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May 30, 2024

VIA E-MAIL TO

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: Docket No. UE 426 - In the Matter of Idaho Power Company, Request for a General Rate Revision.

Attention Filing Center:

Attached for filing in the above-referenced docket, please find the Joint Testimony in Support of the Second Partial Stipulation filed on behalf of Idaho Power Company, Staff of the Public Utility Commission of Oregon, the Oregon Citizens' Utility Board, and the Community Energy Project.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Cole Albee".

Cole Albee
Paralegal
McDowell Rackner Gibson PC

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 426

In the Matter of
IDAHO POWER COMPANY,
Application for a General Rate Revision

IDAHO POWER-STAFF-CUB-CEP

JOINT TESTIMONY IN SUPPORT OF SECOND PARTIAL STIPULATION

WITNESSES:

**CONNIE G. ASCHENBRENNER, IDAHO POWER
BRET FARRELL, OPUC STAFF
BOB JENKS, CUB
CHARITY FAIN, CEP**

May 30, 2024

1 **I. INTRODUCTION AND SUMMARY**

2 **Q. Who is sponsoring this testimony?**

3 A. This testimony is sponsored jointly by Idaho Power Company (“Idaho Power” or the
4 “Company”), Staff of the Public Utility Commission of Oregon (“Staff”), the Oregon
5 Citizens’ Utility Board (“CUB”), and the Community Energy Project (“CEP”) (collectively,
6 the “Stipulating Parties”).

7 **Q. Please provide your names, positions, and qualifications.**

8 A. My name is Connie G. Aschenbrenner, and my current position is Rate Design Senior
9 Manager in the Regulatory Affairs Department of Idaho Power. My qualifications are
10 provided in Idaho Power/1300, Aschenbrenner/1.

11 My name is Bret Farrell, and my current position is Senior Utility and Energy
12 Analyst for Staff. My qualifications are provided in Exhibit Staff/601.

13 My name is Bob Jenks, and my current position is Executive Director for CUB. My
14 qualifications are provided in Exhibit CUB/101 .

15 My name is Charity Fain, and my current position is Executive Director for CEP.
16 My qualifications are provided in Exhibits CEP/101 and CEP/102.

17 **Q. What is the purpose of this Joint Testimony?**

18 A. This Joint Testimony describes and supports the Second Partial Stipulation that was filed
19 in this docket on May 17, 2024. The Second Partial Stipulation addresses all issues
20 among the Stipulating Parties relating to the programmatic elements of Idaho Power’s Bill
21 Discount Program.

1 **Q. Please explain the position of J. R. Simplot Company (“Simplot”).**

2 A. Simplot is a party to the Second Partial Stipulation. However, in lieu of sponsoring the
3 Joint Testimony, Simplot separately filed a brief in support of the Second Partial
4 Stipulation.

5 **Q. Is the Second Partial Stipulation supported by all parties to docket UE 426?**

6 A. The Second Partial Stipulation is supported by all parties to docket UE 426 that had been
7 granted party status at the time the agreement was reached on May 6, 2024, which include
8 Idaho Power, Staff, CUB, CEP, and Simplot. The Oregon Irrigation Pumpers Association,
9 Inc. (“OIPA”) was granted party status on May 7, 2024, and was not part of the negotiations
10 resulting in the Second Partial Stipulation.

11 **Q. Has OIPA indicated whether it plans to object to the Second Partial Stipulation?**

12 A. OIPA has indicated that it does not plan to object to the Second Partial Stipulation.

13 **II. BACKGROUND**

14 **Q. Please summarize the background and context of docket UE 426.**

15 A. On December 15, 2023, Idaho Power filed a request for a general rate revision (“Initial
16 Filing”) with the Public Utility Commission of Oregon (“Commission”) to become effective
17 on October 15, 2024. The Company developed its case using a test year comprised of
18 the 12 months ending on December 31, 2024 (“2024 Test Year”). The Company’s test
19 year methodology began with actual 12-month financial results from 2022 adjusted to
20 include typical and traditional ratemaking adjustments consistent with a historical test year,
21 and then further adjusted to reflect the 2024 Test Year. Idaho Power requested to revise
22 customer rates to increase the Company’s annual Oregon-jurisdictional revenues by
23 approximately \$10.7 million, representing a 19.28 percent increase in revenues from the
24 current base rates. The Company’s Initial Filing included its proposed tariff Schedule 63,
25 which encompasses the Bill Discount Program.

