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Attorney for the Commission Staff

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF	)	
IDAHO POWER COMPANY FOR AUTHORITY	)	CASE NO. IPC-E-16-30
TO CONSOLIDATE ANNUAL REPORTING	)	
REQUIREMENT.	)	COMMENTS OF THE
	)	COMMISSION STAFF
	)	
	)	

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**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Camille Christen, Deputy Attorney General, and in response to the Notice of Notice of Application and Modified Procedure issued in Order No. 33669 on December 13, 2016, in Case No. IPC-E-16-30, submits the following comments.

### BACKGROUND

On November 23, 2016, Idaho Power Company petitioned the Commission to amend Order No. 29505 to change the requirement that the Company's Weatherization Assistance for Qualified Customers (WAQC) report be filed separately from the Company's Demand-Side Management (DSM) Annual Report, and to allow the Company to include this information in the DSM Annual Report going forward. Petition at 1. The Company requests approval of this proposal by February 1, 2017, with the consolidated reporting to begin with the March 15, 2017 DSM Annual Report. *Id.* at 4.

The Company explains that in Order No. 29505 (Case No. IPC-E-03-13), the Commission required the Company to file an annual WAQC report separately from the DSM Annual Report. *Id.* at 2.

It is the Company's belief that the separate reporting requirement was imposed to allow the Commission to more easily monitor the DSM and weatherization programs, which were relatively small at the time of the Order, but expected to grow significantly. *Id.*

The Company states that since 1989, it has filed conservation or DSM reports that included information on the weatherization program. *Id.* It has filed annual DSM reports since 2011, which include a WAQC chapter containing similar content to that provided in the annual WAQC report. *Id.* The Company also states that the DSM and WAQC annual reports cover the same annual reporting periods. *Id.* at 3.

The Company states that all WAQC reporting requirements established in Order No. 29505 will continue to be satisfied by including the WAQC information as part of the DSM Annual Report. *Id.* The Company explains that consolidating the WAQC report information into the DSM Annual Report will eliminate duplicative reporting and reduce costs.

The Company states that it has consulted with certain parties on the proposal to consolidate the WAQC report into the DSM Annual Report, and that the parties (Commission Staff, the Executive Director of the Community Action Partnership Agency of Idaho, and members of the Energy Efficiency Advisory Group) were supportive. *Id.*

The Company requests to include the required WAQC report information in the DSM Annual Report filed on March 15<sup>th</sup> each year, and to eliminate the requirement to file a separate WAQC report (currently filed on April 1<sup>st</sup>). The Company requests approval of this proposal by February 1, 2017, with consolidated reporting to begin in the 2016 DSM Annual Report to be filed on March 15, 2017. *Id.* at 6, 7.

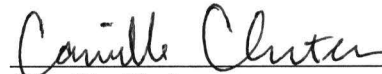
## **STAFF ANALYSIS**

Staff agrees that the separate WAQC Report provides information currently included in the DSM Annual Report and appreciates the Company's proposal to consolidate its WAQC reporting in its DSM Annual Report. Staff believes that customers are best served by eliminating redundant reports because it could reduce costs, while continuing to provide the same program information specified in Order No. 29505.

## STAFF RECOMMENDATION

Staff recommends that the Commission approve the Company's request to include the required WAQC report information in the DSM Annual Report going forward, starting with the 2016 DSM Annual Report.

Respectfully submitted this 10<sup>th</sup> day of January 2017.



Camille Christen  
Deputy Attorney General

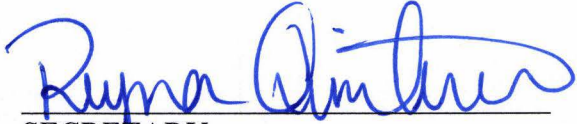
Technical Staff: Stacey Donohue  
Donn English

i:umisc/comments/ipce16.30ccsdde comments

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 10<sup>TH</sup> DAY OF JANUARY 2017, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-16-30, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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SECRETARY