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October 22, 2021

**ELECTRONICALLY FILED**

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

Re: Oregon Tariff Advice No. 21-09  
Schedule 75, Simple Steps Smart Savings Program

Attention Filing Center:

Pursuant to ORS 757.054 and ORS 757.205 and Order No. 94-590, Idaho Power Company ("Idaho Power" or "Company") hereby transmits for filing revisions to Schedule 75, Simple Steps Smart Savings Programs ("Simple Steps").

Seventh Revised Sheet No. 75-1  
Fourth Revised Sheet No. 75-2

Cancelling  
Cancelling

Sixth Revised Sheet 75-1  
Third Revised Sheet 75-2

**Simple Steps, Smart Savings Program**

The Simple Steps Program, initially established in 2010, was a regional point-of-sale buy-down program administered by the Bonneville Power Administration ("BPA"). It utilized a markdown model that provided incentives directly to the manufacturers or retailers, with savings passed on to the customer at the point of purchase. The original measure offerings in Oregon included CFL and LED bulbs, specialty bulbs, light fixtures, showerheads, and clothes washers. BPA sunset the Simple Steps Program on September 30, 2020, after determining the program would no longer be cost effective after the 2020 program year. The decrease in cost-effectiveness was due to the ongoing lighting market transformation towards high-efficiency lightbulbs, a decrease in deemed savings, and administrative costs from the contractor.

**New Lighting Buydown Program**

In 2020, Idaho Power began consulting with its Energy Efficiency Advisory Group ("EEAG") on the feasibility of implementing a cost-effective variation of the Simple Steps point-of-sale buy-down program. Idaho Power reached out to the Energy Trust of Oregon ("ETO") to learn more about their modified lighting buy-down program that specifically targets certain market channels where LEDs are a smaller share of the lighting sales such as mass merchandise, grocery, and dollar stores. As shown in the Northwest Energy Efficiency Alliance's 2019 Residential Lighting Market Analysis, these "retailers may present the greatest opportunity to

further increase LED market share.”<sup>1</sup> In the fall of 2020, Idaho Power requested a proposal from CLEARResult<sup>2</sup> to design a lighting buy-down offering similar to the ETO’s offering. After reviewing several proposals with CLEARResult, the Company determined the offering proposed in this filing would be cost-effective. The proposed program will target general purpose, reflector/recessed can, and specialty bulbs at mass merchandise, grocery, dollar, and small hardware stores. LED fixtures will be offered at all retail market channels as well as do-it-yourself and membership stores.

### **Proposed Changes to Schedule 75**

The Company is pleased to have identified a cost-effective replacement program for the lighting portion of the Simple Steps Program and is planning to roll out the modified program across its service area in December 2021. In this filing, the Company is requesting approval of several modifications to its existing Schedule 75, primarily:

1. Change the tariff schedule name to “Buydown Program” to remove reference to the BPA-administered Simple Steps Program and to generically reflect the updated program offering.
2. Remove the appliance and showerhead measures from the program. The Regional Technical Forum (“RTF”) workbook on claimed savings for showerheads was deactivated in mid-2020, and the appliance buy-down offering, as proposed by CLEARResult, is not cost-effective under the TRC.
3. Remove the compact fluorescent lighting (“CFL”) measures. Generally, manufacturers have transitioned from CFLs to LEDs. CFLs have also been removed from the RTF workbook.
4. Add language clarifying the lighting offerings are specific to LED light bulbs to provide clarity around the qualifying products.

### **Cost-effectiveness Exception Request**

Idaho Power is requesting approval for one cost-effectiveness exception as allowed by Order No. 94-590, issued in Docket No. UM 551 within the program. Globe LEDs in the 250 to 1049 lumen range have an expected TRC of 0.87. The globe LEDs are currently part of the ETO’s lighting buydown offering, and Idaho Power intends to include the measure in its Idaho service area as well.

While the cost-effectiveness analysis is based on CLEARResult’s forecast of LED sales for Idaho Power through December 2022, the cost-effectiveness of this measure, as well as the other measures within the buydown offering, is dependent on the number of bulbs and fixtures sold in the program. As more LEDs are purchased through the participating retail channels, CLEARResult’s fixed monthly contract fees are spread across more bulbs and fixtures. Thus, improving the measure’s cost-effectiveness. The removal of this measure from Oregon could negatively impact the cost-effectiveness of the other measures in the program as the fixed monthly fees will be spread across less bulbs and fixtures.