1 CUB filed its notice of intervention on December 21, 2023, and Simplot filed its
2 petition to intervene on January 2, 2024. Staff is a party to this case as of right and is not
3 required to file a petition to intervene. Administrative Law Judge (“ALJ”) John Mellgren
4 convened a prehearing conference on January 9, 2024, which was attended by Staff,
5 CUB, Simplot, and CEP.¹ On January 12, 2024, ALJ Mellgren issued a memorandum
6 establishing a procedural schedule and granting Simplot’s request to intervene. CEP filed
7 its petition to intervene on February 28, 2024, and ALJ Mellgren granted CEP’s petition on
8 March 4, 2024. OIPA filed its petition to intervene on April 23, 2024, and a supplement to
9 its petition on April 26, 2024. Idaho Power filed its objection to OIPA’s petition on May 1,
10 2024. ALJ Mellgren granted OIPA’s petition with conditions on May 7, 2024.

11 **Q. Did Idaho Power provide notice of the proposed rate increase to its customers?**

12 A. Yes. On December 19 and 20, 2023, Idaho Power published notices in several
13 newspapers within its service area and between approximately January 8 and February 5,
14 2024, the Company issued bill inserts to all customers.

15 **Q. Did Idaho Power host a workshop to discuss its Initial Filing and answer Staff and
16 stakeholder questions?**

17 A. Yes. On February 13, 2024, the parties held a workshop to discuss the Company’s Initial
18 Filing.

19 **Q. How did the procedural schedule address issues related to energy justice and
20 procedural equity?**

21 A. On January 2, 2024, Idaho Power submitted a letter in UM 2211 providing an update to
22 stakeholders that Idaho Power filed its proposed Bill Discount Program as part of the
23 general rate case. On January 3, 2024, CEP, NW Energy Coalition, Verde, and CUB filed
24 comments expressing concern regarding the Company’s proposal to seek approval of the

¹ CEP was not a party when it attended the prehearing conference.

1 Bill Discount Program within UE 426 instead of UM 2211. On January 9, 2024, Staff filed
2 comments addressing the letters of concern. Staff proposed the following strategies to
3 promote further discussion among the parties: (1) a Commissioner workshop held in
4 advance of the first settlement conference on high-priority issues identified by Staff and
5 interested parties that impact environmental justice communities, such as Idaho Power's
6 income qualified bill discount proposal; (2) procedural intentionality regarding settlement
7 conferences to better reflect the resource disparities environmental justice advocate
8 organizations face in rate case settlement and maximize the reach of HB 2475 intervenor
9 funds; and (3) public participation and language accessibility to provide multiple
10 opportunities for meaningful public comment from the advocate community and individual
11 members of the public through written or verbal comments.

12 On February 16, 2024, the Administrative Hearings Division held a workshop to
13 provide training on rate case participation to stakeholders. On March 5, 2024, the
14 Commission held a Special Public Meeting Workshop on Environmental Justice Issues.
15 The workshop participants, including Idaho Power, Staff, CEP, CUB, Verde, and NW
16 Energy Coalition, engaged in constructive dialogue pertaining to a range of environmental
17 justice issues, particularly regarding the Bill Discount Program. The workshop involved
18 discussion of whether the Bill Discount Program should be addressed within the general
19 rate case or within UM 2211. The next day, Idaho Power circulated among the workshop
20 participants a proposed modified schedule with additional workshops and filings to
21 address the concerns raised regarding procedural equity and additional focused
22 consideration of the Bill Discount Program. One of these filings included a Bill Discount
23 Program Roadmap ("Roadmap"), which Idaho Power prepared to provide stakeholders
24 with readily accessible materials regarding the Bill Discount Program. The Roadmap
25 included background information on the proposed interim Bill Discount Program, a timeline
26 and summary of stakeholder engagement regarding the Bill Discount Program in

1 UM 2211, a summary of the Bill Discount Program proposal included in UE 426, and an
2 overview of the discovery related to the Bill Discount Program.

