customers are exposed and pay more in below-average weather years.

Order No. 30267. But the current FCA does more than assure stable recovery of fixed costs; it ignores fixed-cost over recovery during the FCA timeframe when weather increases energy sales. Fixed costs are fully collected in base rates throughout the year, and then recovered again through the FCA by weather normalizing downward the actual sales.

This year's weather adjustment is substantial, totaling about $15,840,756 in fixed-cost recovery from the residential class and $253,804 from the small-general-service class. The weather adjustment is larger than the deferral balance itself. If the FCA was not weather normalized, it would result in a credit of $1,047,317 million this year.[2] The only year with a weather adjustment comparable to the current one was in 2009, when the adjustment for residential customers was about $7,313,829 in fixed-cost recovery. Historically, there have only been two years in the last seven where the residential weather adjustment reflected that the Company sold less energy than it would have sold under normal conditions; otherwise, actual sales have been adjusted downward because the Company sold more energy than it would have sold under normal conditions. Similarly, there has only been one year where the small-general-service weather adjustment reflected that the Company sold less energy than it would have under normal conditions. In the last seven years, the weather adjustment has approximately provided the Company with $27,568,348 in net actual fixed-cost recovery from the FCA calculation.

Staff believes the Commission should reevaluate the weather adjustment to determine if the Company over recovers its fixed costs when weather causes energy usage to be higher than normal and, if so, whether that over recovery is consistent with the Commission's intent when it approved the FCA mechanism. Staff acknowledges that the Company would have had even greater found fixed margin without demand-side management (DSM). But the lost fixed margin associated with Company DSM in a given year can and has been dwarfed by the impact of the weather adjustment this year.

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[2] This does not include the impact of monthly interest that may be accrued.

2. Customer Count Methodology

The Company implemented its new billing system during the FCA period and had to modify how it calculates its prorated customer count.[3] Specifically, in August 2013, the Company started using a customer count based on the average number of active meters at the end of each month. Before August, the Company determined the customer count like it did in prior years: the customer count was prorated based on revenue attributable to the Service Charge. The proration methodology based on the Service Charge revenue has been used in the past because it includes customers that have only been billed for a partial month. Although the Company's new methodology does not separately track the revenue associated with the Minimum Charge and the Service Charge, the Company applies a ratio to the month-end count to adjust the customer count. Staff reviewed the accuracy and impact of the ratio, and found it to be comparable to the prorated customer count based on the Service Charge revenue. The adjustment appears to acknowledge customers that have a partial month of service.

Staff supports the Company's methodology for calculating the monthly customer count. But another issue exists. Staff analyzed the historical number of customers at the end of each month from 2009-2013 and confirmed the variations between the months make the average customer count a poor indicator of actual customers. Due to residential customer growth, the Company is adding customers over the year. This causes the average to be skewed, or overstate the "typical" number of customers in a month. Under these circumstances, the median, or midpoint, is a more accurate representation of customers given the distribution of monthly customer counts.[4] Consequently, it is more appropriate to use median customers in the calculation of allowed fixed costs.

In 2013, if the Company would have used the median instead of the mean, there would have been about 529 fewer customers. Because the Company's approved revenue is based on number of customers (FCC x Customer Count), using the median instead of the mean would have reduced the FCA balance by about $330,430. When looking at both customer classes historically, from 2007-2013, using the median instead of the mean would have reduced the FCA

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[3] The prorated customer counts form the basis for authorized fixed revenues in the FCA.

[4] Most economic analysis models study data for skewness and incorporate this into their calculations. Skewness risk is the risk that a model assumes a normal distribution of data when in fact data is skewed to the left or right of the mean, or average.

balance by about $441,185. Staff believes that going forward, the Company should use median number of customers at the end of each month.

