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IDAHO PUBLIC
UTILITIES COMMISSION
PAC-E-13-10

Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

Dear Sirs,

I am taking this opportunity to comment on Rocky Mountain Power's rate case PAC-E-13-10. As an irrigator, I am concerned that this is a move by Rocky Mountain Power (RMP) to eliminate another program designed to help the irrigators. As an irrigator, I am required to pay into the "Customer Efficiency Services" Fund each and every power bill. Now it appears that RMP is removing access of the irrigator from using those funds to make improvements to their systems. To me this sounds like now I will be paying for something I am not allowed to use.

The current rate for "Customer Efficiency Services" is effectively a 2.1% tax on all other charges. I have been told that the "Customer Efficiency Services" is a cost saver in the long run by promoting energy savings system wide and slowing the need for new generation capacity. But if the consumer isn't allowed access to incentives to become more efficient then what is the purpose of the "Customer Efficiency Services" fund we are paying in to? Do you have oversight of these funds? Or are the funds from the "Customer Efficiency Services" being placed in the RMP general account and used to increase their profit margin?

Section 1 of the current program allows for exchange of gaskets and nozzles of irrigation equipment. The proposal wholly does away with this section. Section 2 of the program allows for cost share of replacing regulators and nozzles on pivots and Linears. The Proposal steps away from the incentive and RMP states that they will have engineers evaluate on a case by case basis. I fear that all moneys will go to pay for engineering studies and there won't be any funds left to cost share with the irrigators. Are there any guarantees that RMP will be paying for anything other than engineering studies? Yes, it is nice that RMP will pay for the engineering studies, but in reality I as a rate payer am paying for these studies whether or not I use them myself. Wouldn't it be more cost effective for the consumer to pay for the engineering studies and keep RMP in the business of supplying power rather than shifting money between rate payers while taking a fee for providing the service?

For example: I paid \$15,819.39 in power costs to RMP to irrigate my farm in 2012, of that \$325.37 was "Customer Efficiency Services" charges. I have been farming this piece of land since 2006 so if we were to round down to \$300 a year, I have paid \$2100 into the program. This year I placed a new pivot package on, it cost \$2917.66. I am still waiting for RMP to approve the new package and issue an incentive check. If approved the incentive check will be for \$900. So I have paid \$2100 into a "Savings

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account" that I am maybe allowed to withdraw \$900. I will be paying another \$300 plus into the system this year with limited chance of every seeing any of it again. If someone could explain how this is a good deal for me as a rate payer I would like to hear it.

I would urge the PUC to reject the proposed changes by RMP. If that isn't possible because of constraints placed on the PUC I would like to propose a review of the "Customer Efficiency Services" funds. I realize regulating power companies is a complicated affair, but as a consumer I have felt abused by the system ever since the last ownership change. Maybe as consumers we need to be better informed as to the use of these funds, but I continue to witness monies spent on bird protectors that fall off the next week rather than on maintenance on the system. In Howe I have seen no regular maintenance, the only time we see RMP personnel is when the power is out and repairs are needed or when the meter reader is about. RMP claims to be a low cost energy provider, but when I compare rates they are the most expensive one in the region. Who do we look to for relief? Thank you for this opportunity to submit comments.

Sincerely,



David R. Callister

CC. Senator Jeff Siddoway, Representative Jo An Wood and Representative Paul Romrell