3 The Company held an additional related workshop on April 15, 2024, focusing on
4 priority topics for energy justice stakeholders. These workshops provided a platform for
5 stakeholders to voice their concerns regarding the energy justice components of the
6 general rate case, including the Bill Discount Program.

7 In addition to these two workshops, stakeholder comments have been submitted
8 in the docket from NW Energy Coalition, Verde, Baker County Parks, and Baker County
9 Commissioners, among other organizations. Further, public comment hearings were held
10 virtually on March 14, 2024, and in Ontario, Oregon on March 20, 2024.

11 **Q. Have the Stipulating Parties conducted discovery in this case?**

12 A. Yes. The Stipulating Parties actively engaged in formal discovery, which included 16 data
13 requests from CUB to Idaho Power and over 500 data requests from Staff to Idaho Power.
14 The Company also responded to other informal requests for information through email
15 and participated in ad hoc phone calls and video meetings with intervenors, as needed.

16 **Q. Did the Stipulating Parties file testimony and propose adjustments to Idaho Power's**
17 **Initial Filing?**

18 A. Yes, in part. Staff, CUB, and CEP filed opening testimony on March 25, 2024, in which
19 they proposed various modifications to Idaho Power's Bill Discount Program and
20 suggestions for improving environmental justice and equity concerns. Simplot did not file
21 testimony.

22 Staff's testimony included sixteen witnesses. Staff raised concerns pertaining to
23 procedural equity, level of relief, lack of an energy efficiency component, and the cost
24 recovery cap within the proposed Bill Discount Program.

1 CUB's testimony included two witnesses. CUB's testimony pertaining to the Bill
2 Discount Program addressed concerns regarding procedural equity, the cost recovery
3 cap, stakeholder involvement, post-enrollment verification, and arrearage management.

4 CEP's testimony included one witness. CEP addressed the Bill Discount Program
5 and raised concerns regarding procedural equity, level of relief, energy burden
6 calculations, post-enrollment verification, and arrearage management. CEP also urged
7 the consideration and adoption of stronger energy efficiency and weatherization programs.

8 **Q. Have the Stipulating Parties to this proceeding engaged in settlement discussions?**

9 A. Yes. On February 13, 2024, the Stipulating Parties convened to address cost of capital.
10 The Stipulating Parties participated in additional settlement conferences on April 5, 2024,
11 and April 18, 2024. As a result of the settlement discussions, the Stipulating Parties
12 reached a partial settlement encompassing all issues in the case aside from the
13 programmatic elements of the Bill Discount Program.² Thereafter, Idaho Power filed a
14 motion to suspend the procedural schedule, which was granted on April 24, 2024. The
15 Stipulating Parties convened on May 6, 2024, during which they resolved the final issues
16 relating to the Bill Discount Program. The Second Partial Stipulation memorializes the
17 Stipulating Parties' agreement.

18 **III. STANDARD OF REVIEW**

19 **Q. What is your understanding of the Commission's standard for reviewing**
20 **stipulations?**

21 A. When evaluating a stipulation, it is our understanding that the Commission will approve it
22 if it is supported by the evidence in the record and results in just and reasonable rates and

² The Stipulating Parties filed the First Partial Stipulation on May 16, 2024, and the supporting Joint Testimony on May 24, 2024.

1 is in accord with the public interest.³ In addition, Commission policy has been to
2 encourage voluntary resolution of issues “to the extent that settlement is in the public
3 interest.”⁴

4 **Q. Does the Commission need to approve specific methodologies or adjustments to
5 approve a stipulation?**

6 A. No. The Commission reviews settlements on a holistic basis to determine whether they
7 serve the public interest and result in just and reasonable rates.⁵ “When considering a
8 stipulation, [the Commission] need not evaluate each individual adjustment, theory, or
9 methodology proposed by the parties, but may review the reasonableness of the overall
10 rates, recognizing that a stipulation may represent a compromise of different positions.”⁶
11 The Second Partial Stipulation allows for the settlement of this case without agreement on
12 the methodology for issues raised by the Stipulating Parties. Approval of the Second
13 Partial Stipulation does not represent the Commission adopting any party’s methodology
14 for those adjustments.

