



LISA D. NORDSTROM  
Lead Counsel  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

October 1, 2019

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Filing Center  
201 High Street SE, Suite 100  
Salem, Oregon 97301

Re: Docket UM 1974(1)  
In the Matter of Idaho Power Company's Application for Deferred  
Accounting of Demand-Side Management Revenues and Expenditures

Attention Filing Center:

Enclosed for filing in Docket No. UM 1974(1) is an electronic copy of 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 on a confidential CD. The Application and Notice have been served on the parties in Docket No. 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 Analyst Courtney Waites at (208) 388-5612.

Very truly yours,

A handwritten signature in black ink that reads "Lisa D. Nordstrom".

Lisa D. Nordstrom  
OSB No. 97352

LDN/kkt

Enclosures

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1974(1)

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

**APPLICATION**

**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, 2019. 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](mailto:lnordstrom@idahopower.com)

Regulatory Dockets  
Idaho Power Company  
P.O. Box 70  
Boise, ID 83707  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

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

2 **A. Description**

3 With this deferral application, Idaho Power seeks reauthorization from the Commission  
4 to defer, for future true-up, EE Rider revenues, and Demand-Side Management ("DSM")  
5 activity expenditures. The EE Rider is a balancing account mechanism that charges  
6 customers a percentage of the sum of the monthly charges for the base rate components of  
7 their electric bill. Base rate components include the service charge, energy charges, demand  
8 charges, and the basic charge. Revenues received from the EE Rider fund the Company's  
9 DSM activities and are recorded in a regulatory liability account. As funds are used for DSM  
10 activities, the balancing account is debited for the amount of the expenditure disbursement.  
11 The intent of the balancing account mechanism is to keep the balance in this account as  
12 close to zero as possible.<sup>1</sup> The Commission approved the establishment of Idaho Power's  
13 EE Rider effective August 31, 2005<sup>2</sup> and approved the Company's request to defer demand-  
14 side management revenues and expenses with Order No. 18-457. In addition, the Company  
15 requests that deferred amounts are exempt from the deferral earnings test because the  
16 Company's DSM activities are cost-effective conservation resources under ORS 757.262,  
17 and therefore, not subject to ORS 757.259(5).<sup>3</sup> This treatment is also consistent with the  
18 Commission approval of the EE Rider with Advice No. 05-03.

19  
20  
21 <sup>1</sup> Advice No. 05-03.

22 <sup>2</sup> 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.

23 <sup>3</sup> See ORS 757.259(2)(d), (4); see also *In the Matter of Avista Corporation, dba Avista Utilities,*  
24 *Application for the Reauthorization of Certain Deferral Accounts Related to Avista's Demand Side*  
25 *Management Programs*, Docket No. UM 1165(11), Order No. 16-304, App. A at 4 (Aug. 16, 2016)  
26 ("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.<sup>4</sup> 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 territory, 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 minimizing or delaying the need to build new supply-side  
22 peaking resources.

23           For more than a decade, Idaho Power has been funding the pursuit of cost-effective  
24 energy efficiency through the EE Rider balancing account mechanism with the goal of using  
25

---

26           <sup>4</sup> Idaho Power's 2017 Integrated Resource Plan at 1.

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

13 **C. Proposed Accounting**

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

17 **D. Estimate of Amounts**

18 As of August 31, 2019, the Oregon jurisdictional EE Rider balance was approximately  
19 negative \$1.38 million, meaning the Company has spent \$1.38 million more on the pursuit of  
20 cost-effective energy efficiency than customers have paid towards those efforts. The  
21 Company estimates net amounts deferred beginning the date of this Application through  
22 August 2020 to be approximately \$355,000, for a total balance of negative \$1.74 million.

23 \_\_\_\_\_  
24 <sup>5</sup> For example, Idaho Power's Advice No. 18-08, approved with Order No. 18-295, authorized  
25 changes to over 130 measures in DSM programs offered through Schedule 89 - Commercial and  
26 Industrial Energy Efficiency ("Schedule 89").

<sup>6</sup> Also, as a part of Idaho Power's Advice No. 18-08, Idaho Power requested a cost-  
effectiveness exception for thirteen measures of Schedule 89.



