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August 6, 2021

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

Re: Tariff Advice No. 21-08
Proposed modifications to Schedule 89, Commercial and Industrial Energy Efficiency

Attention Filing Center:

Pursuant to ORS 757.054 and 757.205, Idaho Power Company ("Idaho Power" or "Company") transmits for filing to the Public Utility Commission of Oregon ("Commission") the following proposed modifications to Schedule 89, Commercial and Industrial Energy Efficiency ("Schedule 89"):

Fourth Revised Sheet No. 89-4	Cancelling	Third Revised Sheet 89-4
Fourth Revised Sheet No. 89-9	Cancelling	Third Revised Sheet 89-9

In its filing, the Company is proposing to reduce incentive amounts related to three prescriptive Retrofits and three New Construction non-lighting measures. All proposed changes pass the Total Resource Cost ("TRC") cost-effectiveness test.

SCHEDULE 89

The Commercial and Industrial Energy Efficiency program ("C&I Program") is an incentive-based program designed to help reduce the costs of installing energy efficiency features in existing and new commercial and industrial buildings. The C&I Program provides incentives for a variety of prescriptive lighting and non-lighting measures, as well as a custom path for projects which fall outside the prescriptive offerings. During 2020, Idaho Power claimed 129,593,880 kilowatt-hours ("kWh") of annual savings for the program on a system-wide basis, and 4,029,715 kWh of annual savings in its Oregon jurisdiction specifically.

On April 9, 2021, Idaho Power filed Advice No. 21-03 where the Company proposed over 90 changes to the prescriptive Retrofits non-lighting measures and New Construction measures through measure additions, removals, or modifications. The changes were a result of updated cost-effectiveness analyses based on an updated Technical Reference Manual ("TRM"), updates to the Northwest Power and Conservation Council's Regional Technical Forum ("RTF"), and updates to Idaho Power's Demand-Side Management ("DSM") alternate costs. Due to volume of changes and to reflect time needed for additional collaboration between the Company and Oregon Commission Staff ("Staff"), a supplemental filing was submitted on May 11, 2021 to change the proposed effective date from June 1, 2021 to June 15, 2021. The Commission approved the proposed changes at the public meeting held on June 1, 2021.

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After the proposed changes went into effect on June 15, 2021, Idaho Power received a question from a contractor regarding the incentive amount for the automatic high-speed doors, under both the Retrofits and New Construction prescriptive offerings. Idaho Power conducted additional analysis of the measure calculations and reached out to the TRM contractor to further review the underlying assumptions used for the savings and cost values. After the evaluation, it was identified that the conversion from the "per door" to the "per square foot" unit of measurement between TRM versions 3.0 and 3.1 had incorrectly used a 25 square foot door as the baseline rather than an 80 square foot door, which is the most common size door in the program. This caused the measure savings and costs to be overvalued.

Idaho Power generally strives to design incentives that do not exceed measure costs, and the incentives calculated by the Company using the incorrect assumptions exceeded 100 percent of the measure costs. In this filing, the Company seeks to adjust the incentives based on the updated savings and costs in TRM version 3.1, ensuring the C&I Program can offer a cost-effective incentive representative of a more typical scenario seen in the field. Because there was no uptake of the measures in 2020 in Oregon, the Company does not believe there will be an impact on participation due to the changes.

Prescriptive Retrofits Measures

Idaho Power proposes incentive reductions to the following Prescriptive Retrofits measures in Table 5.

Schedule 89 Table 5: RETROFIT – FOOD SERVICE EQUIPMENT

Reduced Incentive

- Reduce incentive for Freezer to dock automatic high speed door from $320/SQFT door opening to $100/SQFT door opening.
- Reduce incentive for Freezer to refrigerator automatic high speed door from $160/SQFT door opening to $50/SQFT door opening.
- Reduce incentive for Refrigerator to dock automatic high speed door from $80/SQFT door opening to $25/SQFT door opening.

Reason

- Incentive amount corrected to align with corrected savings and reduced measure cost assumptions in the TRM version 3.1.

Prescriptive New Construction Measures

Idaho Power proposes incentive reductions to the following Prescriptive New Construction measures in Table 12.