15 **IV. PROGRAMMATIC ELEMENTS OF BILL DISCOUNT PROGRAM**

16 **Q. Does the Stipulation include a comprehensive overview of programmatic elements
17 of the Bill Discount Program?**

18 A. Yes. The Second Partial Stipulation uses the Company’s proposal in the Direct Testimony
19 of Connie Aschenbrenner as the starting point, and the terms in the Second Partial
20 Stipulation reflect modifications to the Company’s proposal. For ease of reference, a

³ See, e.g., *In the Matter of Pacific Power & Light Co. (dba PacifiCorp) Request for a General Rate Increase*, Docket No. UE 170, Order No. 05-1050 at 7 and 29 (Sept. 28, 2005); *In the Matter of Northwest Natural Gas Company, dba NW Natural, Request for a General Rate Revision*, Docket No. UG 435 et al., Order No. 22-388 at 6 (Oct. 24, 2022).

⁴ *In the Matter of PacifiCorp, dba Pacific Power, 2010 Transition Adjustment Mechanism*, Docket No. UE 207, Order No. 09-432 at 6 (Oct. 30, 2009).

⁵ Order No. 22-388 at 6.

⁶ *In the Matter of PacifiCorp, dba Pacific Power, 2012 Transition Adjustment Mechanism*, Docket No. UE 227, Order No. 11-435 at 3 (Nov. 4, 2011) (internal citations omitted).

1 comprehensive summary of the elements of the Bill Discount Program is included as
2 Attachment No. 1 to the Second Partial Stipulation.

3 **a) Top Discount Tier.**

4 **Q. Please explain the terms in the Second Partial Stipulation regarding the discount**
5 **tiers for the Bill Discount Program.**

6 A. In its Initial Filing, Idaho Power proposed the following discount tiers: (1) households
7 earning up to 60 percent of state median income (“SMI”) are entitled to a 10 percent
8 discount on the total monthly bill; (2) households earning up to 40 percent of SMI are
9 entitled to a 25 percent discount on the total monthly bill; and (3) households earning up
10 to 20 percent of SMI are entitled to a 60 percent discount on the total monthly bill.⁷
11 Additionally, eligibility for the Bill Discount Program required a household estimated annual
12 energy burden of greater than 6 percent for homes that are primarily electrically heated,
13 or greater than 3 percent for homes that are primarily heated using an alternative fuel
14 source.⁸ While Staff generally supported the tiered discount approach, Staff raised
15 concern regarding whether the level of relief provided in the original Bill Discount Program
16 is sufficient.⁹ CEP proposed that the Company offer greater discounts and consider
17 additional tiers or adjusted tier breakdowns.¹⁰ As a compromise, the Stipulating Parties
18 agree to increase the top discount tier from 60 to 70 percent.

⁷ Idaho Power/1303, Aschenbrenner/117.

⁸ Idaho Power/1303, Aschenbrenner/117.

⁹ Staff/600, Farrell/16.

¹⁰ CEP/100, Charity Fain/19.

1 **b) *Enrollment of Oregon Low Income Home Energy Assistance Program***
2 ***(“LIHEAP”) Recipients.***

3 **Q. Please explain the terms in the Second Partial Stipulation regarding the enrollment**
4 **policies for LIHEAP recipients.**

5 A. Following feedback from Community Action Partnership of Oregon, CUB, NW Energy
6 Coalition, Verde, and Rogue Climate, the Company revised its proposed Bill Discount
7 Program to exclude automatic enrollment of customers receiving bill assistance funds from
8 LIHEAP.¹¹ Staff recommended that Idaho Power automatically enroll customers receiving
9 LIHEAP funds into the Company’s Bill Discount Program.¹² The Stipulating Parties agree
10 that following the Company’s proposed Bill Discount Program’s effective date of October
11 15, 2024, Idaho Power will train Community Action Partnership (“CAP”) agencies that
12 administer LIHEAP to offer automatic enrollment in the Bill Discount Program to customers
13 who apply for LIHEAP and who are determined eligible for the Company’s Bill Discount
14 Program. Further, the Company will identify customers that received LIHEAP in the twelve
15 months prior to October 15, 2024, and will notify them of the Bill Discount Program’s
16 availability and eligibility criteria.

