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May 16, 2023

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. 23-04
Schedule 75, Buydown 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, Buydown Program ("Schedule 75").

Eighth Revised Sheet No. 75-1

Cancelling

Seventh Revised Sheet 75-1

SCHEDULE 75

The Buydown Program ("Program") is a targeted point-of-sale light-emoting diode ("LED") light bulb and fixture buy-down program. It follows a markdown model that provides incentives directly to manufacturers or retailers, with discounted prices passed on to the customer at the point of purchase. The program is available to customers purchasing designated, reduced-price ENERGY STAR light bulbs from participating retailers.

PROGRAM BACKGROUND

As a way to promote the continued adoption of designated LED ENERGY STAR® general purpose lightbulbs, Idaho Power implemented the Program after the Bonneville Power Administration sponsored buy-down program ended in September 2020. At that time, shelf studies showed that specific retail channels in the region were still selling inefficient lighting products. The Program as currently configured launched in late December 2021, providing LED ENERGY STAR® light bulb and light fixture incentives at grocery, dollar, mass merchandise, and small hardware stores. LED ENERGY STAR® fixture incentives are also available at membership club and do-it-yourself hardware stores. In 2022, Idaho Power's Oregon customers purchased 21,295 LED bulbs and fixtures and saved 99,736 kilowatt-hours ("kWh").

ENERGY INDEPENDENCE AND SECURITY ACT SAVINGS IMPACTS

The Energy Independence and Security Act (“EISA”) was signed into law in 2007 and set manufacturing standards for light bulbs. Originally, it required bulbs to be 60-70 percent more efficient by 2020 which included a 45 lumen-per-watt backstop requirement. In 2019, the Department of Energy (“DOE”) reviewed EISA and determined that it was not economically feasible for manufacturers to produce an incandescent lamp that met the 45 lumen per watt requirement and therefore, EISA could not go into effect. However, in January 2021, Executive Order 13990 instructed all agencies to review existing regulations issued or adopted between January 2017 and January 2021. In April 2022, the DOE issued a Final Rule that reinstated EISA and the 45 lumen per watt backstop effective July 2022. The DOE enacted a progressive enforcement policy with different ramp up times for both manufactures/importers and retailers/distributors. For the distribution and sale of non-compliant light bulbs, warnings would be issued from January 1 to February 28, 2023. Reduced penalties would be issued between March 1 to June 30, 2023, with full enforcement and penalties issued as of July 1, 2023.

The Regional Technical Forum (“RTF”) reviewed and updated the savings assumptions for residential lighting in September 2022. Per the Northwest Power and Conservation Council policy, the RTF modeled savings based on the current effective standards. With the exception of some compact fluorescent light bulbs, there are not many “minimally compliant” options available. Based on the market data, it was determined the baseline would be comprised almost entirely of LEDs. As a result, the RTF removed the retail and by-request delivery channels and effectively eliminated the savings for the retail buy-down offering.

REQUEST TO CLOSE SCHEDULE 75

Idaho Power has engaged in multiple discussions with the Energy Efficiency Advisory Group (“EEAG”) over the last several years as the future of lighting savings has been in flux. Specifically in August and November 2022, Idaho Power presented a proposal whereby it would continue the Program through June 30, 2023, to incentivize retailers who may have still been holding inefficient inventory. In this filing, the Company proposes to end the Program, effective July 1, 2023, coincident with full enforcement of penalties, as described above.

CONCLUSION

The Company respectfully requests that its proposed changes to Schedule 75 are approved on or before June 30, 2023, to align with the Program ending. If you have any questions regarding this tariff advice, please contact Regulatory Analyst Zack Thompson at (208) 388-2982 or zthompson@idahopower.com.

Sincerely,



Connie Aschenbrenner

SCHEDULE 75
BUYDOWN PROGRAM

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DISCONTINUED

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