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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 )  
APPLICATION OF ROCKY MOUNTAIN )  
POWER FOR AUTHORITY TO )  
DECREASE THE CUSTOMER )  
EFFICIENCY SERVICES RATE )

CASE NO. PAC-E-12-11  
COMMENTS OF THE IDAHO  
CONSERVATION LEAGUE

The Idaho Conservation League (“ICL”) asks the Commission to deny Rocky Mountain Power’s (“RMP”) request to reduce the Customer Efficiency Services Rate, Schedule 191. The Commission has consistently described energy efficiency programs as “powerful tools customers can use to mitigate the impact of rate increases.” *Order No. 30560; Order No. 29026*. A robust suite of energy efficiency programs “provides benefits to non-participants by reducing the overall cost of serving new load. It also benefits all Idaho customers by reducing Idaho’s allocation of system power supply costs.” *Order No. 29952* at 9, PAC-E-05-10. To maximize customer benefits, the Commission has repeatedly instructed all Idaho utilities to “pursue all cost-effective energy efficiencies.” *Order No. 32426* at 21. In the face of ever-rising electric rates, Idahoans need access to these powerful tools more than ever before.

Ensuring Schedule 191 continues to provide sufficient funding to support growing efficiency programs benefits all customers. As described in more detail below, Schedule 191 is currently underfunded, meaning that customers owe RMP additional money for already incurred efficiency costs. RMP’s own studies reveal the current efficiency programs are cost effective and substantial amounts of additional savings are available. Further, RMP’s most recent Integrated Resource Plan (“IRP”) update includes several commitments to expand energy saving efforts that will increase the need for funding. In order to continue to reduce this negative back balance, and provide headroom for additional growth, ICL urges the Commission to maintain the current Schedule 191 rate.

**I. Schedule 191 is in back balance and the timing of paying this down is not clear.**

According to RMP's application, the Schedule 191 balancing account is negative, meaning customers owe RMP additional funds. *Application* at 1-2, *Attachment 2*. The timing of when this balance will change to a positive is not clear. Attachment 2 shows that on a cash basis the back balance will turn positive in July of 2012. *Id.* However, on an accrual basis, this back balance will not turn positive until July 2013. *Id.* Prior to making any change to the Schedule 191 rate the Commission should require RMP to clarify when they expect the back balance to be recovered.

As a policy matter, the Commission should avoid negative back balance because they impose additional costs on ratepayers. Whenever the back balance is negative, customers must pay RMP a carrying charge. Conversely, the Commission should encourage positive back balances for two reasons. First, ratepayers are protected because RMP pays a carrying charge for holding customer funds. Second, a positive back balance provides headroom for program growth, new programs, and signals, with actual money, an unwavering commitment to pursuing all available cost effective energy efficiency. Of course, the primary purpose of Schedule 191 is to fund the current portfolio of efficiency programs. But when the Commission initially approved RMP's schedule 191 the Staff commented "the Company should be allowed, and in fact is expected, to deviate from its portfolio whenever prudent and cost-effective DSM opportunities arise." *Order No. 29952* at 8. Because good policy supports allowing the Schedule 191 back balance to be positive, particularly when current efficiency programs should be growing, ICL urges the Commission to maintain the Schedule 191 rate.

RMP's funding projections for Schedule 191 only include "current expectations of the existing programs." *Exhibit 1, RMP Response to ICL Request 1*. However, RMP's own documents tend to show program cost will increase beyond these levels. For the Home Energy Saver Incentive Program RMP's application forecasts 2012 spending to be \$641,000 in 2012 and \$714,000 in 2013. *Application* at 8. However, RMP commissioned a cost effectiveness analysis the program that includes new, additional measures. *Exhibit 2, RMP Response to ICL Request 4*. This analysis shows the contemplated program changes would be cost effective, increase energy savings, and increase spending to \$754,856. *Id.* RMP expects to implement these improvements in August of 2012, which will increase energy efficiency spending above the projections used in this case. *Exhibit 1, RMP Response to ICL Request 5*. This program change will put further pressure on the Schedule 191 back balance. Because current program growth will exacerbate an

already unclear recovery of the negative back balance, ICL urges the Commission to maintain the current Schedule 191 rate.

## **II. RMP's studies and plans show substantial additional energy efficiencies are available.**

While the Commission has repeatedly admonished Idaho utilities to pursue all available cost effective energy efficiencies, quantifying this goal is difficult. Fortunately, RMP has three recent documents that describe the available cost effective efficiencies: the 2011 Energy Efficiency Report, the 2011 Energy Efficiency Potential Study, and the 2012 IRP Update. Combined these documents reveal that, while current programs are cost effective and available to all customer classes, the potential for additional energy savings is vast. Further, the IRP Update includes specific commitments to increase efficiencies during 2012 and 2013. Reducing Schedule 191 now, without considering the impact of these additional funding needs, is not in the public interest. Instead, allowing a positive back balance and directing RMP to expand their energy efficiency acquisition efforts serves the public interest.

