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November 21, 2017

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97301

RE: Tariff Advice No. 17-11
Modifications to Schedule 71 – Educational Distributions

Attention Filing Center:

Pursuant to ORS 757.205, Idaho Power Company (“Idaho Power” or Company”) herewith transmits for filing First Revised Sheet Nos. 71-1 and 71-2 requesting an effective date of January 18, 2018. The purpose of this filing is to obtain approval of the addition of a Give-Away Opportunity to Schedule 71, Educational Distributions (“Schedule 71”). The proposed modification seeks to add a Commercial Energy Efficiency Kit (“Commercial Kit”) give-away opportunity for small and medium size commercial customers of Idaho Power.

Background

In February 2016, Idaho Power filed Advice No. 16-03 with the Public Utility Commission of Oregon (“Commission”) requesting approval to implement Schedule 71 with the intent of using low- and no-cost channels to deliver energy efficiency items with energy savings directly to customers. The goal for these distributions is to drive behavior change and create awareness of and demand for energy efficiency programs in Idaho Power’s service territory. The existing offerings in Schedule 71 consist of student energy efficiency kits and give-away opportunities, including LED lightbulbs, residential energy efficiency kits (“Residential Kit”), and other distributions that provide measurable savings. The Commission approved the implementation of Schedule 71 in the Company’s Oregon service area effective March 9, 2016. More information about the program can be found at <https://www.idahopower.com/ways-to-save/savings-for-your-home/rebates-and-offers/energy-saving-kits/>.

Items selected for distribution under Schedule 71 have an initial cost-effectiveness analysis that indicates the installed measure is either currently cost-effective or is expected to be cost-effective in the near future. Typically, selected items have additional benefits beyond traditional energy savings, such as educating customers about energy efficiency, expediting the opportunity for customers to experience newer technology, or allowing the Company to gather data or validate potential energy savings resulting from behavior changes. Idaho Power has experienced significant

growth in participation in the program from 2015, when the offering first became available in the Company's Idaho service area, to date. In Idaho Power's Oregon service area, which includes approximately 18,900 customers, the Company provided an estimated 1,314 total kits or lightbulbs in 2016 and has provided an estimated 1,964 kits or lightbulbs as of October 31, 2017. To continue offering a cost-effective program of interest to customers, Idaho Power is proposing to add an energy-savings kit give-away opportunity for the Company's small and medium size commercial customers.

Commercial Energy Efficiency Kit

Similar to the Residential Kit, Idaho Power is proposing to offer a Commercial Kit to business owners in the Company's Oregon service area. A customer is eligible to receive one energy-savings kit per business for the life of the program. The kit may include any combination of LED bulbs, faucet aerators, and/or a load sensing power strip. Other Commercial Kit items may be included depending on the customer's type of business.

Idaho Power may perform targeted demographic marketing to inform the Company's general service customers of the new give-away offering. The Company is targeting a January 18, 2018, offering to customers in both the Oregon and Idaho jurisdictions. Idaho Power is currently in the process of contracting with a vendor who will assist the Company with the delivery of the Commercial Kit to customers. Because savings estimates and installation rate assumptions are unknown, Idaho Power has performed a sensitivity analysis to determine the maximum cost of a basic Commercial Kit for a small commercial office. In this analysis, it was assumed that the Commercial Kit would contain two LED bulbs, two bathroom faucet aerators, one kitchen faucet aerator, and a load sensing power strip. The following summarizes the assumptions used and cost-effectiveness ratios:

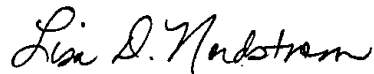
- Measure Life (Average): 8 years
- Incremental Participant Cost: \$0
- Incentive: \$0
- Maximum Kit Cost: \$72.39
- Average Savings: 180.76 kilowatt-hours/year
- Cost-Effectiveness Ratios
 - Utility Cost Test ("UCT") = 1.00
 - Total Resource Cost Test ("TRC") = 1.10

Idaho Power believes the assumptions used in the sensitivity analysis are conservative. The Company performed a similar analysis when implementing Schedule 71, estimating a UCT of 1.00 and a TRC of 1.65 for the Residential Kits. The analysis proved to be conservative as the 2016 UCT and TRC cost-effectiveness ratios for the Residential Kits were 3.96 and 6.56, respectively. Schedule 71 as a whole continues to provide an extremely cost-effective program offering with a UCT of 3.63 and a TRC of 6.33 in 2016. As a recipient of a Commercial Kit, Idaho Power may request participants to submit a follow-up survey. The survey is intended to answer questions about the give-away offering and installation rates. Survey responses may show greater annual savings than Idaho Power's original assumptions.