Staff also believes the Company should monitor trends in the number of Schedule 7 customers moving to Schedule 9. In 2005, the Company changed the rate structure of Schedule 7. As a result, the Company anticipated about 20% of customers would switch to Schedule 9. Before implementing its new billing system, the Company did not separately track customers who switched schedules. Staff analyzed the historical trends of Schedule 7 customers migrating to Schedule 9 and found that Schedule 7 customers have continued migrating to Schedule 9. These customers are high-energy users compared to the small-general-service class as a whole, making it appear as though Schedule 7 customers are conserving energy and artificially lowering use-per-customer. Staff thus believes the Company is receiving credit through the FCA simply because higher-usage Schedule 7 customers have moved to Schedule 9. To ensure that the Company is properly calculating lost fixed costs, Staff believes that the migration between Schedules 7 and 9 should be factored into the FCA.

3. FCA Rate Changes and the 3% Cap

In Commission Order No. 30267, the Commission states: the "FCA mechanism also incorporates a 3% cap on annual increases with carryover of unrecovered deferred costs to subsequent years." The Commission, in its discretion and judgment, can impose the cap or let the rate change to avoid deferring recovery to the following year. Staff notes that the basis for the cap on rate changes has not been clearly defined, which has led to subjectivity in application. Staff believes that before the next FCA, the term "annual increases" should be clarified so it describes how the cap should apply to the FCA calculation.

The Company says the proposed increase of about $6 million in FCA collections is a 1.18% increase from current billed rates. Harris, DI, p. 10. If so, the base for calculating the percentage rate change is about $510 million ($6 million divided by 1.18%), which reflects all billed revenues, including base revenues and PCA revenues for the upcoming forecasted PCA year, and embedded FCA revenues. In other words, rate changes and caps are calculated using forecasted sales and revenues, which understates the magnitude of the rate change effect on customers and increases the absolute dollar amount represented by the 3% cap on a yearly basis.

Through discovery, Staff learned that the Company calculates the 3% cap in a similar fashion. The cap is calculated by taking 3% of the base revenue using the updated billing

components from the PCA filing plus the change in FCA revenues. Based on the Company's methodology, Staff calculated that this year's change in FCA deferral would have to be $13.5 million to reach the cap, or an additional $7.5 million above the Company's request.

Staff believes the methodology for quantifying rate changes and calculating the cap should be revisited, particularly given the cumulative impact of several FCA increases between rate cases. Staff questions whether it is appropriate to use forecasted billing determinants in the FCA for anything beyond calculating the FCA rates to collect the deferral balance. FCA rate changes and caps that incorporate revenue growth from projected sales create a layering effect that dilutes the usefulness of the 3% cap. The cap has increased by nearly $1 million (7%) since the last general rate case. Furthermore, the Company has collected about $24 million, or 6% more total revenue through the FCA than what was approved to be collected in the last general rate case.[5] The deferral balances continue to grow, even in post rate case years such as 2012, when the balance should have been close to zero because the FCC and FCE were reset in January.

4. Cross-Subsidization

Since the FCA was established, one of the fundamental goals has been to make sure cross-subsidies are minimized across rate classes. Order No. 30267, p. 6. However, Staff believes the residential and small commercial customers continue to subsidize the other schedules given the methodology used for calculating the FCC and FCE.

During a general rate case, a cost-of-service study is performed to guide allocations of revenue responsibility among classes. If rates are designed to collect full class cost-of-service, no interclass subsidies exist. That has not been the case since the advent of the FCA, as residential customers have covered a portion of fixed costs associated with other classes. Consequently, the FCC and FCE calculations include a "Weighted Average Fixed Cost % of Short-Fall," which is a ratio used to incorporate the fixed-cost revenue shortfall (parity ratios < 1.00) of all the other rate classes. Staff reviewed prior FCC and FCE calculations and found about 3.4% of the Company's allowable fixed-cost recovery for residential customers was to subsidize the shortfall from the other customer classes, which currently totals over $8 million.

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[5] Calculated based on the approved and proposed FCA deferral balances since the last general rate case, IPC-E-11-08. Total revenue for the residential and small-general-service customer classes.