Cost effectiveness is the primary criteria for customer funded energy efficiency programs. RMP's *2011 Energy Efficiency and Peak Reduction Annual Report* demonstrates that each current program is cost effective<sup>1</sup> as a total system resource, as well as from the perspective of the utility and the customers. Along with being cost effective, RMP's current portfolio provides a rough balance between customer classes in terms of revenues, expenses and energy savings. *2011 Energy Efficiency Report* at 34. This balance and the continued cost effectiveness of the programs provide a solid foundation for increasing energy efficiency activities.

The available energy efficiency potential is vast and current programs, while laudable, only acquire a fraction. RMP commissioned an energy efficiency potential study to inform their 2011 IRP.<sup>2</sup> For Idaho, the study quantified 63 aMW of "achievable technical potential" by 2030. *Potential Study* at 49, table 52. The achievable potential is calculated by assuming the state can acquire 82% of the technical potential, which is the same assumption used by the Northwest Power Planning and Conservation Council. *Id.* at 64 – 65. Of course, this is a long-term goal and only a portion of the potential can be acquired in any one year. To address this issue the study also quantifies the portion of the total potential RMP should expect to acquire in any one year,

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<sup>1</sup> ICL acknowledges the Low Income Weatherization Program results show the program is not cost effective as currently measured. This issue is currently under review in GNR-E-12-01.

<sup>2</sup> Cadmus, *Assessment of Long-Term, System-Wide Potential for Demand-Side and Other Supplemental Resources*, March 31, 2011. Available at: <http://www.pacificorp.com/es/dsm.html>.

the ramp rate. Idaho is considered a “normal state” and the ramp rate assumes acquiring 10% of the potential in 2011 and grows to 20% in 2013. *Id.* at 51, Figure 17. Applying the ramp rates to the potential results in an available, technical potential of 55,188,000 kwh of savings in 2011 and 110,376,000 kwh in 2013.<sup>3</sup> *Id.* Despite this huge potential, in 2011 RMP acquired 9,660,007 kwh, which is only 17.5% of the available energy savings for that year. *2011 IRP Report* at 4, Table 1. Instead of reducing energy efficiency funding levels, the Commission should order RMP to increase their energy savings acquisitions to achieve the available potential.

Admittedly, the potential study considered only the technical potential and not the costs of acquiring energy savings. RMP preforms this analysis in the IRP. *Potential Study* at ES-1. The 2012 IRP Update includes several commitments to expand energy efficiency programs beyond current levels. *IRP Update* at 62 – 63 (action item 6). These commitments include issuing a Request for Proposals for residential and small commercial energy savings in March 2012, following which RMP will “seek to acquire all cost-effective resources” identified and “promptly file for Commission approvals to implement the cost-effective programs.” *Id.* In addition, RMP committed to studying the potential for conservation voltage reduction on 40% of their circuits in 2012 and the remaining 60% in 2013 “provided the Company receives approval by the appropriate Commission for recovery of the study costs through the demand-side customer efficiency surcharge. *Id.* When asked if the funding projections for Schedule 191 include these new commitments, RMP responded they will request additional changes based on the outcome of these commitments. *Exhibit 1, RMP Reponses to ICL Request 1.* When the Commission initially approved Schedule 191 Staff said: “the Company should be allowed, and in fact is expected, to deviate from its portfolio whenever prudent and cost-effective DSM opportunities arise.” *Order No 29952* at 8. Instead of whipsawing the Schedule 191 rate up and down, the Commission should maintain the current rate pending the outcome of these studies.

## Conclusion

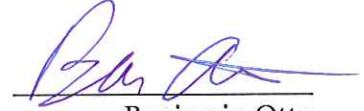
RMPs current energy efficiency portfolio is cost effective and the Company forecasts continued growth. Along with existing programs, RMP plans to initiate new programs to meet the Commission’s directive to pursue all available energy efficiency. As a policy matter, along with providing consistent funding levels, the Commission should discourage negative back

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<sup>3</sup> Calculated by taking the 63aMW potential, applying the ramp rates of 10% and 20%, then multiplying the result by 8,760 kwh per aMW.

balances and encourage positive back balances in Schedule 191. Accordingly denying RMP's request to reduce the Schedule 191 rate will serve the public interest in this case.

Respectfully submitted, this 24<sup>th</sup> day of July, 2012.



Benjamin Otto  
Idaho Conservation League

PAC-E-12-11/Rocky Mountain Power  
July 19, 2012  
IPUC ICL Data Request 1

### **IPUC ICL Data Request 1**

Please reference Action Item 6 in Rocky Mountain Power's 2011 Integrated Resource Plan Update, submitted to the Idaho PUC on April 2, 2012.

