

LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

September 30, 2022

VIA ELECTRONIC FILING

PUC.FilingCenter@state.or.us

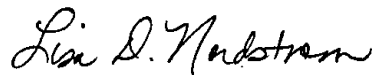
Re: Docket UM 1974(4)
In the Matter of Idaho Power Company's Application for Deferred
Accounting of Demand-Side Management Revenues and Expenditures

Attention Filing Center:

Enclosed for electronic filing, pursuant to Order No. 20-088, is Idaho Power Company's Application for Reauthorization of Deferred Accounting. The Notice of Application for Reauthorization of Deferred Accounting of Demand-Side Management Revenues and Expenditures is attached to the Application as Attachment A. Attachment B to the Application is CONFIDENTIAL and will be provided to the Public Utility Commission of Oregon's Filing Center under a separate encrypted email. The Application and Notice have been served on the parties in Docket Nos. UM 1974 and UE 233, Idaho Power Company's last general rate case.

If you have any questions, please do not hesitate to contact me or Regulatory Consultant Courtney Waites at (208) 388-5612.

Very truly yours,



Lisa D. Nordstrom

LDN:sg
Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1974(4)

In the Matter of Idaho Power Company's
Application for Deferred Accounting of
Demand-Side Management Revenues and
Expenditures

**APPLICATION FOR
REAUTHORIZATION**

I. INTRODUCTION

Pursuant to ORS 757.259(2)(d) and OAR 860-027-0300, Idaho Power Company ("Idaho Power" or "Company") hereby requests an accounting order reauthorizing Idaho Power to defer revenues collected through the Company's Tariff Schedule 91 - Energy Efficiency Rider ("EE Rider") and expenditures associated with the analysis and implementation of energy conservation and demand response programs. Idaho Power seeks reauthorization of this deferral effective as of October 1, 2022. In support of this Application, Idaho Power states:

1. Idaho Power is a public utility in the state of Oregon and its rates, services, and accounting practices are subject to the regulation of the Public Utility Commission of Oregon ("Commission").
2. This Application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize the deferral of certain items for later inclusion in rates.
3. Communications regarding this Application should be addressed to:

Lisa D. Nordstrom
Idaho Power Company
P.O. Box 70
Boise, ID 83707
lnordstrom@idahopower.com

Regulatory Dockets
Idaho Power Company
P.O. Box 70
Boise, ID 83707
dockets@idahopower.com

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II. OAR 860-027-0300(3) REQUIREMENTS

A. Description

With this deferral application, Idaho Power seeks reauthorization from the Commission to defer, for future true-up, EE Rider revenues, and Demand-Side Management (“DSM”) activity expenditures. The EE Rider is a balancing account mechanism that charges customers a percentage of the sum of the monthly charges for the base rate components of their electric bill. Base rate components include the service charge, energy charges, demand charges, and the basic charge. Revenues received from the EE Rider fund the Company’s DSM activities and are recorded in a regulatory liability account. As funds are used for DSM activities, the balancing account is debited for the amount of the expenditure disbursement. The intent of the balancing account mechanism is to keep the balance in this account as close to zero as possible.¹ The Commission approved the establishment of Idaho Power’s EE Rider effective August 31, 2005² and approved the Company’s request to defer demand-side management revenues and expenses with Order No. 18-457. In addition, the Company requests that deferred amounts are exempt from the deferral earnings test because the Company’s DSM activities are cost-effective conservation resources under ORS 757.262, and therefore, not subject to ORS 757.259(5).³ This treatment is also consistent with the Commission approval of the EE Rider with Advice No. 05-03.

¹ Advice No. 05-03.

² In accordance with the decision of the Commission in the Public Meeting of August 30, 2005, and per the letter dated August 30, 2005, from the Commission Administrator.

