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November 14, 2022

VIA ELECTRONIC FILING

puc.FilingCenter@puc.oregon.gov

Re: Oregon Tariff Advice No. 22-06
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”), to become effective January 1, 2023:

Fourth Revised Sheet No. 89-12 Cancelling Third Revised Sheet 89-12

In its filing, the Company proposes to change the end date of the Small Business Direct Install (“SBDI”) offering (part of the broader Commercial and Industrial Energy Efficiency Program) from December 2022 to March of 2023 to allow time for the offering to reach all eligible Oregon customers prior to ending.

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 2021, Idaho Power claimed 94,887,564 kilowatt-hours (“kWh”) of annual savings for the program on a system-wide basis, and 4,632,899 kWh of annual savings in its Oregon jurisdiction specifically.

SBDI OFFERING

The SBDI offering, contained within Schedule 89, was proposed by the Company on October 30, 2019, in Advice No. 19-11, and provides for the direct install of multiple energy saving products for Idaho Power small business customers at no up-front cost to the participating customer. The SBDI offering is available to small business customers that are served under a commercial schedule in Idaho Power’s Oregon service area, who use up to 25,000 kilowatt-hours (“kWh”) annually. The Commission approved the proposed offering at its public meeting on December 17, 2019.

Subsequent to receiving Commission approval of the SBDI offering, Idaho Power contracted with a third party to recruit customers for participation and perform the direct install of qualified lighting (a variety of Light Emitting Diode (“LED”) bulbs, LED tubes, and new LED fixtures) and non-lighting (smart power strips) measures. The Company anticipated the SBDI offering would operate over a period of approximately three years (November 2019 through December 2022) and would be offered to customers through a regionally targeted effort moving from east to west across the Company’s service area. At the time the tariff was approved, the Company anticipated reaching its Oregon service area by the end of 2022.

The original 3-year timeline was unexpectedly interrupted as on-site work was suspended from March through early October of 2020 due to the COVID-19 pandemic. The 7-month on-site work suspension has resulted in the need to extend the end date of the offering so that all customers in the Company’s service area have a chance to participate. Idaho Power began promoting SBDI to customers in its Oregon service area in August 2022. Therefore, the Company requests to change the end date for the SBDI offering in Schedule 89 from the end of December 2022 to the end of March 2023.

As shown in Table 1. below, the SBDI offering has been cost-effective from the Total Resource Cost (“TRC”) test perspective, and the Company anticipates it will remain cost-effective.

Table 1. SBDI Results

Year	Oregon Projects	Idaho Projects	TRC	Savings (kWh)
2020	0	139	1.61	780,260
2021	0	452	1.54	2,421,842

CONCLUSION

The COVID-19 pandemic delayed on-site work for the SBDI offering for 7 months, which has resulted in the need to extend the end date of an otherwise cost-effective offering. Therefore, the Company respectfully requests the Commission approve the modification to the Schedule 89 tariff, with an effective date of January 1, 2023, stating the offering will run through March 2023 instead of December 2022. If you have any questions regarding this filing, please contact Regulatory Analyst Zack Thompson at (208) 388-2892 or zthompson@idahopower.com.

Sincerely,



Connie Aschenbrenner

CA:sg

SCHEDULE 89
COMMERCIAL AND INDUSTRIAL ENERGY EFFICIENCY
 (Continued)

ENERGY MANAGEMENT (Continued)

DEFINITIONS

Strategic Energy Management (SEM) is a system of organizational practices, policies, and processes that creates persistent energy savings by integrating energy management into business practices by focusing on changes in daily operations that engage staff at all levels of an organization in energy efficiency activities.

Tune-up/system optimization/retro-commission is a focused short-term project to improve the energy usage of an existing specific process, equipment, or system, typically evaluated, documented, addressed, and implemented within a few weeks.

GREEN MOTORS INITIATIVE

The Green Motors Initiative employs industry best practices when rewinding motors (Green Rewind). The certified rewind process ensures that the motor maintains its original efficiency when the rewind is complete. Motors between 15 and 5,000 horsepower are eligible. Idaho Power pays participating service centers \$2.00 per horsepower for each motor that received a verified Green Rewind. Each motor receiving Green Rewind is verified by a non-profit trade organization, Green Motors Practice Group. Motors must be rewound in a certified participating service center that has the equipment and training to perform Green Rewind. For a current list of motor service centers offering Green Rewind please see <https://www.greenmotors.org/motor-service-centershttp://greenmotors.org/practicing.htm>. Some motors may not be able to qualify as a green rewind due to extenuating circumstances, such as a damaged stator or rotor.

SMALL BUSINESS DIRECT INSTALL

QUALIFICATIONS

The Small Business Direct Install program is available to Idaho Power business customers using up to 25,000 kilowatt-hours annually. The program will be offered between November 2019 and March 2023, and will be offered in specific geographic regions of Idaho Power's service area for a limited time during that time period. Eligible customers will be informed by direct mail letter and other marketing strategies when the program will be in their region. Marketing material will include a program website and phone number customers may call to obtain program information and sign up to participate. (c)
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SERVICES PROVIDED

The Small Business Direct Install program will offer to customers the installation of energy efficient products at no cost to the customer. Project installations will be performed by contractors hired by an Idaho Power contractor, and all products and their installation will be paid for by Idaho Power. Project installations may include energy saving LED product, occupancy sensors, and a smart power strip measure, as applicable.