The interclass subsidy is increased beyond that built into rate design through the FCA because part of the deferral balance is used to collect non-residential or small-general-service fixed costs.

Staff believes the FCC and FCE methodology may be inequitable, and that it should be reevaluated to see if a more equitable methodology can be developed given the various cost-of-service results.

B. The FCA No Longer Has the Intended Effect

The FCA was originally implemented to remove "a Company-identified financial disincentive to energy efficiency and DSM investment."[6] Although Staff and the Commission were concerned that the FCA reimbursed the Company for reduced sales that were not driven by its DSM programs, the intent of the mechanism appeared to be working. When the disincentive was originally removed, the Company's annual energy savings grew rapidly. During the initial pilot phase, the FCA produced a credit for customers in the first year, and surcharges ranged from about $2.6 to $6 million.

The situation has changed considerably in subsequent years. The Company's energy savings peaked in 2010, declined in the two ensuing years, and dramatically dropped off in 2013. Meanwhile, the FCA balance has substantially increased. The blended FCA balance nearly doubled—from $8.9 million in 2012 to $15 million in 2013—while concurrently the Company's year-over-year energy savings fell by 42%.[7]

The figure below, reproduced from page 5 of the Company's DSM 2013 Annual Report, shows that 2013 energy savings are only somewhat higher than its 2007 savings, the first year of the FCA. That demonstrates that the ever-escalating FCA balances are no longer driven by the Company's willingness or ability to acquire energy savings. The FCA mechanism has effectively severed the link between the Company's sales and revenue but the Company has not maintained its enhanced commitment to energy efficiency. Staff points out that neither Avista nor Rocky Mountain has a decoupling mechanism, and both utilities have maintained healthy and stable energy savings for years.

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[6]Case No. IPC-E-04-15, Order No. 30267, page 13.
[7] Idaho Power's DSM 2013 Annual Report, page 1.

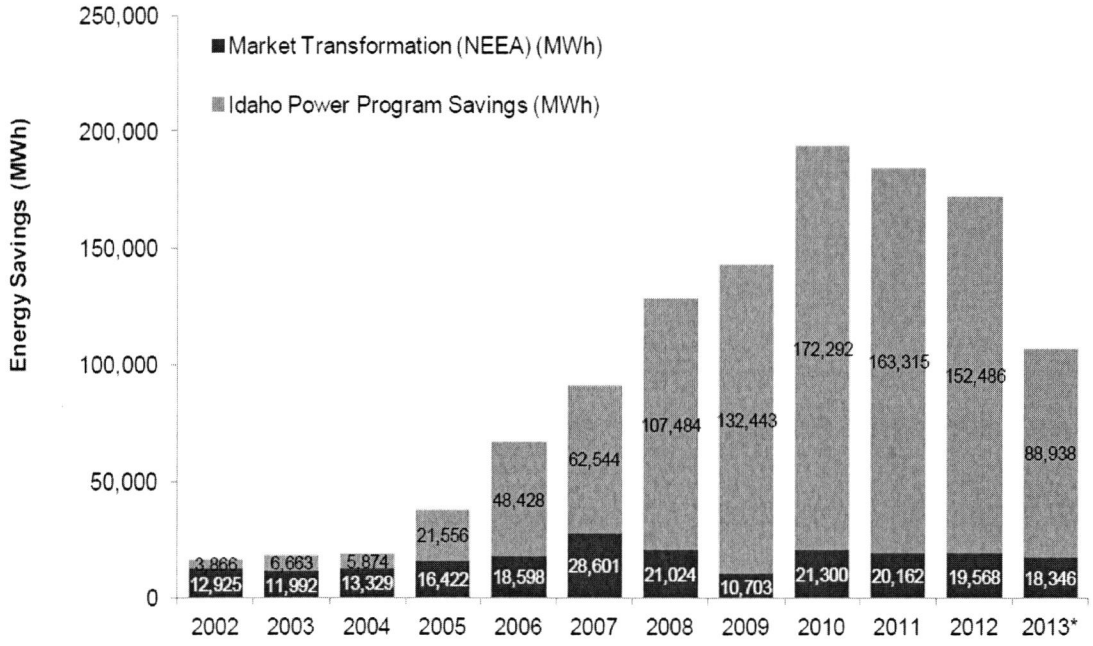

Figure 2. Annual energy savings, 2002–2013 (MWh)