³ See ORS 757.259(2)(d), (4); see also *In the Matter of Avista Corporation, dba Avista Utilities, Application for the Reauthorization of Certain Deferral Accounts Related to Avista’s Demand Side Management Programs*, Docket No. UM 1165(11), Order No. 16-304, App. A at 4 (Aug. 16, 2016) (“Historically, the Commission has not declined to authorize amortization of prudently-incurred DSM expense associated with Commission approved programs based on the earnings review required under ORS 757.259(5)”).

1 **B. Reasons for Deferral**

2 Energy efficiency and demand response provide economic and operational benefits to
3 the Company and its customers and support the wise use of energy by Idaho Power
4 customers. Idaho Power strives to provide conscientious, prudent, and reasonable actions
5 and activities that result in cost-effective energy efficiency and considers this cost-effective
6 energy efficiency the Company’s least-cost resource.⁴ The Company pays particular
7 attention to ensuring its activities provide the best value to Idaho Power’s customers.

8 On July 6, 2005, Idaho Power filed a request with the Commission for authorization to
9 implement a new charge that would fund DSM activities in the Company’s Oregon service
10 area, the EE Rider. DSM refers to the two kinds of energy-efficiency activities: things
11 customers do to reduce overall electricity use (like using more efficient light bulbs) and
12 programs that shift use from periods of extreme demand or demand response programs.

13 As described in its annual DSM report filing in Docket No. UM 1710, the Company
14 provides information and programs to ensure customers have opportunities to learn about
15 their energy use, how to use energy wisely, and participate in programs. Idaho Power’s
16 current energy efficiency offerings include programs in residential and commercial new
17 construction, residential and commercial retrofit applications, and irrigation and industrial
18 system improvement or replacement. The Company’s custom incentives offer a wide range
19 of opportunities to its irrigation, industrial, large-commercial, governmental, and school
20 customers to execute energy savings projects. In addition, Idaho Power offers demand
21 response programs with the goal of avoiding or delaying the need for new resources.

22 For more than a decade, Idaho Power has been funding the pursuit of cost-effective
23 energy efficiency through the EE Rider balancing account mechanism with the goal of using
24 customers’ funds wisely by providing conscientious, prudent, and responsible action and
25

26 ⁴ Idaho Power’s 2021 Integrated Resource Plan at 9.

1 activities. All energy efficiency and demand response offerings to Oregon customers are
2 managed in accordance with various Idaho Power tariff schedules authorized by the
3 Commission prior to commencement of any such offering. Any changes to a program offering
4 or measure are approved by the Commission as well.⁵ Annually, the Company prepares a
5 report summarizing the efforts, energy savings, and DSM expenditures for the prior year, and
6 beginning in 2016, files it with the Commission in Docket No. UM 1710. Finally, pursuant to
7 Order No. 94-590 issued in UM 551, Idaho Power notifies the Commission of any DSM
8 program measures that are not cost-effective and requests a cost-effectiveness exception
9 when applicable.⁶ Continued Commission approval of the ongoing operation of the EE Rider
10 balancing account, and deferral authorization, is critical to Idaho Power's pursuit of cost-
11 effective energy efficiency.

12 **C. Proposed Accounting**

13 Idaho Power records revenues and expenses that would be subject to the deferral
14 order in accordance with the Code of Federal Regulations to the Federal Energy Regulatory
15 Commission Account 254 (Regulatory Liability).

16 **D. Estimate of Amounts**

17 As of August 31, 2022, the Oregon jurisdictional EE Rider balance was approximately
18 positive \$103,000, meaning the Company has an additional \$103,000 of customer funds to
19 spend on the pursuit of cost-effective energy efficiency. The Company estimates net
20 amounts deferred beginning the date of this Application through August 2023 to be
21 approximately \$10,000, for a total balance of approximately positive \$113,000.

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24 ⁵ For example, Idaho Power's Advice No. 21-03, approved in the June 1, 2021, public meeting,
25 authorized changes to over 90 measures in DSM programs offered through Schedule 89 - Commercial
26 and Industrial Energy Efficiency ("Schedule 89").