- a) Please provide all analysis or other documentation that demonstrates RMP's proposed reduction to Schedule 191 will provide sufficient funding to acquire all cost effective energy efficiency resources available in Idaho that may be identified by the "system-wide RFP for residential and small commercial sector savings issued in March 2012."
- b) Please provide all analysis or other documentation that demonstrates RMP's proposed reduction to Schedule 191 will provide sufficient funding to acquire all cost effective energy efficiency resources available from special contract customers in Idaho the Company expects to be included in the plan identified in this action item.
- c) Please provide all analysis or other documentation that demonstrates RMP's proposed reduction to Schedule 191 will provide sufficient funding to meet the "staffing levels to achieve programmatic cost effective energy efficiency targets established in this plan."
- d) Please provide all analysis or other documentation that demonstrates RMP's proposed reduction to Schedule 191 will provide sufficient funding for the Idaho portion of the Company's commitment to to "perform the high-level screening of 40 percent of its distribution circuits in each of the states to identify circuits where cost effective energy savings appears viable .... "

### **Response to ICL Data Request 1**

- a) The forecast is based on the Company's current expectation of the existing programs, as set out in the Company's tariff. This is consistent with the authority as noted in the "PURPOSE" explanation in Schedule 191: "The Customer Efficiency Service Rate Adjustment is designed to recover the costs incurred by the Company associated with Commission-approved demand-side management expenditures."

Should the RFP results in new programs and/or the expenses associated with the existing programs deviate significant from forecast; the Company will seek an additional change to Schedule 191.

- b) Please refer to Attachment ICL 1, which provides analysis of funding required to meet the current program expenditures.
- c) If approved the reduction in revenue from Schedule 191 will not impact staffing levels.
- d) As noted in the Company's response to the Idaho Conservation League's data request 1(a), only the costs associated with the delivery of Commission-

ICL Exhibit 1  
PAC-E-12-11

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approved demand side management expenditures are eligible for collection through Schedule 191.

Record holder: Carol Hunter  
Sponsor: To Be Determined

PAC-E-12-11/Rocky Mountain Power  
July 19, 2012  
IPUC ICL Data Request 5

**IPUC ICL Data Request 5**

Please explain, and provide any supporting analysis and documentation, how RMP projects future participation levels for each energy efficiency program available in Idaho.

**Response to ICL Data Request 5**

The Schedule 21 Low Income Weatherization Program reimbursements are capped at \$300,000 annually and assumed to remain in place through 2013. The average reimbursement per home billed by the agencies to Rocky Mountain Power was \$2,845 in 2011. With this baseline the participation estimate for 2012 and 2013 would calculate to 105 homes ( $\$300,000/\$2,845$ ).

The Schedule 118 Home Energy Saver Incentive Program participation projections are based on historic participation, market trends and potential program changes. From 2009-2011 participation ranged from around 4,600 to nearly 8,000 participants. With program changes expected to take effect on August 20, 2012, participation is expected to increase in 2012 and 2013 as demonstrated by the projected savings in the Attachment ICL 4 -1.

The Schedule 117 Residential Refrigerator Recycling Program participation projections are based on historic participation. Past participation for 2009 through 2011 averaged 741 recycled refrigerators and freezers. With revamped marketing efforts in 2012 and 2013 the program expects to increase participation.

The Schedule 115 FinAnswer Express Program participation projections are based on historic participation, market characterization studies and program changes made effective July 14, 2012. From 2009-2011 participation ranged between 46 and 72 participants. Based on program changes taking effect on July 14, 2012, participation is expected to show an increase in 2012 and 2013 as demonstrated by the projected savings in Attachment ICL 4 -2.

The Schedule 125 Energy FinAnswer Program and Schedule 155 Agricultural Energy Services participation projections are based on historic program participation. Energy FinAnswer Program participation for the 2009 through 2011 time period ranged between 8 and 14 and the Agricultural Energy Services Program participation for that same time period ranged between 150 and 250.

Other supporting documentation on expected participation is available in the Company's system-wide potential study, available on the Company's website at: <http://www.pacificorp.com/es/dsm.html>.

Record holder: Carol Hunter  
Sponsor: To Be Determined



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Memorandum

**To:** Don Jones, PacifiCorp/Rocky Mountain Power  
**From:** David Basak, Navigant  
**Date:** 06/04/2012  
**Re:** Idaho Home Energy Savings Program Cost-Effectiveness Results

This memo presents the cost effectiveness findings for the analysis of the Idaho Home Energy Savings (HES) Program. The memo addresses the following:

- **Avoided Costs:** The team performed an analysis using the *Residential Whole House* decrement cost scenario for "Medium" carbon streams provided in the 2011 PacifiCorp Integrated Resource Plan.
- **Modeling Inputs:** Navigant utilized individual measure savings and administration costs provided by PECE in the file *ID HES State Savings Summary\_06042012.xlsx*.
- **New/Revised measures:** Navigant ran benefit-cost tests for both the old and new/revised measures strictly for the program summary. The individual measure level results presented below only include the new/revised measures.
- **Benefit/Cost Tests:** Multiple benefit/cost tests are reported including; PacifiCorp Total Resource Cost Test (PTRC), Total Resource Cost Test (TRC), Utility Cost Test (UCT), Rate Impact Test (RIM), and Participant Cost Test (PCT).