*In 2013, two of the three demand response programs were temporarily suspended.
Note: 2013 market-transformation savings (Northwest Energy Efficiency Alliance [NEEA]) are preliminary.

Following recent reductions in energy-efficiency expenditures and savings, the Company identifies $20 million of current-and-forecasted surplus energy-efficiency tariff rider funds. The Company proposes to refund this surplus through the annual Power Cost Adjustment.[8] The 2014 forecasted rider expenses—which are in line with the 2013 expenditure that produced the lowest savings in six years—indicate that the Company does not expect material improvement from its programs in the near future. Substantial and ongoing reductions in energy efficiency demonstrate that the FCA has not corrected the Company-identified throughput problem as intended.

1. Effect of lower avoided-costs on residential energy efficiency

The Company's DSM 2013 Annual Reports states: "The energy savings in 2013 for the residential sector decreased by 28 percent..."[9] Idaho Power says this decrease is caused partially

[8] Case No. IPC-E-14-05.
[9] Idaho Power's DSM 2013 Annual Report, page 10.

by reduced deemed saving from the Regional Technical Forum (RTF).[10] Falling avoided costs are another factor that will tend to decrease residential savings in the future.

Residential programs are typically less cost-effective than commercial or industrial programs because the per-unit savings are smaller and the overhead costs associated with marketing to more customers and processing more individual rebates is greater. With the Commission acknowledgement of the 2013 IRP, the Company will begin using the approximate 40% reduction in avoided costs from the 2013 IRP to analyze its 2014 programs. Preliminary analysis conducted by the Company and presented to the Energy Efficiency Advisory Committee (EEAG) indicates that, using 2012 savings, four of the nine residential programs will not be cost effective under the new avoided costs from the total resource cost (TRC) perspective.[11] Because 2013 savings are significantly lower and not anticipated to dramatically rebound in future years, cost-effectiveness will likely be worse than the preliminary forecast. Fewer cost-effective residential programs will reduce residential energy savings, diminishing the impact of energy efficiency on per-customer consumption.

Although some of its current programs may not be cost-effective in the future, the Company has options for replacing those savings with new residential programs. For example, the Company is the only regulated electric utility in Idaho that has not expanded its residential portfolio to include a cost-effective residential behavior-based program. Despite its investment in Advanced Metering Infrastructure (AMI), the Company has not significantly expanded rate structures designed to promote energy efficiency since the advent of tiered rates in 2008. The Company also does not evaluate potential energy savings from alternative pricing structures in the Integrated Resource Planning (IRP) process. Without action, the Company's residential energy savings will continue to decline whether the FCA is in place or not.

2. Use-per-customer forecast and symmetry

FCA supporters have long applauded its symmetry regarding credits and surcharges to customers. When use-per-customer decreases, customers pay a surcharge to cover the Company's unrecovered fixed costs. Conversely, when use-per-customer increases, customers receive a credit because the Company's fixed costs have already been recovered through energy

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[10] Idaho Power's DSM 2013 Annual Report, page 10.
[11] This count excludes the Company's two low-income programs.

charges. Functional symmetry thus depends on the assumption that use-per-customer will fluctuate in both directions. Seven years of FCA experience conclusively shows that this assumption is false. Customers have paid surcharges in six of the seven FCA years. Further, the Company's Conservation Potential Assessment (CPA) anticipates an ongoing 0.3% annual decline in residential use per customer before any incremental utility energy efficiency savings, totaling a 5% overall decline over the twenty-year planning period.[12]