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<sup>1</sup> Northwest Energy Efficiency Alliance. 2019 Residential Lighting Market Analysis. Page 4.  
<https://neea.org/img/documents/2019-Residential-Lighting-Market-Analysis.pdf>

<sup>2</sup> CLEARResult was the third-party contractor that had provided administrative and marketing services to the Company for the Simple Steps Program.

	Measure	% of 2020 Oregon Program Savings*	UC Test Ratio	TRC Test Ratio	TRC Test Ratio (excluding admin exp.)
1	Retail LED Globe 250 to 1049 lumens.	2.58%	1.39	0.80	0.87

\*Based on Oregon lighting savings specific to the mass merchandise, grocery, dollar, and small hardware stores.

Idaho Power recommends this measure remain in the Buydown Program offering through December 2022. The inclusion of the measure will provide consistency in the program offering across the Company's service area, consistency with DSM programs in the region, and will help increase participation in a cost-effective program. Therefore, the Company believes the measure meets cost-effectiveness conditions C and D as outlined below:

- C. The measure is included for consistency with other DSM programs in the region;*
- D. Inclusion of the measure helps increase participation in a cost-effective program.*

### **Potential Future Offering**

While Idaho Power has found a cost-effective offering to replace the lighting portion of the Simple Steps Program, the Company is still in the process of exploring opportunities to replace the appliance measures the previous program provided.

The Company respectfully requests that the attached Schedule 75 become effective on December 1, 2021. If you have any questions regarding this tariff advice, please contact Regulatory Analyst Zack Thompson at (208) 388-2982 or [zthompson@idahopower.com](mailto:zthompson@idahopower.com).

Sincerely,



Connie Aschenbrenner

CA:sg

Enclosure

SCHEDULE 75  
BUYDOWN PROGRAM

(T)

This schedule describes the Buydown Program offered by the Company and funded by the Energy Efficiency Rider. (T)

LIGHTING INCENTIVES

GENERAL PURPOSE LED BULB OFFERING

(T)

AVAILABILITY

This program is available to customers purchasing designated, reduced-price ENERGY STAR® light bulbs from participating retailers. Bulbs can be purchased as available on a first-come, first-served basis.

SERVICE PROVIDED

Designated LED ENERGY STAR® general purpose light bulbs have varying wattages. The Company will pay contractor manufacturers' mark-down fees plus program administration costs. The bulbs will be distributed to participating retailers and sold at a reduced price. The contractor will be responsible for manufacturer negotiations, retailer relationships, product pricing, sales data tracking, and in-store marketing. The Company will augment in-store promotions and perform additional in-store visits, where possible. (N)

SPECIALTY LED BULB OFFERING

(N)

AVAILABILITY

This program is available to customers purchasing designated, reduced-price ENERGY STAR® light bulbs from participating retailers. Bulbs can be purchased as available on a first-come, first-served basis.

SERVICE PROVIDED

Designated LED ENERGY STAR® light bulbs have varying wattages and may include recessed cans, globes, and candelabras. The Company will pay contractor manufacturers' mark-down fees plus program administration costs. The bulbs will be distributed to participating retailers. The contractor will be responsible for manufacturer negotiations, retailer relationships, product pricing, sales data tracking, and in-store marketing. The Company will augment in-store promotions and perform additional in-store visits, where possible. (N) (D) (N)

LED LIGHT FIXTURE OFFERING

(N)

AVAILABILITY

This offering is available to customers purchasing designated, reduced-price ENERGY STAR® LED light fixtures from participating retailers. Fixtures can be purchased on a first-come, first-served basis. (D)

SERVICE PROVIDED

The ENERGY STAR® LED light fixtures have an LED diode built into the fixture itself. The Company will pay contractor manufacturers' mark-down fees plus program administration costs. The contractor will be responsible for manufacturer negotiations, retailer relationships, product pricing, sales data tracking, and in-store marketing. The Company will augment in-store promotions and perform additional in-store visits, where possible. (D) (D) (D)

SCHEDULE 75  
BUYDOWN PROGRAM  
(Continued)

(D)

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