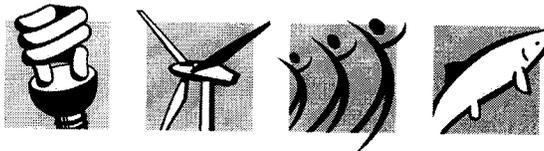


A World Institute for a Sustainable Humanity
 Advocates for the West
 Alaska Housing Finance Corporation
 Alliance to Save Energy
 Alternative Energy Resources Organization
 American Rivers
 Audubon Washington
 Bonneville Environmental Foundation
 Central Area Motivation Program
 Citizens' Utility Alliance
 Citizens' Utility Board of Oregon
 City of Ashland
 Clackamas County Weatherization
 Climate Solutions
 Climate Trust
 Cold Spring Conservancy
 Community Action Directors of Oregon
 Community Action Partnership Assoc. of Idaho
 Davenport Resources, LLC
 David Suzuki Foundation
 Earth and Spirit Council
 Emerald People's Utility District
 Energy Trust of Oregon
 Eugene Water and Electric Board
 Friends of the Earth
 Global Warming Action
 Golden Eagle Audubon Society
 Housing and Comm. Services Agency of Lane Co.
 Housing Authority Of Skagit County
 Human Resources Council, District XI
 Idaho Community Action Network
 Idaho Conservation League
 Idaho Consumer Affairs
 Idaho Rivers United
 Idaho Rural Council
 Idaho Wildlife Federation
 Interfaith Network of Earth Concerns
 Kootenai Environmental Alliance
 Kootenay-Okanagan Electric Consumers Association
 League of Utilities and Social Service Agencies
 League of Women Voters - ID
 League of Women Voters - OR
 League Of Women Voters - WA
 Metrocenter YMCA
 Missoula Urban Demonstration Project
 Montana Environmental Information Center
 Montana People's Action
 Montana Public Interest Research Group
 Montana River Action
 Montana Trout Unlimited
 The Mountaineers
 Multnomah County Weatherization
 National Center for Appropriate Technology
 Natural Resources Defense Council
 Northwest Energy Efficiency Council
 Northwest Resource Information Center
 Northwest Solar Center
 NW Sustainable Energy for Economic Development
 NW Natural
 Olympic Community Action Programs
 Opportunities Industrialization Center of WA
 Opportunity Council
 Oregon Action
 Oregon Energy Coordinators Association
 Oregon Energy Partnership
 Oregon Environmental Council
 Oregon HEAT
 Oregon State Public Interest Research Group
 Pacific Energy Innovation Association
 Pacific Northwest Regional Council of Carpenters
 Pacific Rivers Council
 Portland Energy Conservation, Inc.
 Portland General Electric
 PPM Energy
 Puget Sound Alliance for Retired Americans
 Puget Sound Energy
 Renewable Northwest Project
 Rocky Mountain Institute
 Salmon For All
 Save Our Wild Salmon Coalition
 Seattle Audubon Society
 Seattle City Light
 Sierra Club
 Sierra Club of British Columbia
 Snohomish County PUD
 Solar Energy Association of Oregon
 Solar Information Center
 Solar Washington
 South Central Community Action Partnership, Inc
 Southeast Idaho Community Action Agency
 Southern Alliance for Clean Energy
 Spokane Neighborhood Action Programs
 Tahoma Audubon Society
 Trout Unlimited
 Union Of Concerned Scientists
 United Steelworkers of America, District 11
 Washington Citizen Action
 WA CTED - Housing Division
 Washington Environmental Council
 Washington Public Interest Research Group
 WA State Assoc. of Community Action Agencies
 Washington State University - Energy Program
 Washington Wilderness Coalition
 Working for Equality and Economic Liberation
 Zikha Renewable Energy



NW Energy Coalition

for a clean and affordable energy future

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April 24, 2008

Jean Jewell
 Commission Secretary
 Idaho Public Utilities Commission
 472 West Washington
 Boise, ID 83702

Docket No. PAC-E-08-01

Ms. Jewell:

Please accept the following comments of the NW Energy Coalition on the application of Rocky Mountain Power (RMP) for an increase to the customer efficiency services rate adjustment and proposed changes to the Company's energy efficiency programs.