17 **c) *Energy Burden Calculation.***

18 **Q. Please explain the terms in the Second Partial Stipulation regarding energy burden**
19 **calculation.**

20 A. The discount tiers and energy burden requirement function to assist in targeting customers
21 in greatest need who have both low income and a high energy burden while balancing the
22 fact that there is a limited cost recovery base in Idaho Power’s Oregon service area.¹³
23 The program’s eligibility requirements and levels of assistance are informed by the Low

¹¹ Idaho Power/1300, Aschenbrenner/27.

¹² Staff/600, Farrell/14.

¹³ See Idaho Power’s Bill Discount Program Roadmap at 6; see *also id.*, Attach. 3.

1 Income Needs Assessment (“LINA”) completed in the summer of 2023.¹⁴ Idaho Power
2 proposed that eligibility for the Bill Discount Program require a household estimated
3 annual energy burden greater than 6 percent for homes that are primarily electrically
4 heated, or greater than 3 percent for homes that are primarily heated using an alternative
5 fuel source.¹⁵ To calculate energy burden, the Company proposed aggregating “each
6 requesting customer’s annual electric bill for their declared primary residence (based on
7 the location and/or customer’s most recent 12 months’ billings) and [comparing] such
8 amount against the household’s customer-provided gross income, occupancy, and
9 primary heating characteristics.”¹⁶ If applicable, in its proposal, the Company would have
10 first reduced the amount of the annual electric bill by LIHEAP prior to determining a
11 customer’s energy burden.

12 Staff raised concerns about calculating energy burden for customers who do not
13 have 12 months of previous billing.¹⁷ CEP recommended removing the 6 percent energy
14 burden component in calculating customer eligibility for the Bill Discount Program.¹⁸ The
15 Stipulating Parties agree that the Company will retain the energy burden calculation in
16 determining eligibility, but will not consider LIHEAP payments when determining a
17 customer’s energy burden.

18 **d) *Optional Participant Survey.***

19 **Q. Please explain the terms in the Second Partial Stipulation regarding participant**
20 **surveys.**

21 A. Idaho Power proposed conducting an initial voluntary post-enrollment survey within the
22 first 12 months following a customer’s enrollment in the Bill Discount Program.¹⁹ Staff

¹⁴ Idaho Power/1300, Aschenbrenner/26-27.

¹⁵ Idaho Power/1303, Aschenbrenner/117.

¹⁶ Idaho Power/1300, Aschenbrenner/25.

¹⁷ Staff/600, Farrell/15.

¹⁸ CEP/100, Charity Fain/19.

¹⁹ Idaho Power/1300, Aschenbrenner/29-30.

1 generally called on the Company to provide a more robust set of customer segment
2 analyses.²⁰ The Stipulating Parties agree that Idaho Power will provide customers
3 participating in the Bill Discount Program with a survey that will provide an option for
4 participants to provide demographic information. Prior to October 15, 2024, the Stipulating
5 Parties agree that Staff, Idaho Power, and other interested stakeholders will meet to
6 determine the demographic information that will be included in the optional survey and the
7 timing of when the survey will be sent post-enrollment. Upon request, Idaho Power will
8 make summarized information available to Commission Staff.

9 **e) Program Reporting and Metrics.**

10 **Q. Please explain the terms in the Second Partial Stipulation regarding program**
11 **reporting and metrics.**

12 A. Idaho Power proposed to report on a quarterly basis during the program's first year the
13 following monthly statistics: (1) count of new participants and total participants, by zip
14 code; (2) count of new participants and total participants, by discount tier; (3) participants'
15 average discount amount, by discount tier; (4) participants' average bill pre- and post-
16 discount, by discount tier; (5) average residential bill for non-participants; (6) count of
17 participants in arrears, by age and discount tier; (7) total arrears of participants, by age
18 and discount tier; (8) average arrears of participants, by age and discount tier; and (9)
19 percent of participants that have received energy assistance, by discount tier.²¹ Following
20 the first year of the Bill Discount Program, the Company proposed to adjust the content
21 and frequency of its reporting, unless directed to do so sooner.²² Staff "encourage[d] the
22 Company to remain committed to the reporting of energy burden related metrics."²³ The
23 Stipulating Parties agree that prior to October 15, 2024, Staff, Idaho Power, and other

²⁰ Staff/300, Scala/11.