Schedule 89 Table 12: REFRIGERATION FOR NEW CONSTRUCTION, EXPANSION, OR MAJOR RENOVATIONS

Reduced Incentive

Measure Type: Automatic High Speed Doors

- Reduce incentive for Dock to Refrigerator from $80/SQFT door opening to $25/SQFT door opening.
- Reduce incentive for Freezer to Refrigerator from $160/SQFT door opening to $50/SQFT door opening.
- Reduce incentive for Freezer to Dock from $320/SQFT door opening to $100/SQFT door opening.

Reason

- Incentive amount corrected to align with corrected savings and reduced measure cost assumptions in the TRM version 3.1.

The Company respectfully requests that the proposed modifications to Schedules 89 become effective September 8, 2021. If you have any questions regarding this filing, please contact Regulatory Analyst Zack Thompson at (208) 388-2982 or zthompson@idahopower.com.

Sincerely,

Connie Aschenbrenner

Connie Aschenbrenner

CA:sg

SCHEDULE 89
COMMERCIAL AND INDUSTRIAL ENERGY EFFICIENCY
(Continued)

PRESCRIPTIVE RETROFIT INCENTIVES (Continued)

TABLE 4: RETROFIT - OTHER EQUIPMENT

Equipment category	Installing	Replacing	Incentive Per Unit
Laundry Machines	High efficiency washer	Standard washer paired with electric dryer	$200.00/unit
Motor Belts	Type AX notched V-belt Type BX notched V-belt	Type A solid V-belt Type B solid V-belt	$ 5.00/hp* $ 5.00/hp* *Incentive capped at $50/motor
Engine Block Heater and controls	Wall-mounted engine block heater control Engine-mounted engine block heater control High efficiency battery charger	Standard engine block heater without controls Standard engine block heater without controls Traditional battery charger	$100.00/unit $150.00/unit $200.00/unit
High Volume Low Speed Fan	High volume low speed fan	Standard high speed fan	$2,000.00/fan
Compressed Air	VFD on air compressor Low pressure drop filter No-loss condensate drain Efficient compressed air nozzle	No existing VFD Standard filter Open tube with ball valve Standard air nozzle	$200.00/hp $10.00/hp $200.00/unit $80.00/unit

TABLE 5: RETROFIT - FOOD SERVICE EQUIPMENT

Equipment category	Installing	Replacing	Incentive Per Unit	
Refrigeration	Install auto-closer – walk-in	No/damaged auto-closer, low temp.	$400.00/door	
	Freezer to dock automatic high speed door	Manual or electric warehouse door	$100.00/SQFT door opening	(R)
	Freezer to refrigerator automatic high speed door	Manual or electric warehouse door	$50.00/SQFT door opening	(R)
	Refrigerator to dock automatic high speed door	Manual or electric warehouse door	$25.00/SQFT door opening	(R)
	Freezer strip curtain	No protective barrier	$5.00/SQFT door opening	
	Refrigerated strip curtain	No protective barrier	$5.00/SQFT door opening	

SCHEDULE 89
COMMERCIAL AND INDUSTRIAL ENERGY EFFICIENCY
(Continued)

PRESCRIPTIVE NEW CONSTRUCTION INCENTIVES (Continued)

TABLE 12: REFRIGERATION FOR NEW CONSTRUCTION, EXPANSION, OR MAJOR RENOVATIONS			
Measure Type	Incentive	Eligibility Requirements	
Automatic High Speed Doors	$25.00/SQFT door opening	Dock to Refrigerator. Door controls with automatic control to open and close.	(R)
	$50.00/SQFT door opening	Freezer to Refrigerator: Door controls with automatic control to open and close.	(R)
	$100.00/SQFT door opening	Freezer to Dock: Door controls with automatic control to open and close.	(R)

TABLE 13: EQUIPMENT FOR NEW CONSTRUCTION, EXPANSION, OR MAJOR RENOVATIONS		
Measure Type	Incentive	Eligibility Requirements
High Volume Low Speed Fan	$2,000.00 per fan	High volume low speed fans installed
Air compressor VFD	$200.00 per hp	Installing a VFD on the air compressor that allow the compressor to vary the speed based on actual demand.
No-Loss Condensate Drain	$200.00 per unit	Installing a no-loss condensate drain that monitors the amount of condensate present and then exhausts only the condensate without wasting compressed air.
Low Pressure Drop Filter	$10.00 per hp	Installing a low-pressure filter that has a pressure drop between 1 and 3 psi.
Efficient Compressed Air Nozzle	All sizes: $80.00 per unit	Installing an efficient air nozzle that reduces the amount of air compared to a standard nozzle but produces the same performance.