1 DATED: October 1, 2019

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

IDAHO POWER COMPANY

*Lisa D. Nordstrom*

---

LISA D. NORDSTROM  
Attorney for Idaho Power Company

## **Attachment A**



BEFORE THE PUBLIC UTILITY COMMISSION

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

OF OREGON  
**UM 1974(1)**

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 October 1, 2019, 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.

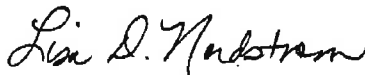
Approval of Idaho Power's Application will not authorize a change in Idaho Power's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

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](mailto: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 25, 2019.

DATED: October 1, 2019.



---

Lisa D. Nordstrom  
Attorney for Idaho Power Company

**Attachment B**

**CONFIDENTIAL**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**CERTIFICATE OF SERVICE**  
**UM 1974(1)**

I hereby certify that on October 1, 2019, I served a true and correct copy of Idaho Power Company's Application for Deferred Accounting of Demand-Side Management Revenues and Expenditures on the parties in Dockets UM 233, Idaho Power Company's last general rate case, and UM 1974 by e-mail to said person(s) as indicated below.

OPUC Dockets  
Citizens' Utility Board of Oregon  
[dockets@oregoncub.org](mailto:dockets@oregoncub.org)

Robert Jenks  
Citizens' Utility Board of Oregon  
[bob@oregoncub.org](mailto:bob@oregoncub.org)

Lisa F. Rackner  
McDowell Rackner & Gibson PC  
[dockets@mrg-law.com](mailto:dockets@mrg-law.com)

Stephanie S. Andrus  
Department of Justice  
Business Activities Section  
[stephanie.andrus@state.or.us](mailto:stephanie.andrus@state.or.us)

Mitch Moore  
Public Utility Commission of Oregon  
[mitch.moore@state.or.us](mailto:mitch.moore@state.or.us)

Somer Moser  
Department of Justice  
[somer.moser@doj.state.or.us](mailto:somer.moser@doj.state.or.us)

Erik Colville  
Public Utility Commission of Oregon  
[erik.colville@state.or.us](mailto:erik.colville@state.or.us)

Gregory M. Adams  
Richardson Adams, PLLC  
[greg@richardsonadams.com](mailto:greg@richardsonadams.com)

Peter J. Richardson  
Richardson Adams, PLLC  
[peter@richardsonadams.com](mailto:peter@richardsonadams.com)

Joshua D. Johnson  
Attorney at Law  
[jdi@racinelaw.net](mailto:jdi@racinelaw.net)

Dr. Don Reading  
[dreading@mindspring.com](mailto:dreading@mindspring.com)

Anthony J. Yankel  
Utility Net, Inc.  
[tony@yankel.net](mailto:tony@yankel.net)

Randy Dahlgren  
Portland General Electric Company  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Douglas C. Tingey  
Portland General Electric Company  
[doug.tingey@pgn.com](mailto:doug.tingey@pgn.com)

Irion A. Sanger  
Davison Van Cleve, PC  
[irion@sanger-law.com](mailto:irion@sanger-law.com)

Wendy Gerlitz  
NW Energy Coalition  
[wendy@nwenergy.org](mailto:wendy@nwenergy.org)

Etta Lockey  
Pacific Power  
[etta.lockey@pacificcorp.com](mailto:etta.lockey@pacificcorp.com)

Sarah Link  
Pacific Power  
[sarah.link@pacificcorp.com](mailto:sarah.link@pacificcorp.com)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Oregon Dockets  
PacifiCorp, d/b/a Pacific Power  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

John W. Stephens  
Esler Stephens & Buckley  
[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com)  
[ortez@eslerstephens.com](mailto:ortez@eslerstephens.com)

DATED: October 1, 2019.

Donald W. Schoenbeck  
Regulatory & Cogeneration Services, Inc.  
[dws@r-c-s-inc.com](mailto:dws@r-c-s-inc.com)

Renewable Northwest Project  
[dockets@renewablenw.org](mailto:dockets@renewablenw.org)

  
\_\_\_\_\_  
Kimberly Towell, Executive Assistant