

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

RECEIVED
2017 MAR 14 PM 3:16
IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE
APPLICATION OF IDAHO POWER
COMPANY FOR AUTHORITY TO
REVISE THE ENERGY EFFICIENCY
RIDER, TARIFF SCHEUDLE 91.

)
)
)
)
)
)

CASE NO. IPC-E-16-33

THE IDAHO CONSERVATION
LEAGUE
COMMENTS

The Idaho Conservation League ("ICL") supports Idaho Power's request to adjust the Schedule 91 Energy Efficiency Rider. ICL has consistently advocated for sufficient funding to achieve all cost effective energy efficiency. Here Idaho Power proposes to reduce the rider percentage by 0.25%. Based on our review we believe the resulting funding level is sufficient to support current and future energy efficiency activities.

Our position is founded on two pillars:

We believe Idaho Power's forecast of future energy efficiency rider revenues and program expenses is reasonable. We support forecasting budgets for several years because annual program expenses can be lumpy as a result of large, complex industrial and commercial efficiency projects.

We have repeatedly heard from all stakeholders that the appropriate metric in Idaho is the pursuit of all cost effective energy efficiency. To the extent this utility pursuit requires additional funding, the efficiency rider budget does not limit utility actions.

ICL also supports Idaho Power's request to end the annual \$4 million transfer from the Rider account to the Power Cost Adjustment. We agree this transfer is a relict of previous adjustments to the efficiency rider and demand response investments. With the adjustment to the Rider in this case, this transfer is no longer necessary.

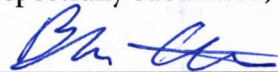
ICL supports Idaho Power's proposed refund to customers of \$13 million in unspent energy efficiency dollars. We always prefer that a utility spend efficiency dollars on efficiency programs. Here, we support reducing the efficiency rider level because we recognize there is a current mismatch between funding collected and expenses incurred for Idaho Power. We support this one-time refund in order to reset the account balances and clarify the funding and program spending going forward. A significant part of ICL's support relies on Idaho Power's documented efforts to expand efficiency marketing and energy savings. We are pleased both of these metrics continue to trend upward.

In prior years, the unspent efficiency funding was used to offset power cost increases. ICL is specifically opposed to this practice. Using efficiency funding to mask power costs hides the true cost of power from customers thereby preventing them from making informed choices about energy use. Secondly, ICL opposes using customer funds collected for a specific purpose, here energy efficiency, for an entirely different purpose, power costs. If the Commission or other parties wish to address power cost volatility the Power Cost Adjustment docket is the appropriate forum.

ICL recognizes and appreciates Idaho Power's effort to improve and expand energy efficiency programs over the past few years. Based on our review we believe the proposal here strikes the appropriate balance between program funding and expected investments. Accordingly, we urge the Commission to approve Idaho Power's application.

DATED this 14th day of March 2017.

Respectfully submitted,



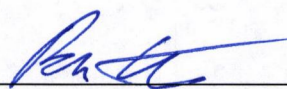
Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March 2017, I delivered true and correct copies of the foregoing COMMENTS to the following persons via the method of service noted:

Hand delivery:

Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983
(Original and seven copies provided)



Benjamin J. Otto

Electronic Mail:

Lisa D. Nordstrom
Regulatory Dockets
Tami White
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
lnordstrom@idahopower.com
twhite@idahopower.com
dockets@idahopower.com

Eric I. Olsen
ECHOHAWK & OLSEN, PLLC
505 Preshing Ave., Suite 100
P.O. Box 6119
Pocatello, Idaho 83205
elo@echohawk.com

Anthony Yankel
12700 Blake Avenue, Unit 2505
Lakewood, Ohio 44107
tony@yankle.net

Elizabeth A. Koeckeritz
Deputy City Attorney
BOISE CITY ATTORNEY'S OFFICE
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701
ekoeckeritz@cityofboise.org