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May 16, 2023

VIA ELECTRONIC FILING

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

RE: Tariff Advice No. 23-03
Modifications to Schedule 71 – Educational Distributions

Attention Filing Center:

Pursuant to ORS 757.205, Idaho Power Company (“Idaho Power” or Company”) herewith transmits for filing Second Revised Sheet No. 71-2, requesting an effective date of July 1, 2023. The purpose of this filing is to obtain approval to remove the LED lightbulbs from the Commercial Energy Efficiency Kit (“Commercial Kit”) in Schedule 71, Educational Distributions (“Schedule 71”), due to the Energy Independence and Security Act (“EISA”) lighting standards going into effect on July 1, 2023.

Second Revised Sheet No. 71-2 Cancelling First Revised Sheet 71-2

SCHEDULE 71

Educational Distributions seeks to use low- and no-cost channels to deliver energy efficiency items directly to customers with a focus on energy efficiency education. The goal for these distributions is to drive behavioral change and create awareness of, and demand for, energy efficiency programs in Idaho Power’s service area. The schedule includes several educational offerings and give-away opportunities including Commercial Energy Efficiency Kits.

PROGRAM BACKGROUND

In February 2016, Idaho Power filed Advice No. 16-03 with the Public Utility Commission of Oregon (“Commission”) requesting approval to implement Schedule 71 to provide direct energy savings opportunities with a focus on energy efficiency education activities offered by the Company. The Commission approved the implementation of Schedule 71 in the Company’s Oregon service area effective March 9, 2016.

In November 2017, Idaho Power filed Advice No. 17-11 to obtain approval of an additional Give-Away Opportunity, Commercial Energy Efficiency Kit (“Commercial Kit”) for small and medium size commercial customers of Idaho Power. In 2018, Idaho Power began offering industry-specific Commercial Kits for restaurants, retailers, and offices. Each kit contained installation instructions and a variety of items intended to help save energy related to lighting, hot water use, and intermittently used electrical devices. Idaho Power used a third-party vendor for kit assembly and mailing. The Company promoted the offering using a variety of marketing tactics such as LinkedIn, pop-up ads on My Account, target emails, and through the Company’s energy advisors who would promote the offering when visiting customers directly or speaking to them on the phone.

In 2021, the Regional Technical Forum deactivated the workbooks and zeroed out the savings for both pre-rinse spray valves and advanced power strips. As a result, very little differentiated the three Commercial Kit configurations for restaurants, retail, and offices. Based on feedback from Idaho Power’s Energy Efficiency Advisory Group (“EEAG”) at the November 2021 meeting, the Company began offering a streamlined kit in 2022. The streamlined kit includes two 9-watt Light-Emitting Diode (“LED”) A lamps, two 8-watt LED BR30 lamps, a bathroom aerator, an exit sign retrofit kit, and a kitchen aerator.

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 with full enforcement and penalties issued as of July 1, 2023.

REQUESTED MODIFICATIONS TO SCHEDULE 71

The savings for Commercial Kits are largely based on the assumed installation rates for each kit item. A 2022 evaluation recommended the Company consider removing exit sign retrofit kits and the aerators due to low installation rates and the associated lower savings. Additionally, the evaluators recommended the Company remove the LED lightbulbs from the kit due to the EISA lighting standards going in effect on July 1, 2023. Once the LED bulbs are removed, the only items remaining in the kit would be one exit sign retrofit kit, one kitchen aerator, and one bathroom aerator which already have low installation rates. Considering the foregoing, the Company has concluded the Commercial Kits will not be cost-effective going forward and as a result the Company proposes to remove this offering from Schedule 71.

STAKEHOLDER ENGAGEMENT

Throughout the life of the Commercial Kit offering, the Company has relied extensively on thoughtful feedback received from EEAG as it has evolved the kits to maintain cost effectiveness. Conversations with EEAG date back to August and November 2021, when the Company was considering consolidation of the kits. Most recently the Company discussed its plans to discontinue the offering at the November 2022 and February 2023 EEAG meetings.

CONCLUSION

The Company respectfully requests the Commission approve Schedule 71, effective July 1, 2023. Please contact Regulatory Analyst Zack Thompson at (208) 388-2982 or zthompson@idahopower.com if there are any questions about this filing.

Sincerely,



Connie Aschenbrenner

CA:sg
Attachment

SCHEDULE 71
EDUCATIONAL DISTRIBUTIONS
(Continued)

SERVICES PROVIDED

Energy savings measures include:

- LED bulbs that fit standard A-lamp sockets, typically 800 lumen and from 2700K - 3000K.
- Residential Energy Efficiency Kits which may include, but are not limited to, one or more of the following measures; LED bulb(s), 2.0 gpm or lower showerhead(s), faucet aerator(s), and/or load sensing power strip.
- In addition, the Company may choose to distribute “other” energy-saving items directly to customers, free of charge. These “other” items may have additional benefits beyond traditional energy savings such as: educating customers about energy efficiency, expediting the opportunity for customers to experience newer technology, and allowing the Company to gather data or validate potential energy savings resulting from behavior change. To qualify as an “other” educational distribution, the initial cost-effectiveness analysis must indicate the item is either currently cost-effective or is expected to be cost-effective in the near future. The energy savings associated with these measures may have a relatively high behavioral component or provide an opportunity to further energy efficiency education of customers.

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