

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

In the Matter of)
)
IDAHO POWER COMPANY,)
)
2013 Annual Smart Grid Report)
)
_____)

COMMENTS OF THE
CITIZENS' UTILITY BOARD OF OREGON

November 6, 2013



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IDAHO POWER COMPANY,) COMMENTS OF
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2013 Annual Smart Grid Report) OF OREGON
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CUB appreciates the opportunity to comment on the Idaho Power 2013 Annual Smart Grid Report. CUB is generally pleased with Idaho Power's (the Company's) work.

The report contains many indications that the Company has taken serious efforts in its smart grid projects and assessments, and it highlights a wide variety of updates. In particular, CUB is pleased to see that the Company has monitored its transmission substations for susceptibility to geomagnetic induced currents (p.11). This indicates that the Company is taking necessary steps to address grid resiliency. CUB also commends the Company in its attempts to shift the way it predicts wind speed and direction (p.10). In addition, CUB appreciates the updates on AMI benefits and how Idaho Power intends on proceeding with conservative voltage reduction (CVR) with caution before extending CVR to other territories (p.12). The Company provides a descriptive update on its current AMI program, how it has been used, and Idaho Power's steps going forward.

The Smart Grid Report also includes a detailed and informative, yet preliminary, update on its time-of-use program (Appendix D-6), and shows no indication of a mandatory time-of-use pricing program. Appendix D-6 of the report implies that voluntary time-of-use programs have shown a statistically significant reduced load during peak times in certain months. While this might indicate that time-of-use pricing programs are primarily effective during peak load hours, the Company's results can now inform stakeholders of this fact.

Overall, CUB appreciates that a large portion of Idaho Power's report is non-confidential. This allows other utilities to take advantage of the Company's ability to break new grounds. The report is comprehensive and a good summary of which efforts have succeeded and which ones can improve.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nadine', with a long horizontal stroke extending to the right.

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UM 1675 – CERTIFICATE OF SERVICE

I hereby certify that, on this 6th day of November, 2013, I served the foregoing **COMMENTS OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket UM 1675 upon each party listed in the UM 1675 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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Respectfully submitted,

A handwritten signature in black ink that reads "Sommer Templet". The signature is written in a cursive, flowing style.

Sommer Templet, OSB #105260

Staff Attorney

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