The NW Energy Coalition supports the RMP filing and urges the Commission to approve the tariff increase and programmatic enhancements with some recommendations.

Tariff Increase

The 2.2 percent proposed increase in the rider may seem dramatic yet in our view it reflects the latent opportunity to acquire energy savings. RMP has been under funding and under achieving energy savings and the time is ripe for a significant expansion of effort. Last year PacifiCorp released a comprehensive Demand Side Management assessment for its entire service territory. This assessment estimated achievable efficiency potential at 440 aMW of efficiency potential in three RMP states over 20 years. RMP states in its filing that it "hopes to achieve 13,140 MWh/year in energy savings", this modest level of savings is not possible without an increase in funding. That said, according to the Southwest Energy Efficiency Project¹, the DSM assessment significantly under estimates the cost-effective efficiency opportunities available throughout all PacifiCorp's service territories.

¹ Comments on PacifiCorp's DSM Potential Study, Howard Geller, SWEEP, August 24, 2007

Now is a vital time for RMP to ramp up its efficiency services and enhance program offerings. Rising energy prices and power plant construction costs make DSM programs even more cost effective and increase consumer interest in adopting these measures. The tariff increase is necessary to facilitate more extensive delivery of a broader array of efficiency programs that will help Rocky Mountain Power customers reduce their electricity bills. Previous funding levels were insufficient. There is nothing more frustrating to customers than seeing a promotion for a program and then being told that there is no longer adequate funding or there is a waiting list contingent upon future funding. This program delivery history can make ramping up and instilling customer confidence a challenge. The State of Idaho clearly recognized the opportunity for efficiency in meeting Idahoan's energy needs in the 2007 State Energy Plan and with the elevation of energy policy within state government with the establishment of the Office of Energy Resources. In addition, growing concern about global warming, energy stability and new power plant proposals have raised public awareness of and interest in cost saving energy efficiency.

While the funding increase is warranted it is a concern to see 50% of the two year funding going to purchase and maintain load control equipment for irrigation customers and no programmatic increase in a number of programs. Capacity savings are important and should be pursued and should be acquired in addition to capturing all cost-effective efficiency savings. Given the comments of SWEEP and the low level of historic DSM activity in the RMP Idaho service territory, the opportunity for higher energy savings levels is great.

The Coalition is concerned that there is no proposed increase in support for the low-income weatherization program. Given rising energy costs in general and even the modest increase in bills due to this tariff increase, it is good policy, at a minimum, to include a proportional increase in low-income weatherization funding.

In Attachment 3 of the Company's application the 2009 budget is shown as \$4,529,244 and the 2008 budget is shown as 4,825,061. It is not clear why there is a \$295,817 decrease in the budget for 2009 if the rider remains unchanged unless the Company projects a decline in customers.

Program Enhancements

As part of its approval of these new and expanded programs and increased funding, the Commission should make it clear that it will judge utility performance not on the expenditure of funds but on the savings acquired. The Coalition is pleased to see program evaluation built into the program budget. The Commission should ensure that the evaluation and verification of program savings and effectiveness are done by 3rd party evaluators and reported to the Commission.

To tap into customer willingness to undertake cost-effective energy efficiency measures and actions, RMP must market and promote its programs in a simple and compelling manner. Coalition allies in Utah support RMP's FinAnswer program but urged more aggressive marketing of this program as it is rolled out in Idaho..

While RMP provided information on programmatic changes to Schedule 118, Home Energy Savings, as an informational service to the Commission, I believe that RMP should expand this offering to include more incentives and education around a growing element of residential and commercial usage – plug loads. RMP should educate its residential and commercial customers to make them aware of plug load draw, to purchase lower power devices and how to use power management features. RMP should participate in national marketing and incentive programs such as the 80+ power supply program, ENERGY STAR PCs, monitors, TVs, TV signal converter boxes, battery chargers, and other ENERGY STAR electronic products. Electronic devices are evolving quickly and consumers make changes and upgrades on a similar pace. As a result, there will be many opportunities for cost-effective energy savings in the future and many ways for RMP to help customers capture these savings.

Thank you for your consideration of these comments. I am happy to participate further with the Commission in the ongoing review of implementation of these programs.

Sincerely,

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Policy Director
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206-621-0094