²¹ Idaho Power/1300, Aschenbrenner/29.

²² Idaho Power/1300, Aschenbrenner/29.

²³ Staff/600, Farrell/19.

1 interested stakeholders will meet and determine the program-related data and metrics to
2 be reported quarterly by the Company.

3 **f) Arrearage Management.**

4 **Q. Please explain the terms in the Second Partial Stipulation regarding arrearage**
5 **management.**

6 A. Idaho Power did not propose an arrearage management component in connection with its
7 Bill Discount Program proposal. In its testimony, CUB emphasized the necessity of an
8 arrearage management/forgiveness program as part of the Company's Bill Discount
9 Program.²⁴ CEP recommended that Idaho Power consider adding an arrearage
10 management/forgiveness program in connection with the Bill Discount Program.²⁵ The
11 Stipulating Parties agree that prior to April 15, 2026, the Company will convene a
12 stakeholder group to discuss an arrearage management program.

13 **g) Monitoring and Reporting of High Usage Customers.**

14 **Q. Please explain the terms in the Second Partial Stipulation regarding monitoring and**
15 **reporting of high usage customers.**

16 A. CUB raised concerns over high usage customers and requested data identifying the set
17 of customers that had the highest 30 percent of usage during each month of the year.²⁶
18 Prior to October 15, 2024, the Stipulating Parties agree that Staff, Idaho Power, and other
19 interested stakeholders will meet and determine how "high-usage customers" will be
20 defined and will determine metrics that will be reported for high-usage customers. The
21 Company will file the high-usage customer metrics annually coincident with the report
22 outlined in Paragraph 16 to the First Partial Stipulation. The Company will coordinate with
23 organizations who are engaged in enrolling customers in the Bill Discount Program,

²⁴ CUB/100, Jenks/24.

²⁵ CEP/100, Charity Fain/21.

²⁶ CUB/100, Jenks/6.

1 including CAP agencies and other intervention agencies, operating in Idaho Power's
2 Oregon service area to explore the feasibility of implementing a process for referral of
3 high-usage customers to the CAP agencies for energy efficiency interventions. If
4 determined feasible by the above stakeholders, the Company commits to developing a
5 process for referral of high-usage energy customers. On April 15, 2025, coincident with
6 the report outlined in Paragraph 16 to the First Partial Stipulation, the Company will report
7 the findings of the feasibility determination.

8 ***h) Post-Enrollment Verification ("PEV").***

9 **Q. Please explain the terms in the Second Partial Stipulation regarding PEV.**

10 A. Idaho Power proposed randomly selecting 3 percent of participating customers as part of
11 its PEV policy.²⁷ The Company proposed to exclude customers receiving LIHEAP funds
12 within the past two years from PEV.²⁸ Staff encouraged Idaho Power "to continue to work
13 with Staff and stakeholders on the implementation of the post-enrollment verification
14 processes to ensure households are not being unduly burdened."²⁹ CUB raised concern
15 about PEV policies, particularly regarding "the harm to families being unnecessarily
16 removed from the program."³⁰ CUB requested that Idaho Power report evidence of
17 compelling cases of fraud, including data showing that the Company's PEV policy
18 effectively prevents fraud.³¹ CEP recommended removing the 3 percent PEV component
19 of the Bill Discount Program.³²

20 As a compromise, the Stipulating Parties agree that prior to October 15, 2024,
21 Staff, Idaho Power, and other interested stakeholders will meet and determine how PEV
22 will be conducted as part of the Company's Bill Discount Program. The Company will

²⁷ Idaho Power/1303, Aschenbrenner/118.

²⁸ Idaho Power/1303, Aschenbrenner/118.

²⁹ Staff/600, Farrell/22-23.

³⁰ CUB/100, Jenks/21.

³¹ CUB/100, Jenks/23-24.

³² CEP/100, Charity Fain/20.