This memo will begin by addressing the program level results which include the complete list of measures (old and new/revised) included in the Idaho HES program. The cost-effectiveness results are as follows:

Table 1 –Cost Effectiveness Analysis Inputs

Parameters	Values
Discount Rate for all B/C Tests	7.17%
Line Loss Factor - Energy (%)	9.96%
Residential Energy Rate (\$/kWh)	\$0.094
Inflation Rate	1.8%

Memorandum to Don Jones, PacifiCorp  
06/04/2012  
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**Table 2 – Idaho HES Overall Costs for PY 2012 (Old and New/Revised Measures)**

Idaho Home Energy Savings (HES) Program Year 2012	Incentives (\$)	Program Labor (\$)	Program Direct (\$)	Program Marketing Direct (\$)	P-Corp Admin (\$)	Total Program (\$)
Non-Lighting Measures	\$224,358	\$287,536	\$32,254	\$33,000	\$27,958	\$605,105
Lighting Measures	\$115,633	\$4,057	\$935	\$1,168	\$27,958	\$149,751
<b>Total Program Costs</b>	<b>\$339,991</b>	<b>\$291,593</b>	<b>\$33,189</b>	<b>\$34,168</b>	<b>\$55,915</b>	<b>\$754,856</b>

**Table 3 - Idaho HES Overall Gross/ Net Savings for PY 2012 (Old and New/Revised Measures)**

Idaho Home Energy Savings (HES) Program Year 2012	Gross Annual Energy Savings at site (kWh)	Net Annual Energy Savings at Site (kWh)
Non-Lighting Measures	712,449	601,639
Lighting Measures	1,316,892	1,081,336
<b>Total Program Costs</b>	<b>2,029,341</b>	<b>1,682,975</b>

**Table 4 - Idaho HES Cost-Effectiveness Summary for PY 2012 (Old and New/Revised Measures)**

Benefit/Cost Test Performed	Costs	Benefits	B/C Ratio
Total Resource Cost Test (PTRC)	\$1,114,925	\$1,482,630	1.33
Total Resource Cost Test (TRC)	\$1,114,925	\$1,347,846	1.21
Utility Cost Test (UCT)	\$754,856	\$1,347,846	1.79
Rate Impact Test (RIM)	\$2,200,784	\$1,347,846	0.61
Participant Cost Test (PCT)	\$360,069	\$2,078,242	5.77
Levelized Cost (\$/kWh)	\$14,210,789	\$1,114,925	0.08

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06/04/2012  
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The measure level benefit-cost results for program year 2012 are as follows:

Table 5: Measure Level Results for Program Year 2012 - Appliances

Idaho Home Energy Savings Program (HES) Appliances	TRC Benefits (\$)	TRC Costs (\$)	TRC Test	P-TRC Benefits (\$)	P-TRC Costs (\$)	P-TRC Test	Utility PV Benefits (\$)	Utility PV Costs (\$)	Utility Cost Test	Part. PV Benefits (\$)	Part. PV Costs (\$)	Part. Cost Test	Ratepayer PV Benefits (\$)	Ratepayer PV Costs (\$)	RIM Test
Clothes Washer (2.2 + MIEE)	\$108.68	\$151.79	0.7	\$119.54	\$151.79	0.8	\$108.68	\$50.00	2.2	\$182.71	\$101.79	1.8	\$108.68	\$164.13	0.7
MEF 2.2: CEE Tier 2+: Electric DHW & Electric Dryer	\$153.76	\$151.79	1.0	\$169.13	\$151.79	1.1	\$153.76	\$50.00	3.1	\$237.75	\$101.79	2.3	\$153.76	\$211.47	0.7
MEF 2.2: CEE Tier 2+: Electric DHW & Gas Dryer	\$71.08	\$151.79	0.5	\$78.19	\$151.79	0.5	\$71.08	\$50.00	1.4	\$136.80	\$101.79	1.3	\$71.08	\$124.65	0.6
MEF 2.2: CEE Tier 2+: Gas DHW & Electric Dryer	\$85.33	\$151.79	0.6	\$93.86	\$151.79	0.6	\$85.33	\$50.00	1.7	\$154.20	\$101.79	1.5	\$85.33	\$139.61	0.6
MEF 2.2: CEE Tier 2+: Gas DHW & Gas Dryer	\$2.58	\$151.79	0.0	\$2.84	\$151.79	0.0	\$2.58	\$50.00	0.1	\$53.16	\$101.79	0.5	\$2.58	\$52.71	0.0
Dishwasher	\$29.54	\$69.66	0.4	\$32.49	\$69.66	0.5	\$29.54	\$20.00	1.5	\$56.43	\$49.66	1.1	\$29.54	\$51.33	0.6
CEE Tier 1 (75 EE) Electric DHW	\$25.75	\$69.66	0.4	\$28.32	\$69.66	0.4	\$25.75	\$20.00	1.3	\$51.75	\$49.66	1.0	\$25.75	\$47.31	0.5
CEE Tier 1 (75 EE) Gas DHW	\$33.61	\$69.66	0.5	\$36.97	\$69.66	0.5	\$33.61	\$20.00	1.7	\$61.45	\$49.66	1.2	\$33.61	\$55.65	0.6
Evaporative Cooling - Permanent	\$409.15	-\$1,388.10	0.0	\$450.06	-\$1,388.10	0.0	\$409.15	\$150.00	2.7	\$589.70	-\$1,538.10	0.0	\$409.15	\$470.98	0.9
Evaporative Cooling - Portable	\$72.99	\$139.20	0.5	\$80.29	\$139.20	0.6	\$72.99	\$50.00	1.5	\$123.80	\$89.20	1.4	\$72.99	\$109.04	0.7
Electric Water Heater	\$94.59	\$55.56	1.7	\$104.05	\$55.56	1.9	\$94.59	\$50.00	1.9	\$165.33	\$5.56	29.7	\$94.59	\$149.19	0.6
Room AC	\$24.64	\$36.00	0.7	\$27.10	\$36.00	0.8	\$24.64	\$20.00	1.2	\$47.67	\$16.00	3.0	\$24.64	\$39.93	0.6
Refrigerator	\$86.07	\$66.18	1.3	\$94.68	\$66.18	1.4	\$86.07	\$40.00	2.2	\$145.58	\$26.18	5.6	\$86.07	\$130.80	0.7
Freezer	\$94.70	\$21.51	4.4	\$104.17	\$21.51	4.8	\$94.70	\$20.00	4.7	\$136.17	\$1.51	90.0	\$94.70	\$119.90	0.8
Heat Pump Water Heater	\$876.65	\$838.35	1.0	\$964.32	\$838.35	1.2	\$876.65	\$400.00	2.2	\$1,468.88	\$438.35	3.4	\$876.65	\$1,319.24	0.7
CFL Fixture	\$35.58	\$17.20	2.1	\$39.14	\$17.20	2.3	\$35.58	\$20.00	1.8	\$62.94	-\$2.80	0.0	\$35.58	\$56.93	0.6
LED Fixture	\$20.22	\$17.20	1.2	\$22.25	\$17.20	1.3	\$20.22	\$20.00	1.0	\$44.41	-\$2.80	0.0	\$20.22	\$40.99	0.5

