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December 4, 2018

Ms. Diane Hanian  
Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, ID 83702

Re: PAC-E-18-07

Dear Ms. Hanian:

Please find enclosed for filing the original and seven copies PacifiCorp Idaho Industrial Customers Comments filed today in the above referenced case.

Thank you for your assistance in this matter. Please feel free to give me a call should you have any questions.

Sincerely,



Ronald L. Williams  
Williams Bradbury, P.C.  
Attorneys for PIIC

RLW  
Enclosures

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Attorney for PIIC

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF ROCKY MOUNTAIN )  
POWER'S APPLICATION FOR )  
DETERMINATION OF 2016 AND )  
DEMAND-SIDE MANAGEMENT )  
EXPENSES AS PRUDENTLY INCURRED )  
\_\_\_\_\_ )

Case No. PAC-E-18-07

COMMENTS OF PACIFICORP IDAHO  
INDUSTRIAL CUSTOMERS

Pursuant to the Order 34175 in the above captioned matter, PacifiCorp Idaho Industrial Customers ("PIIC") hereby submits these comments to the Idaho Public Utilities Commission (the "Commission") regarding Rocky Mountain Power's ("RMP" or the "Company") Application for Prudency Determination on Demand-Side Management Expenditures.

**I. COMMENTS**

PIIC appreciates the opportunity to comment on RMP's Demand Side Management Reports for 2016 and 2017, as attached to the Company's application. In summary, PIIC does not dispute the prudence of PacifiCorp's demand side management expenditures for 2016 and 2017. PIIC is, however, concerned with the Schedule 191 balancing account balance.

As noted in Paragraph 4 in the Application of the Demand Side Management report, RMP provided in detail the balancing account activity associated with Schedule 191 for the respective plan years. The Schedule 191 balancing account activity through 2017 may be found in Tables 1 and 2 (Page 4) of the Application. The Company's total demand side management

costs for both plan years was \$8,478,955 (\$4,509,400 for 2016 and \$3,969,555 for 2017). That compares to total Schedule 191 collections of \$10,205,456 in the same period (\$4,995,153 for 2016 and \$3,969,555 for 2017). Thus, the Company over collected demand side management expenditures over the respective plan years. On a cash basis, the Schedule 191 balancing account had accumulated a surplus of \$1,326,350 due to customers as of December 31, 2017, and additional funds have been continuing to accumulate in the account through 2018.

PIIC understands that RMP has, subsequent to filing the Application in this case, proposed to reduce Schedule 191 collection rates from 2.7% to 2.25%, in Case No. PAC-E-18-12. Accordingly, PIIC will address issues related to the Schedule 191 collection rate in Case No. PAC-E-18-12.

Based on PIIC's review in this docket, the cause of the over-collection in 2016 and 2017 goes back to Case PAC-E-16-02, where PacifiCorp proposed to increase the rate from 2.1% to 2.7% to address a deficit that had accrued to the Schedule 191 balancing account at the end of 2015. As a result of the new rate, the account deficit was quickly eliminated and instead began to accrue balances due to customers.

## **II. CONCLUSION**

As noted above, PIIC does not contest the prudence of RMP's demand side management expenditures, as presented in the Company's application. PIIC is concerned with the growing balancing account balance, which PIIC will address in Case No. PAC-E-18-12, if necessary.

Dated this 4th day of December, 2018.

Respectfully submitted,



Ronald L. Williams  
Williams Bradbury, P.C.  
Attorneys for PIIC

## CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 4<sup>th</sup> day of December, 2018, I caused to be served a true and correct copy of the foregoing document upon the following individuals in the manner indicated below:

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