1 remove language related to PEV from its proposed tariff Schedule 63. After the PEV
2 process has been considered through the public process, the Company will submit a tariff
3 advice filing to update Schedule 63.

4 ***j) Re-Enrollment Criteria.***

5 **Q. Please explain the terms in the Second Partial Stipulation regarding the**
6 **re-enrollment criteria.**

7 A. Idaho Power proposed a re-enrollment requirement occurring every two years.³³ CUB
8 proposed that the Company consider excluding LIHEAP households and households
9 receiving other state or federal public assistance, such as from the Supplemental Nutrition
10 Assistance Program (“SNAP”), from the re-enrollment requirement.³⁴ The Stipulating
11 Parties agree that customers will be enrolled in the Company’s Bill Discount Program for
12 no less than four years and that participating customers will not be removed from the
13 Company’s Bill Discount Program until the spring following such four-year time frame.
14 Prior to a customer’s removal from the Company’s Bill Discount Program, the Company
15 will proactively notify participants of the re-enrollment process via communication
16 channels determined by the Company’s targeted marketing approach informed by Staff,
17 parties, and other interested stakeholders.

18 ***j) Online Application.***

19 **Q. Please explain the terms in the Second Partial Stipulation regarding the online**
20 **application.**

21 A. Idaho Power originally proposed methods of enrolling in the Bill Discount Program by
22 calling the Company or requesting participation through a Community Action Partnership
23 Agency or participating Community-based Organization.³⁵ Staff encouraged

³³ Idaho Power/1303, Aschenbrenner/118.

³⁴ CUB/100, Jenks/22.

³⁵ Idaho Power/1303, Aschenbrenner/117.

1 implementing low-barrier enrollment practices, such as self-certification.³⁶ The Stipulating
2 Parties agree that Idaho Power will create an online application (available in both English
3 and Spanish) which will be available for customers prior to December 31, 2024. However,
4 if additional implementation time is necessary, the Stipulating Parties agree that prior to
5 November 15, 2024, the Company will provide notice and, if needed, meet to discuss why
6 additional implementation time is needed.

7 **V. SUPPORT FOR THE SECOND PARTIAL STIPULATION**

8 **Q. What is the basis for the Second Partial Stipulation?**

9 A. The Second Partial Stipulation is a compromise based on the record in this case, which
10 includes Idaho Power's Initial Filing and the Opening Testimony of Staff, CUB, and CEP.
11 During the settlement discussions, the Stipulating Parties resolved their differences
12 regarding the issues in the Second Partial Stipulation through dialogue, negotiations, and
13 compromise to reach a fair result.

14 **Q. What is your recommendation to the Commission regarding the Second Partial
15 Stipulation?**

16 A. The Stipulating Parties recommend and request that the Commission approve the Second
17 Partial Stipulation in its entirety and without modification.

18 **Q. Please explain why the Stipulating Parties believe that the Commission should
19 adopt the Second Partial Stipulation.**

20 A. The Stipulating Parties have carefully assessed Idaho Power's Initial Filing, reviewed
21 responses to data requests, and thoroughly analyzed the issues during multiple days of
22 settlement conferences. The Stipulating Parties believe that the agreements in this
23 Second Partial Stipulation provide a fair and reasonable resolution of the programmatic
24 elements of the Bill Discount Program.

³⁶ Staff/600, Farrell/14.

1 **Q. Please explain how the Stipulating Parties considered procedural equity in reaching**
2 **the agreements contained in the Second Partial Stipulation.**

3 A. Based on statements from certain stakeholders at the Commission's March 5, 2024,
4 Energy Justice Workshop and earlier letters from stakeholders concerned about
5 addressing the Bill Discount Program within the general rate case, the Stipulating Parties
6 recognized that there was a desire from certain non-parties to provide input that may
7 inform settlement discussions. As a result, the Stipulating Parties proposed to schedule
8 a subsequent Energy Justice workshop on April 15, 2024, and elected to hold additional
9 settlement conferences after the workshop. This timing and sequencing recognize that
10 certain entities may not have the resources to fully engage in a rate case proceeding but
11 may still wish to provide input that may inform settlement. The Stipulating Parties actively
12 proposed modifications in the procedural schedule to allow constructive dialogue from
13 stakeholders and interested parties. The dialogue from the workshops informed the
14 settlement conversations regarding the Bill Discount Program.