Table 6: Measure Level Results for Program Year 2012 - Weatherization

Idaho Home Energy Savings Program (HES) Weatherization	TRC Benefits (\$)	TRC Costs (\$)	TRC Test	P-TRC Benefits (\$)	P-TRC Costs (\$)	P-TRC Test	Utility PV Benefits (\$)	Utility PV Costs (\$)	Utility Cost Test	Part. PV Benefits (\$)	Part. PV Cost (\$)	Part. PV Cost Test	Ratepayer PV Benefits (\$)	Ratepayer PV Costs (\$)	RIM Test
Installed Insulation - Attic - Electric (R-49)	\$1.68	\$0.57	2.9	\$1.85	\$0.57	3.2	\$1.68	\$0.50	3.4	\$2.44	\$0.07	32.9	\$1.68	\$2.19	0.8
Electric FAF Heating System	\$1.50	\$0.58	2.6	\$1.65	\$0.58	2.9	\$1.50	\$0.50	3.0	\$2.53	\$0.08	32.5	\$1.50	\$2.27	0.7
Heat Pump Heating System	\$1.23	\$0.58	2.1	\$1.36	\$0.58	2.3	\$1.23	\$0.50	2.5	\$2.01	\$0.08	25.8	\$1.23	\$1.81	0.7
Zonal Heating System	\$1.32	\$0.58	2.3	\$1.45	\$0.58	2.5	\$1.32	\$0.50	2.6	\$2.29	\$0.08	29.4	\$1.32	\$2.06	0.6
Installed Insulation - Attic - Gas Heat w/CAC (R-49)	\$0.01	\$0.58	0.0	\$0.01	\$0.58	0.0	\$0.01	\$0.08	0.2	\$0.10	\$0.50	0.2	\$0.01	\$0.09	0.1
Insulation - Attic - Electric - Self Install	\$1.68	\$0.29	5.9	\$1.85	\$0.29	6.4	\$1.68	\$0.25	6.7	\$2.19	\$0.04	59.1	\$1.68	\$1.94	0.9
Electric FAF Heating System	\$1.50	\$0.29	5.2	\$1.65	\$0.29	5.7	\$1.50	\$0.25	6.0	\$2.28	\$0.04	61.5	\$1.50	\$2.02	0.7
Heat Pump Heating System	\$1.23	\$0.29	4.3	\$1.36	\$0.29	4.7	\$1.23	\$0.25	4.9	\$1.76	\$0.04	47.3	\$1.23	\$1.56	0.8
Zonal Heating System	\$1.32	\$0.29	4.6	\$1.45	\$0.29	5.1	\$1.32	\$0.25	5.3	\$2.04	\$0.04	55.0	\$1.32	\$1.81	0.7
Insulation - Attic - Gas Self Install	\$0.01	\$0.29	0.0	\$0.01	\$0.29	0.0	\$0.01	\$0.08	0.2	\$0.10	\$0.21	0.5	\$0.01	\$0.09	0.1
Installed Insulation - Floor	\$3.07	\$1.19	2.6	\$3.38	\$1.19	2.8	\$3.07	\$0.50	6.1	\$4.05	\$0.69	5.9	\$3.07	\$3.59	0.9
Electric FAF Heating System	\$2.69	\$1.19	2.3	\$2.96	\$1.19	2.5	\$2.69	\$0.50	5.4	\$4.14	\$0.69	6.0	\$2.69	\$3.67	0.7
Heat Pump Heating System	\$1.63	\$1.19	1.4	\$1.79	\$1.19	1.5	\$1.63	\$0.50	3.3	\$2.49	\$0.69	3.6	\$1.63	\$2.23	0.7
Zonal Heating System	\$2.57	\$1.19	2.2	\$2.82	\$1.19	2.4	\$2.57	\$0.50	5.1	\$3.98	\$0.69	5.8	\$2.57	\$3.53	0.7