The Company's 2013 IRP reached a similar conclusion. The graph below, reproduced from the IRP, forecasts continued decline in weather-normalized residential use-per-customer.[13] The graph shows that yearly use-per-customer has been declining by nearly 0.75% on average since 1980. The year-to-year decline in residential use-per-customer cannot be attributed to the Company's DSM efforts. New energy efficiency only affects the use-per-customer in the year those measures are installed—after the first year, the use-per-customer would remain stable at the lower level, but it would not decrease further without additional DSM. With use-per-customer only forecasted to decrease, the FCA will not produce functional symmetry.

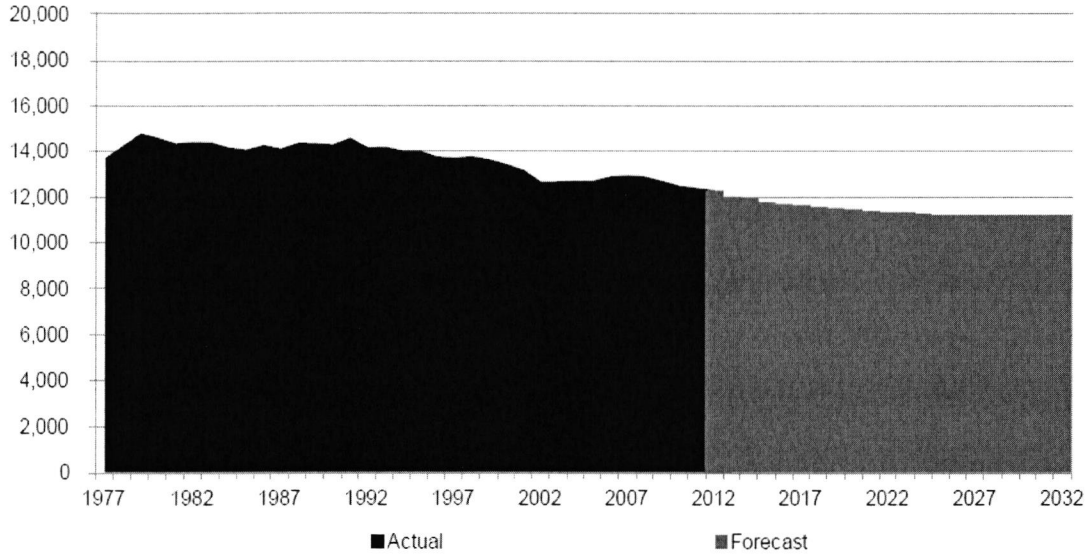

Figure 5. Forecast residential use per customer (weather-adjusted kWh)

The growing penetration of natural gas space heating is a primary driver to declining residential use-per-customer. Residential new construction primarily consists of natural gas heat

[12] EnerNoc Utility Solutions, February 15, 2013, Idaho Power Energy Efficiency Potential Study, page 4-3.
[13] Idaho Power Integrated Resource Plan, Appendix A: Sales and Load Forecast. June 2013, page 16. The IRP performs separate analyses to account for future DSM savings. These results are incorporated in the IRP independent of the sales and load forecast.

(where available), and conversions from electric to gas heat have become more cost-effective as gas customer rates remain low and electric customer rates continue to rise. Other significant factors contributing to declining use-per-customer are more stringent lighting standards and building codes. Except for its financial contributions to the Northwest Energy Efficiency Alliance (NEEA), the Company has not strongly supported more stringent standards and codes.