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In addition to a Commercial Kit give-away, Idaho Power is proposing a housekeeping change to the description of the Residential Kit because the give-away items may vary based on the appliances within a customer's home. The Company respectfully requests that the proposed modifications to Schedule 71 become effective on January 18, 2018. If you have any questions regarding this filing, please contact Senior Regulatory Analyst, Courtney Waites, at (208) 388-5612 or cwaites@idahopower.com.

Sincerely,



Lisa D. Nordstrom
Lead Counsel

LDN/kkt
Enclosure

SCHEDULE 71
EDUCATIONAL DISTRIBUTIONS

This schedule describes the direct energy savings opportunities with a focus on energy efficiency education activities offered by the Company. These program options are funded by the Energy Efficiency Rider.

STUDENT ENERGY EFFICIENCY KIT PROGRAM

AVAILABILITY

The Student Energy Efficiency Kit (SEEK) program is delivered to students through teacher participants in the Company's service area within the State of Oregon. This optional program is intended for fourth to sixth grade students. Teachers apply to Idaho Power to participate for a specific school semester. Participation is available on a first-come, first-serve basis. During the first year a school participates, all three grade levels are eligible. In subsequent years, participation will be limited to the youngest grade level that participated the previous year. This minimizes the risk of a single student participating more than one time.

PROGRAM DESCRIPTION

The SEEK program provides grade school students with quality, age-appropriate instruction regarding the wise use of electricity. Each participating student receives a kit that includes specific energy savings devices and educational items. Students install the devices in their homes and learn about energy use through provided measuring devices and educational materials. Teachers receive supporting curriculum and activities for classroom use and are asked to submit program reporting paperwork in a timely manner.

SERVICES PROVIDED

Once a class is enrolled in the program, teachers receive curriculum and supporting materials. Students receive classroom study materials, a workbook, and a take-home kit containing three light emitting diode (LED) bulbs, a high-efficiency showerhead, an LED nightlight, a furnace filter alarm (whistle), a digital thermometer for measuring water, refrigerator, and freezer temperatures, a water-flow rate test bag, and shower timer. All materials and kits are free to teachers and students.

GIVE-AWAY OPPORTUNITIES

AVAILABILITY

Energy saving measures are given to Idaho Power customers by direct mail, in person, or by an Idaho Power employee or approved contractor. Measures are chosen for use in customers' homes and residential dwellings or businesses.

(N)
(N)

PROGRAM DESCRIPTION

Idaho Power distributes specific measures either by direct mail, at events such as home and garden shows, county fairs, and community presentations, free of charge. These measures may be distributed to customers by Idaho Power field representatives or through Community Action Partnership agencies. The target audience is residential or small to medium commercial customers of Idaho Power. Educational material is to be provided at the same time.

(C)
(C)

SCHEDULE 71
EDUCATIONAL DISTRIBUTIONS
(Continued)

SERVICES PROVIDED

Energy savings measures include:

- LED bulbs that fit standard A-lamp sockets, typically 800 lumen and from 2700K - 3000K.
- Residential Energy Efficiency Kits which may include, but are not limited to, one or more of the following measures; LED bulb(s), 2.0 gpm or lower showerhead(s), faucet aerator(s), and/or load sensing power strip. (N)
- Commercial Energy Efficiency Kits which may include, but are not limited to, one or more of the following measures; LED bulb(s), faucet aerator(s), and/or load sensing power strip. (N)
(N)
- In addition, the Company may choose to distribute “other” energy-saving items directly to customers, free of charge. These “other” items may have additional benefits beyond traditional energy savings such as: educating customers about energy efficiency, expediting the opportunity for customers to experience newer technology, and allowing the Company to gather data or validate potential energy savings resulting from behavior change. To qualify as an “other” educational distribution, the initial cost-effectiveness analysis must indicate the item is either currently cost-effective or is expected to be cost-effective in the near future. The energy savings associated with these measures may have a relatively high behavioral component or provide an opportunity to further energy efficiency education of customers.