Installed Insulation - Floor - Self Install	\$3.07	\$0.60	5.2	\$3.38	\$0.60	5.7	\$3.07	\$0.25	12.3	\$3.80	\$0.35	11.0	\$3.07	\$3.34	0.9
Electric FAF Heating System	\$2.69	\$0.60	4.5	\$2.96	\$0.60	5.0	\$2.69	\$0.25	10.7	\$3.89	\$0.35	11.3	\$2.69	\$3.42	0.8
Heat Pump Heating System	\$1.63	\$0.60	2.7	\$1.79	\$0.60	3.0	\$1.63	\$0.25	6.5	\$2.24	\$0.35	6.5	\$1.63	\$1.98	0.8
Zonal Heating System	\$2.57	\$0.60	4.3	\$2.82	\$0.60	4.7	\$2.57	\$0.25	10.3	\$3.73	\$0.35	10.8	\$2.57	\$3.28	0.8
Installed Insulation - Wall	\$3.63	\$0.84	4.3	\$4.00	\$0.84	4.7	\$3.63	\$0.65	5.6	\$4.85	\$0.19	25.0	\$3.63	\$4.31	0.8
Electric FAF Heating System	\$3.25	\$0.84	3.9	\$3.58	\$0.84	4.2	\$3.25	\$0.65	5.0	\$5.06	\$0.19	26.1	\$3.25	\$4.49	0.7
Heat Pump Heating System	\$2.62	\$0.84	3.1	\$2.88	\$0.84	3.4	\$2.62	\$0.65	4.0	\$3.84	\$0.19	19.8	\$2.62	\$3.43	0.8
Zonal Heating System	\$2.83	\$0.84	3.4	\$3.11	\$0.84	3.7	\$2.83	\$0.65	4.4	\$4.49	\$0.19	23.2	\$2.83	\$3.99	0.7
Gas Heat w/CAC	\$0.01	\$0.84	0.0	\$0.01	\$0.84	0.0	\$0.01	\$0.20	0.1	\$0.22	\$0.64	0.3	\$0.01	\$0.21	0.1
Windows Tier 1 (U-0.30)	\$3.10	\$0.77	4.0	\$3.41	\$0.77	4.4	\$3.10	\$1.50	2.1	\$5.08	-\$0.73	0.0	\$3.10	\$4.62	0.7
Electric FAF Heating System	\$2.78	\$0.77	3.6	\$3.05	\$0.77	3.9	\$2.78	\$1.50	1.9	\$5.27	-\$0.73	0.0	\$2.78	\$4.78	0.6
Heat Pump Heating System	\$2.23	\$0.77	2.9	\$2.46	\$0.77	3.2	\$2.23	\$1.50	1.5	\$4.23	-\$0.73	0.0	\$2.23	\$3.87	0.6
Zonal Heating System	\$2.42	\$0.77	3.1	\$2.66	\$0.77	3.4	\$2.42	\$1.50	1.6	\$4.78	-\$0.73	0.0	\$2.42	\$4.36	0.6
Windows Tier 2 (U-0.22)	\$7.68	\$1.96	3.9	\$8.45	\$1.96	4.3	\$7.68	\$3.00	2.6	\$11.89	-\$1.04	0.0	\$7.68	\$10.73	0.7
Electric FAF Heating System	\$6.88	\$1.96	3.5	\$7.57	\$1.96	3.9	\$6.88	\$3.00	2.3	\$12.34	-\$1.04	0.0	\$6.88	\$11.72	0.6
Heat Pump Heating System	\$5.60	\$1.96	2.9	\$6.16	\$1.96	3.1	\$5.60	\$3.00	1.9	\$9.84	-\$1.04	0.0	\$5.60	\$8.95	0.6
Zonal Heating System	\$5.99	\$1.96	3.1	\$6.58	\$1.96	3.4	\$5.99	\$3.00	2.0	\$11.12	-\$1.04	0.0	\$5.99	\$10.06	0.6

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Table 7: Measure Level Results for Program Year 2012 – HVAC/Weatherization and HVAC/Lighting