Use-per-customer is a function of the rate at which customer counts grow in relation to class energy sales, driving the FCA balance. FCA balances grow when customer counts increase relative to energy sales (resulting in declining use-per-customer). Again, the IRP forecasts conditions that predict on-going FCA surcharges. The IRP anticipates that the Company will gain 139,000 new residential customers by 2032, an increase of 33% over the planning period.[14] The Company's IRP summarizes the favorable FCA forecast:

> Growth in the number of households within Idaho Power's service area, combined with an expected declining consumption per household, results in a 1.1-percent average residential load-growth rate. The number of residential customers in Idaho Power's service territory is expected to increase 1.5% annually from 416,000 to nearly 555,000 by the end of the planning period in 2032.[15]

Because the 1.5% growth in customers is expected to exceed the growth in sales (1.1%), the FCA's symmetry is extremely unlikely to produce customer credits. Unless modified, the FCA balances will continue capitalizing on trends that have little if any relation to the Company's DSM programs.

Based on seven years of experience, the FCA has served as a revenue stabilization mechanism far more successfully than enabling Company-sponsored energy efficiency. Staff believes that—especially this year—the FCA has harmed customers far more than it has benefited them, and that the FCA's efficacy diminishes in proportion to the Company's declining energy efficiency.

For these reasons, Staff recommends that the Commission open a separate docket. Workshops should be conducted with interested parties on how the FCA should be modified, removed, or replaced to better address goals that the current FCA was intended to achieve. This should be completed prior to next year's FCA filing.

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[14] Idaho Power 2013 Integrated Resource Plan, Appendix A: Sales and Load Forecast. June 2013, page 15.
[15] Idaho Power 2013 Integrated Resource Plan, June 2013, page 49.

3. Possible Options for Workshop Discussions

There are a variety of options for modifying or replacing the FCA that could foster productive discussion at workshops. For example, workshop participants could consider recovery of fixed costs through demand charges for residential customers. Demand charges would reduce the amount of fixed costs recovered through energy rates, thereby reducing the disincentive for energy efficiency, while utilizing the capabilities of the Company's AMI. Another consideration for workshops is replacing the FCA with a Lost Revenue Mechanism, which utilizes the utility's annual DSM filings to isolate energy-efficiency savings for reimbursement. Lost Revenue Mechanisms may be more appropriate now than when the FCA was created since the Company relies on rigorously developed Regional Technical Forum (RTF) savings for all but five of its 235 residential measures.[16]

Workshop participants might also consider removing weatherization normalization from the FCA. The Company has no more control over the weather than it does over most of the other factors that influence use-per-customer, so there is little evidence that the weather-normalization process fairly addresses above normal years where the Company may have recovered all its authorized fixed costs.

C. Customer Notice and Press Release

The Customer Notice and Press Release were included in the Company's Application. Both comply with Procedural Rule 125, IDAPA 31.01.01.125. The Customer Notices were mailed to Company customers with cyclical billings. The last notice was mailed on April 21, 2014, which allowed customers a reasonable opportunity to file timely comments with the Commission by the May 8, 2014 deadline.

As of May 6, 2014, seven comments have been filed. Five customers oppose the proposed increase, while one customer supports it. Another customer comments on the Annual Adjustment Mechanism, which appears as a line item on customer bills, but does not specifically address the proposed FCA increase.

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[16] This count excludes low-income measures.

III. STAFF RECOMMENDATION

Staff recommends that the Commission approve the Company's FCA filing with a net deferral balance of positive $14,912,442 for the 2014-2015 period. For the affected customer classes, Staff recommends approval of a 1.18% increase to total billed revenue, including the FCA. Based on the Company's sales forecast, Staff recommends approval of FCA rates equal to 0.2913 cents per kWh for residential customers, and 0.3709 for small-general-service customers.

Staff continues to emphasize its concerns about the FCA methodology and impact. Staff recommends the Commission open a separate docket with workshops to investigate the FCA mechanism and reevaluate its intended purpose and performance. The workshops would be open to interested parties to discuss how the FCA should modified, eliminated, or replaced to better address goals the FCA was intended to achieve.

Respectfully submitted this 8th day of May 2014.

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i:umisc/comments/ipce14.3kkdesdmebab comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 8TH DAY OF MAY 2014, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF,** IN CASE NO. IPC-E-14-03, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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