

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1675**

In the Matter of)
)
IDAHO POWER COMPANY,)
)
2015 Annual Smart Grid Report)
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COMMENTS OF THE
CITIZENS' UTILITY BOARD OF OREGON

November 13, 2015



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1 CUB appreciates the opportunity to comment on Idaho Power’s 2015 Annual
2 Smart Grid Report. Last year, Idaho Power submitted a robust narrative of its current
3 projects and what it envisions for the future. This year, the Company has once again
4 submitted a quality report with mostly appropriate updates, creative projects, and useful
5 application of its technology. The reader is given a clear view of what the Company is
6 doing and where it is going. Below CUB will expound on areas it found interesting in the
7 report, in addition to a few areas where the Company should provide more details.

8 **Idaho Power Easily Outshines its Peer Utilities**

9 CUB understands that the majority of Idaho Power’s smart grid undertakings
10 serve its Idaho customers. However, providing insight in what it is doing in Idaho is
11 useful, and the Company discusses Oregon applications where appropriate—for example,

1 the Company mentions that it installed 18,000 smart meters in its Oregon service
2 territory.¹ Idaho Power provides some notable updates to its report, informing
3 stakeholders how it has progressed in its smart grid endeavors throughout the year. In
4 particular, CUB notes the relatively substantial update to its conservation voltage
5 reduction (CVR) program, beginning on p. 11. The update includes estimated costs,
6 benefits, and expected changes to the Idaho system. The update gives the reader a good
7 idea of what the Company expects out of the project.

8 In general, the Company provides an informative picture of how its projects have
9 progressed over the past year, and CUB appreciates the clarity. Other areas in which
10 CUB believes the Company provided quality updates and should apply the same
11 endeavors in future reports include the following:

- 12 • The Company’s efforts in reaching out to customers through MyAccount, an online
13 platform in which customers can view their energy usage, bills, and engage in other
14 transactions. CUB first encountered the scope of this project at a Special Public
15 Meeting earlier this year when the Company delivered a presentation that included
16 MyAccount’s mobile version.² Though the Company has indicated in its report that it
17 “does not currently have established systems to proactively engage customers or
18 personalize thresholds for the customer,”³ it has still created a mobile website for ease
19 of use for its customers and has made other attempts through social media to engage
20 customers. One of these efforts, such as the online outage map, is a simple but useful
21 graphic continuously displayed on the Company’s social media pages. This effort has

¹ UM 1675 – Idaho Power 2015 Smart Grid Report, p. 19.

² February 20, 2015.

³ UM 1675 – Idaho Power 2015 Smart Grid Report, p. 49.

1 come at no extra cost to the Company.⁴ CUB values the thoughtful details Idaho
2 Power provides that demonstrates its efforts in reaching out to customers despite not
3 having the technology in place to make more granular engagement a possibility.

4 • The Company appears to be engaging in developments that might benefit the entire
5 industry, and not just Idaho Power. For example, the Company describes a substation
6 project that utilizes fiber optics (as opposed to copper wires) to connect the control
7 building to its substations. The Company states that the benefit of the project is such
8 that “Once demonstrated, not only will this technology potentially reduce costs for
9 Idaho Power and its customers in future installations by decreasing the amount of
10 copper wire installed, but it could prompt industry-wide adoption of this approach.”⁵

11 The Company also estimated the cost of this project to be roughly \$95,000.⁶ CUB
12 appreciates the forward-thinking attitude and inclusion of the costs of the project.

13 • Additional creativity regarding a number of Idaho Power’s projects—for example, the
14 ice-based thermal energy storage (TES).⁷ This is essentially a load-shifting project
15 where ice is made during off-peak hours to be used for air conditioning during on-
16 peak hours. The Company also lists expected costs of the project to be \$100,000.⁸

17 • CUB enjoyed reading additional details regarding Idaho Power’s solar parking lot
18 project. This is a project in which the Company switched out high-pressure sodium
19 lighting with more energy-efficient LEDs. CUB appreciated seeing a visual
20 representation of the project, both in terms of a graph presenting the decline in energy

⁴ UM 1675 – Idaho Power 2015 Smart Grid Report, Appendix D, p. 4.

⁵ UM 1675 – Idaho Power 2015 Smart Grid Report, pp. 39&40.

⁶ UM 1675 – Idaho Power 2015 Smart Grid Report, Appendix D, p. 7.

⁷ UM 1675 – Idaho Power 2015 Smart Grid Report, p. 46.

⁸ UM 1675 – Idaho Power 2015 Smart Grid Report, Appendix D, p. 9.