15 **Q. Please explain how the Second Partial Stipulation reflects the input provided at the**
16 **April 15, 2024, workshop.**

17 A. At the April 15, 2024, workshop, the parties discussed revenue requirement, return on
18 equity, residential rate design, weatherization, energy efficiency, consumer protections,
19 and the Bill Discount Program. In reaching the terms included in the Second Partial
20 Stipulation, the Stipulating Parties considered the input shared by Idaho Power, Staff,
21 CUB, CEP, and other non-party entities on these topics.

22 **a. Idaho Power**

23 **Q. Ms. Aschenbrenner, please explain why Idaho Power supports the Second Partial**
24 **Stipulation.**

25 A. Idaho Power appreciates the collaboration among stakeholders that has resulted in the
26 Second Partial Stipulation and the Company is committed to implementing processes and

1 solutions that will benefit its Oregon customers. The Company is appreciative of the time
2 and consideration from many stakeholders—parties to this case and beyond—that have
3 helped to influence the Company’s Bill Discount Program design in a manner that
4 considers the unique demographics of the Company’s Oregon service area and will target
5 funds to where they are most needed. Idaho Power and stakeholders engaged in a
6 comprehensive and robust dialogue surrounding the programmatic elements of the Bill
7 Discount Program and the Company believes the Stipulating Parties have reached a fair
8 and just outcome.

9 **Q. Will there be additional opportunities to further refine the Bill Discount Program in**
10 **the future?**

11 A. Yes, in fact many of those opportunities are outlined in the Second Partial Stipulation.
12 Idaho Power is looking forward to implementing the Bill Discount Program and gaining
13 experience as it operates the program. The Company will evaluate the success of the
14 program and areas for improvement through feedback received from agencies enrolling
15 customers, customers themselves, and the reporting described in the Second Partial
16 Stipulation. In the event there are aspects of the program that require refinement, the
17 Company expects that there will be an opportunity to do so following additional
18 engagement with stakeholders regarding program design.

19 **b. Staff**

20 **Q. Bret Farrell, please explain why Staff supports the Second Partial Stipulation.**

21 A. Staff supports the Second Partial Stipulation because it addresses the concerns with the
22 Bill Discount Program design outlined by Staff in Opening Testimony. Secondly, the
23 agreed upon design in the Second Partial Stipulation was the result of robust engagement
24 by stakeholder groups, Staff, and the Company. Staff believes that the engagement
25 across groups produced a thoughtfully designed program that will benefit customers. Staff
26 believes that the Bill Discount Program design agreed upon in this stipulation strikes a

1 balance between providing meaningful relief for energy burdened customers and
2 balancing the interests of all customers in Idaho Power's service territory.

3 **c. CUB**

4 **Q. Bob Jenks, please explain why CUB supports the Second Partial Stipulation.**

5 A. CUB recognizes the dedication of parties in this docket and appreciates the contributions
6 of those who participated in the EJ workshops to initiate Idaho Power's new Bill Discount
7 Program. Accordingly, CUB finds that the provisions of the Second Partial Stipulation
8 represent a reasonable compromise on the issues presented by parties that represent
9 diverse interests. CUB anticipates working with Idaho Power and stakeholders to ensure
10 that families in Idaho Power's Oregon service territory receive affordable and reliable
11 services, components CUB believes are integral to Idaho Power's developing Bill Discount
12 Program.

13 **d. CEP**

14 **Q. Charity Fain, please explain why CEP supports the Second Partial Stipulation.**

15 A. CEP appreciates the Company's efforts to allow for non-intervenor stakeholder
16 opportunities to participate in discussions to influence the design of the Bill Discount
17 Program. Although there are additional programmatic mechanisms that should be
18 considered to address energy burden and affordable services, this stipulation provides
19 further targeted opportunities to discuss, design and urge adoption of such. CEP finds the
20 Second Partial Stipulation is a reasonable compromise and supports the Second Partial
21 Stipulation.

22 **Q. Does this conclude your testimony?**

23 A. Yes.