Idaho Home Energy Savings Program (HES) HVAC/Weatherization and HVAC/Lighting	TRC Benefits (\$)	TRC Costs (\$)	TRC Test	P-TRC Benefits (\$)	P-TRC Costs (\$)	P-TRC Test	Utility PV Benefits (\$)	Utility PV Costs (\$)	Utility Cost Test	Part. PV Benefits (\$)	Part. PV Cost (\$)	Part. Cost Test	Ratepayer PV Benefits (\$)	Ratepayer PV Costs (\$)	RIM Test
Central Air Conditioning – 15+SEER/12.5 EER	\$90.45	\$338.92	0.3	\$99.50	\$338.92	0.3	\$90.45	\$150.00	0.6	\$246.04	\$188.92	1.3	\$90.45	\$221.07	0.4
Heat Pump Tune-Up	\$200.29	\$193.50	1.0	\$220.32	\$193.50	1.1	\$200.29	\$125.00	1.6	\$402.48	\$68.50	5.9	\$200.29	\$363.63	0.6
Duct Sealing & Insulation - Electric	\$3,739.47	\$694.88	5.4	\$4,133.42	\$694.88	5.9	\$3,739.47	\$450.00	8.3	\$4,944.10	\$244.88	20.2	\$3,739.47	\$4,314.93	0.9
Duct Sealing & Insulation - Electric FAF w/ CAC	\$3,431.26	\$694.88	4.9	\$3,774.39	\$694.88	5.4	\$3,431.26	\$450.00	7.6	\$4,573.69	\$244.88	18.7	\$3,431.26	\$3,996.38	0.9
Duct Sealing & Insulation - Electric FAF w/o CAC	\$3,328.87	\$694.88	4.8	\$3,661.75	\$694.88	5.3	\$3,328.87	\$450.00	7.4	\$4,450.63	\$244.88	18.2	\$3,328.87	\$3,890.55	0.9
Duct Sealing & Insulation - Electric Heat Pump	\$4,371.25	\$694.88	6.3	\$4,808.38	\$694.88	6.9	\$4,371.25	\$450.00	9.7	\$5,703.37	\$244.88	23.3	\$4,371.25	\$4,967.90	0.9
Duct Sealing & Insulation - Gas FAF w/ CAC	\$102.40	\$694.88	0.1	\$112.63	\$694.88	0.2	\$102.40	\$200.00	0.5	\$323.06	\$494.88	0.7	\$102.40	\$305.83	0.3
Duct Sealing Only - Pre-Insulated Ducts	\$2,188.19	\$462.68	4.7	\$2,407.00	\$462.68	5.2	\$2,188.19	\$250.00	8.8	\$2,879.76	\$212.68	13.5	\$2,188.19	\$2,511.60	0.9
Duct Sealing & Insulation - Electric FAF w CAC	\$2,229.14	\$462.68	4.8	\$2,452.06	\$462.68	5.3	\$2,229.14	\$250.00	8.9	\$2,928.99	\$212.68	13.8	\$2,229.14	\$2,553.93	0.9
Duct Sealing & Insulation - Electric FAF w/o CAC	\$2,189.21	\$462.68	4.7	\$2,408.13	\$462.68	5.2	\$2,189.21	\$250.00	8.8	\$2,880.99	\$212.68	13.5	\$2,189.21	\$2,512.65	0.9
Duct Sealing & Insulation - Electric Heat Pump	\$2,108.32	\$462.68	4.6	\$2,319.15	\$462.68	5.0	\$2,108.32	\$250.00	8.4	\$2,783.78	\$212.68	13.1	\$2,108.32	\$2,429.05	0.9
Heat Pump Upgrade to 8.5 HSPF with Best practice	\$2,909.95	\$1,467.85	2.0	\$3,200.95	\$1,467.85	2.2	\$2,909.95	\$700.00	4.2	\$4,389.30	\$767.85	5.7	\$2,909.95	\$3,872.79	0.8
Heat Pump Upgrade to 9.0 HSPF with Best practice	\$3,094.37	\$1,476.88	2.1	\$3,403.81	\$1,476.88	2.3	\$3,094.37	\$800.00	3.9	\$4,723.11	\$676.88	7.0	\$3,094.37	\$4,173.87	0.7
Heat Pump Upgrade to 8.5 HSPF (Tier 1)	\$4,782.30	\$2,962.23	1.6	\$5,260.53	\$2,962.23	1.8	\$4,782.30	\$700.00	6.8	\$6,763.10	\$2,262.23	3.0	\$4,782.30	\$5,914.26	0.8
Heat Pump Upgrade to 9.0 HSPF (Tier 1)	\$5,029.81	\$2,378.06	2.1	\$5,532.79	\$2,378.06	2.3	\$5,029.81	\$700.00	7.2	\$7,076.90	\$1,678.06	4.2	\$5,029.81	\$6,184.13	0.8
Tier 1 Convert EFAF W/CAC to 8.5 HSPF ASHP	\$4,534.79	\$3,546.39	1.3	\$4,988.27	\$3,546.39	1.4	\$4,534.79	\$700.00	6.5	\$6,449.30	\$2,846.39	2.3	\$4,534.79	\$5,644.40	0.8
