BRAD PURDY

DEPUTY ATTORNEY GENERAL

IDAHO PUBLIC UTILITIES COMMISSION

472 WEST WASHINGTON STREET

PO BOX 83720

BOISE, IDAHO  83720-0074

(208) 334-0357

Street Address for Express Mail:

472 W WASHINGTON

BOISE ID  83702-5983

Attorney for the Commission Staff

BEFORE  THE  IDAHO  PUBLIC  UTILITIES  COMMISSION

IN THE MATTER OF THE APPLICATION OF )

IDAHO POWER COMPANY FOR AUTHORITY)CASE  NO.  IPC-E-97-12

TO INCREASE ITS RATES AND CHARGES)

TO RECOVER DEMAND SIDE MANAGEMENT/)FIRST PRODUCTION

CONSERVATION EXPENDITURES.)REQUEST OF THE

)COMMISSION STAFF

  )    TO IDAHO POWER

 )COMPANY

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

The Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Brad Purdy, Deputy Attorney General, requests that Idaho Power Company provide the following documents and information on or before  APRIL 13, 1998.

This Production Request is to be considered as continuing, and Idaho Power Company is requested to provide, by way of supplementary responses, additional documents that it or any person acting on its behalf may later obtain that will augment the documents produced.

REQUEST NO. 1:  Provide copies of any program reports, evaluations, impact assessments, performance summaries or other similar documents prepared for the Agricultural Choices Program.

REQUEST NO. 2:  For each element of the Agricultural Choices Program (i.e. large, medium, small and new), provide a program history showing actual program costs (as opposed to budgeted or forecasted costs) expressed in terms of utility costs and total resource costs, actual annual energy savings achieved (as opposed to forecasted energy savings), and nominal and real levelized costs per kWh.  Clearly identify any cost or savings figures that are estimates as opposed to actual measurements.  State all assumptions used in preparing estimates or in making calculations.

REQUEST NO. 3: Provide a copy of any management, monitoring, or evaluation plans prepared or utilized for the Agricultural Choices Program.  Discuss the “new” Agricultural Choices program element separately.

REQUEST NO. 4:  Explain how the Company has determined the energy savings actually achieved by the Agricultural Choices Program.

REQUEST NO. 5:  Has Idaho Power conducted any field tests or measurements intended to verify the forecasted energy savings for individual irrigation system retrofits made under the Agricultural Choices Program?  If so, provide a summary comparing forecasted and measured energy savings for each of the irrigation systems tested.

REQUEST NO. 6:  Provide copies of workpapers, reports, or any other information relied on by Idaho Power to verify the annual energy savings reported for the Agricultural Choices Program in the 1997 Conservation Plan.

REQUEST NO. 7:  Provide a summary by year for each component of the Agricultural Choices Program showing the number of irrigation system evaluations conducted in each year and the number of retrofits completed in each year.

REQUEST NO. 8:  Provide a comparison by year of the forecasted or targeted energy savings and the actual energy savings achieved by the Agricultural Choices Program.

REQUEST NO. 9:  Provide copies of any management, monitoring, or evaluation plans prepared or utilized for:

(a) the Commercial Lighting Efficiency programs;

(b) the Partners in Industrial Efficiency program;

(c) the Design Excellence Award program;

(d) the Manufactured Home Acquisition program; and

(e) the Low Income Weatherization program.

REQUEST NO. 10:  Provide copies of any progress reports, program evaluations, impact assessments, performance summaries or similar documents prepared for:

(a) the Commercial Lighting Efficiency programs;

(b) the Partners in Industrial Efficiency program;

(c) the Design Excellence Award program;

(d) the Manufactured Home Acquisition program; and

(e) the Low Income Weatherization program.

REQUEST NO. 11:  For each of the following programs provide a program history showing actual program cost (as opposed to budgeted or forecasted costs) expressed in terms of utility costs and total resource costs, actual energy savings achieved (as opposed to forecasted energy savings), and nominal and real levelized costs per kWh:

(a) the Commercial Lighting Efficiency programs;

(b) the Partners in Industrial Efficiency program;

(c) the Design Excellence Award program;

(d) the Manufactured Home Acquisition program; and

(e) the Low Income Weatherization program.

Clearly identify any cost or savings figures that are estimates as opposed to actual measurements.  State all assumptions used in preparing estimates and in making calculations.

DATED  at Boise, Idaho, this            day of April 1998.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Brad Purdy

Deputy Attorney General

Technical Staff:

Rick Sterling 1-8

Lynn Anderson 9-11

BP:rs/gdkumisc/prodreq/ipce9712.bpr