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26 ⁶ Also, as a part of Idaho Power's request in Docket UM 1710(5), approved on March 24, 2022,
Idaho Power requested a cost-effectiveness exception for three program measures.

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CERTIFICATE OF SERVICE

UM 1974(4)

I hereby certify that on September 30, 2022, I served a true and correct copy of Idaho Power Company’s Application for Reauthorization by e-mail to said person(s) as indicated below.

OPUC Dockets
Citizens’ Utility Board of Oregon
dockets@oregoncub.org

Robert Jenks
Citizens’ Utility Board of Oregon
bob@oregoncub.org

Lisa F. Rackner
McDowell Rackner & Gibson PC
dockets@mrg-law.com

Stephanie S. Andrus
Department of Justice
Business Activities Section
stephanie.andrus@state.or.us

Mitch Moore
Kathy Zarate
Public Utility Commission of Oregon
mitch.moore@puc.oregon.gov
Kathy.zarate@puc.oregon.gov

Sommer Moser
Department of Justice
somer.moser@doj.state.or.us

Erik Colville
Public Utility Commission of Oregon
erik.colville@puc.oregon.gov

Gregory M. Adams
Richardson Adams, PLLC
greg@richardsonadams.com

Peter J. Richardson
Richardson Adams, PLLC
peter@richardsonadams.com

Joshua D. Johnson
Attorney at Law
jdj@racinelaw.net

Dr. Don Reading
dreading@mindspring.com

Anthony J. Yankel
Utility Net, Inc.
tony@yankel.net

Randy Dahlgren
Portland General Electric Company
pge.opuc.filings@pqn.com

Renewable Northwest Project
dockets@renewablenw.org

Irion A. Sanger
Sanger Law PC
irion@sanger-law.com

Wendy Gerlitz
NW Energy Coalition
wendy@nwenergy.org

Etta Lockey
Pacific Power
etta.lockey@pacificorp.com

Sarah Link
Pacific Power
sarah.link@pacificorp.com

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Oregon Dockets
PacifiCorp, d/b/a Pacific Power
oregondockets@pacificorp.com

Donald W. Schoenbeck
Regulatory & Cogeneration Services, Inc.
dws@r-c-s-inc.com

John W. Stephens
Esler Stephens & Buckley
stephens@eslerstephens.com

DATED: September 30, 2022.



Stacy Gust, Regulatory Administrative Assistant

Attachment A

BEFORE THE PUBLIC UTILITY COMMISSION

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OF OREGON

UM 1974(4)

In the Matter of Idaho Power Company's
Application for Deferred Accounting of
Demand-Side Management Revenues and
Expenditures

**NOTICE OF APPLICATION FOR
DEFERRED ACCOUNTING OF
DEMAND-SIDE MANAGEMENT
REVENUES AND EXPENDITURES**

On September 30, 2022, Idaho Power Company ("Idaho Power") filed an application with the Public Utility Commission of Oregon ("Commission") for an order reauthorizing deferral of revenues collected through the Company's Tariff Schedule 91 - Energy Efficiency Rider and expenditures associated with the analysis and implementation of energy conservation and demand response programs.

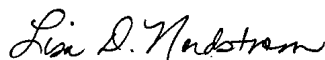
Approval of Idaho Power's Application will not authorize a change in Idaho Power's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

Idaho Power's Application will be posted on the Commission website for persons who wish to obtain a copy or they may contact the following:

Lisa D. Nordstrom
Idaho Power Company
1221 West Idaho Street
P.O. Box 70
Boise, ID 83707
lnordstrom@idahopower.com

Any person who wishes to submit written comments to the Commission on Idaho Power's Application must do so by no later than October 28, 2022.

DATED: September 30, 2022.



Lisa D. Nordstrom
Attorney for Idaho Power Company