Tier 1 Convert EFAF WO/CAC to 8.5 HSPF ASHP	\$5,261.79	\$4,439.11	1.2	\$5,787.97	\$4,439.11	1.3	\$5,261.79	\$800.00	6.6	\$7,471.01	\$3,639.11	2.1	\$5,261.79	\$6,537.07	0.8
Tier 2 Convert EFAF W/CAC to 9.0 HSPF ASHP	\$5,509.30	\$3,854.94	1.4	\$6,060.23	\$3,854.94	1.6	\$5,509.30	\$800.00	6.9	\$7,784.81	\$3,054.94	2.5	\$5,509.30	\$6,806.93	0.8
Tier 2 Convert EFAF WO/CAC to 9.0 HSPF ASHP	\$5,014.28	\$5,023.27	1.0	\$5,515.71	\$5,023.27	1.1	\$5,014.28	\$800.00	6.3	\$7,157.21	\$4,223.27	1.7	\$5,014.28	\$6,267.20	0.8
Best Practices Installation and Proper Sizing	\$2,614.88	\$370.07	7.1	\$2,876.37	\$370.07	7.8	\$2,614.88	\$250.00	10.5	\$3,565.20	\$120.07	29.7	\$2,614.88	\$3,101.07	0.8
Ductless Heat Pump	\$3,397.21	\$2,930.02	1.2	\$3,736.93	\$2,930.02	1.3	\$3,397.21	\$800.00	4.2	\$5,107.05	\$2,130.02	2.4	\$3,397.21	\$4,504.06	0.8
95% Gas Furnace w/ECM Blower	\$429.14	\$344.00	1.2	\$472.05	\$344.00	1.4	\$429.14	\$250.00	1.7	\$860.57	\$94.00	9.2	\$429.14	\$775.09	0.6
GSHF Upgrade from ASHP	\$4,563.91	\$10,915.98	0.4	\$5,020.30	\$10,915.98	0.5	\$4,563.91	\$700.00	6.5	\$6,486.21	\$10,215.98	0.6	\$4,563.91	\$5,676.14	0.8
GSHF Conversion from FAF w/o CAC	\$12,157.16	\$14,761.04	0.8	\$13,372.87	\$14,761.04	0.9	\$12,157.16	\$1,100.00	11.1	\$16,513.09	\$13,661.04	1.2	\$12,157.16	\$14,355.26	0.8
Heat Pump Conversion Bundle	\$13,405.20	\$6,075.26	2.2	\$14,745.72	\$6,075.26	2.4	\$13,405.20	\$2,350.00	5.7	\$19,277.19	\$3,725.26	5.2	\$13,405.20	\$16,907.38	0.8
Heat Pump Upgrade Bundle	\$8,469.66	\$3,478.59	2.4	\$9,316.63	\$3,478.59	2.7	\$8,469.66	\$2,100.00	4.0	\$12,794.91	\$1,378.59	9.3	\$8,469.66	\$11,297.63	0.7
Ductless Heat Pump Bundle	\$4,638.69	\$3,501.23	1.3	\$5,102.56	\$3,501.23	1.5	\$4,638.69	\$1,750.00	2.7	\$7,586.32	\$1,751.23	4.3	\$4,638.69	\$6,769.24	0.7
Gas Furnace w/AC Bundle	\$769.69	\$2,003.97	0.4	\$846.65	\$2,003.97	0.4	\$769.69	\$1,000.00	0.8	\$2,099.58	\$1,003.97	2.1	\$769.69	\$1,945.64	0.4
LEDs	\$13.78	\$26.74	0.5	\$15.16	\$26.74	0.6	\$13.78	\$10.00	1.4	\$27.02	\$16.74	1.6	\$13.78	\$24.47	0.6
LED General Purpose Lamp	\$13.50	\$26.75	0.5	\$14.85	\$26.75	0.6	\$13.50	\$10.00	1.3	\$26.67	\$16.75	1.6	\$13.50	\$24.17	0.6
LED Specialty Lamp	\$9.36	\$23.66	0.4	\$10.29	\$23.66	0.4	\$9.36	\$6.00	1.6	\$17.55	\$17.66	1.0	\$9.36	\$15.82	0.6
LED Downlight (Specialty) Lamp	\$20.35	\$29.82	0.7	\$22.39	\$29.82	0.8	\$20.35	\$10.00	2.0	\$35.14	\$19.82	1.8	\$20.35	\$31.37	0.6
CFL General Purpose Lamp	\$5.17	\$2.34	2.2	\$5.68	\$2.34	2.4	\$5.17	\$1.63	3.2	\$8.40	\$0.71	11.9	\$5.17	\$7.39	0.7
CFL Specialty Lamp	\$6.19	\$4.27	1.5	\$6.81	\$4.27	1.6	\$6.19	\$2.29	2.7	\$10.41	\$1.98	5.3	\$6.19	\$9.19	0.7

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of July, 2012, I delivered true and correct copies of the foregoing COMMENTS OF THE IDAHO CONSERVATION LEAGUE to the following persons via the method of service noted:

Hand delivery:

Jean Jewell  
Commission Secretary (Original and seven copies provided)  
Idaho Public Utilities Commission  
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Benjamin J. Otto