1 usage and a picture of a parking lot itself.⁹ CUB also notes that the project was
2 financed by shareholders, at zero cost to ratepayers.¹⁰ CUB feels that additional
3 details like these enhance the report and demonstrate that the Company is proactively
4 thinking about smart grid applications.

5 In general, CUB feels that the Company has enhanced the report by providing additional
6 information in a relevant way.

7 **Areas Idaho Power Can Shine Brighter**

8 Despite turning in a robust report, there were a few areas in the report that were
9 unclear to CUB, or CUB noticed that the Company could have expounded more on what
10 it is doing:

- 11 • The Transmission Situational Awareness Peak Reliability Coordinator Hosted
12 Advanced Application. Idaho Power stated that the hardware and applications for
13 remote support “were installed at Idaho Power in 2014,”¹¹ but beyond that the
14 Company does not provide much more information about this project beyond
15 what it already stated in the 2014 Smart Grid Report. The Company states in its
16 2015 report that the project costs \$75,000 annually,¹² so CUB would like to see
17 more content in terms of how the Company is utilizing this resource, or even if it
18 is too soon to tell.
- 19 • Two consecutive projects on pages 45 and 46 of the Smart Grid Report—the
20 Customer Relationship Management and Integrated Demand Response Resource

⁹ UM 1675 – Idaho Power 2015 Smart Grid Report, pp. 53&54.

¹⁰ UM 1675 – Idaho Power 2015 Smart Grid Report, Appendix D, p. 12.

¹¹ UM 1675 – Idaho Power 2015 Smart Grid Report, p. 9.

¹² UM 1675 – Idaho Power 2015 Smart Grid Report, Appendix D, p. 2.

1 Control—are not updated from the 2014 report. CUB recognizes that the
2 Company may still be researching areas of development with these projects, but
3 this was among several parts of the report in which CUB felt that Idaho Power did
4 not provide more relevant content. For example, CUB appreciated the format in
5 which Idaho Power composed its update on the outage management system.¹³
6 Though that update was brief, the Company provided enough information about
7 the delay in the project to give stakeholders an idea of where the Company is
8 currently at. The Company explains that the project was suspended because it
9 needed to shift around resources for a period of time. The project recommenced in
10 2014 and the Company is currently selecting and contracting a vendor. CUB
11 appreciated the account and recommends the same for all the projects listed
12 throughout the Smart Grid Report.

13 In addition to these, there are other issues CUB identified in the Smart Grid
14 Report in which the Company could have expounded more clearly—the Available
15 Transfer Capability tool, the dynamic line rating (DLR) project, and the renewable
16 integration tool (RIT). However, CUB later noticed that Staff had addressed these
17 projects in its comments to the Smart Grid Draft Report, and the Company responded to
18 Staff’s comments with the clarity CUB was looking for.¹⁴

19 The ATC tool is a mechanism that appears to analyze available transfer capability
20 when incorporating stochastic variation of wind generation and load. The Company does
21 not provide much more information on this project than it did last year, and as Staff also
22 noted, the Company says it is still working with North Carolina State University, but it

¹³ UM 1675 – Idaho Power 2015 Smart Grid Report, p. 42.

¹⁴ UM 1675 – Idaho Power 2015 Smart Grid Report, Appendix A.

1 does not state much more than this. The Company does add that it is planning on
2 “includ[ing] solar resources in the calculations,” which CUB finds to be interesting, but
3 there is no additional information about what even this means.¹⁵ CUB would appreciate
4 more specificity with interesting projects like this, but CUB reiterates that the Company
5 responded to Staff with additional details that will suffice until next year’s report.

6 There could also have been more substantive updates on the Company’s DLR and
7 RIT projects. In last year’s comments, CUB remarked that it was interested in knowing
8 more about the RIT. Staff also pointed out its concerns with the RIT and DLR projects in
9 its Smart Grid Draft Report comments. CUB found the Company’s response to Staff on
10 these two projects, in particular the RIT update, to be informative. CUB believes that the
11 Company adequately addressed CUB’s concerns about the status of those projects when
12 it responded to Staff’s comments in Appendix A.

13 CUB appreciates that the Company included Staff’s comments in the final draft of
14 the Smart Grid Report.

15 **Conclusion**

16 Despite some of the areas CUB felt lacked clarity in the report, CUB is overall
17 pleased with the results of Idaho Power’s 2015 Smart Grid Report. Like last year, the
18 Company has made serious efforts in its smart grid projects and the assessment of those
19 projects, and CUB appreciates the extent of the updates the Company delivers. CUB
20 commends the Company in its work.

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¹⁵ UM 1675 – Idaho Power 2015 Smart Grid Report, pp. 9&10.

Sincerely,

A handwritten signature in black ink, appearing to be 'Nadine', written over a horizontal line.

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