

Benjamin J. Otto (ISB No. 8292)
710 N 6th Street
Boise, ID 83701
Ph: (208) 345-6933 x 12
Fax: (208) 344-0344
botto@idahoconservation.org

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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	CASE NO. IPC-E-14-04
APPLICATION OF IDAHO POWER)	
COMPANY FOR A DETERMINATION)	COMMENTS
OF 2013 DEMAND-SIDE)	OF THE
MANAGEMENT (“DSM”) EXPENSES)	IDAHO CONSERVATION LEAGUE
AS PRUDENTLY INCURRED.)	

The Idaho Conservation League (ICL) recommends the Commission find prudent Idaho Power’s 2013 Demand Side Management (DSM) expenses. The 2013 DSM report shows that most programs past the Total Resource Cost test that weighs the benefits of efficiency against the avoided costs of energy and capacity. All programs passed the more appropriate Utility Cost Test. While the Company did acquire cost-effective savings, ICL recommends the Commission find imprudent Idaho Power’s administration of many programs in 2013, specifically marketing, internal workflows, and acquired savings compared to prior years and identified potential. Prudent management includes both wisely spending customer’s money and effectively administering programs.

ICL’s comments cover five main topics: the calculation of the avoided costs used to compare efficiency benefits; the appropriate cost and benefit test; a review of residential programs; a review of commercial and industrial program; and a review of Idaho Power’s market transformation activities.