

LISA D. NORDSTROM Lead Counsel Inordstrom@idahopower.com

October 30, 2019

ELECTRONICALLY FILED

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

RE: Tariff Advice No. 19-11

Schedule 89 – Commercial and Industrial Energy Efficiency Schedule 27 – Irrigation Efficiency Rewards Program

Attention Filing Center:

Pursuant to ORS 757.054 and 757.205, Idaho Power Company ("Idaho Power" or "Company") herewith 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") and Schedule 27, Irrigation Efficiency Rewards Program ("Schedule 27"):

Second Revised Sheet No. 89-2
Second Revised Sheet No. 89-3
Second Revised Sheet No. 89-13
Cancelling
First Revised Sheet 89-2
First Revised Sheet 89-3
First Revised Sheet 89-13
First Revised Sheet No. 89-14
Cancelling
Original Sheet No. 89-15

Cancelling
Original Sheet 89-14

Second Revised Sheet No. 27-4 Cancelling First Revised Sheet No. 27-4

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. In its filing, the Company is proposing to add a new initiative – the Small Business Direct Install offering, add new prescriptive measures for the energy efficiency offerings contained within the C&I Program, and modify or remove several existing measures.

The Green Motors Initiative ("Initiative"), included in both Schedules 89 and 27 is an initiative offering incentives to follow industry best practices when rewinding motors to ensure the motor maintains its original efficiency. The Company proposes three housekeeping changes to the Initiative applicable to both Schedules 89 and 27 to update the motor eligibility and vendor website.

SCHEDULE 89

Small Business Direct Install

The proposed Small Business Direct Install ("SBDI") offering will provide for the direct install of multiple energy saving products for Idaho Power small business customers at no cost to the customer. The proposed SBDI offering will apply to small business customers that are served under a commercial schedule in Idaho Power's Oregon service area.

Small business customers, as defined as those commercial customers using up to 25,000 kilowatt-hours ("kWh") annually, are often difficult to engage and lack the resources to install energy efficiency measures on their own. The proposed SBDI offering will provide energy saving products designed to reduce electricity use that will lower electricity bills to this customer group.

Background

Primarily through feedback from stakeholders in the Company's Energy Efficiency Advisory Group ("EEAG"), Idaho Power identified an opportunity to expand its C&I Program to specifically tailor a direct install offering to small business customers. This customer segment can be difficult to reach because they often have limited financial and staff resources to research and participate in energy efficiency programs. The proposed SBDI offering seeks to overcome these hurdles by providing a direct install energy efficiency program for Idaho Power small business customers. Across its service area, the Company has approximately 33,000 metered service locations representing approximately 19,000 customers that qualify for the new offering, with approximately 1,800 metered service locations in the Oregon service area.

Idaho Power has contracted with a third party (program implementer) 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.

Program Design

The Company anticipates the SBDI offering will operate over a period of approximately three years (November 2019 through December 2022), and will be offered to customers through a regionally-targeted effort moving across the Company's service area. The Company will reach Idaho Power's Oregon region after the proposed January 1, 2020, effective date. The program implementer will perform the following activities:

- Recruitment of customers
- Procurement and storage of equipment to be installed at customer sites
- Provide customer warranty on product and installation
- Selection and supervision of local installers
- Coordination of installation schedules
- Project management of the installation
- Provide Idaho Power with project and program data
- Complete customer satisfaction surveys and manage customer disputes

The outreach plan includes geographic areas to target and timeframe, and a review of the marketing strategy to customers. Idaho Power will prepare marketing materials (with program implementer input) that the program implementer will use to recruit customers. The SBDI offering implementer will recruit licensed contractors to perform equipment installation, and Idaho Power has requested they use local contractors where possible.

Idaho Power will pay 100 percent of eligible measure installation. Participants will not have a co-pay as part of the SBDI program.

Following installation of energy efficiency measures, the program implementer will engage participants in customer satisfaction surveys, which may be used to inform changes to the SBDI offering to improve efficacy in that region or remaining targeted regions.

Program Cost-Effectiveness

To determine the cost-effectiveness of a measure or program, Idaho Power relies on the Electric Power Research Institute End Use Technical Assessment Guide ("TAG") and, when applicable, Commission Order No. 94-590 issued in Oregon Docket No. UM 551. Because the Company is not able to estimate the number of individual measures that will be installed per year, the SBDI offering cost-effectiveness is based on annual projected savings of 2,850,000 kWhs from approximately 1,000 locations participating annually. The Company uses the Utility Cost ("UC") test and the Total Resource Cost ("TRC") test as defined in the TAG.

Program	With Program Administrative Costs	
	UC	TRC
Small Business Direct Install	1.00	1.12

Energy Management

The Company proposes to add an Energy Management incentive to the Custom portion of the C&I Program. The Custom Projects offering as a subset of the C&I Program, which is designed to incentivize cost-effective capital investment energy efficiency projects, typically with a 10-year-plus measure life. Adding an incentive option for Energy Management will help Idaho Power support these types of energy-saving projects through a more clearly defined incentive structure. Operational and maintenance measures present a large potential for savings without negatively affecting the customer's service or product. The goal is to generate cost-effective energy savings from measures rooted in low or no-cost operation and maintenance improvements.

Energy Management generally describes those operational improvements in commercial and industrial facilities which result in cost-effective savings from reduced energy utilization compared to current operations as determined by the Company. These projects may include tune-ups, industrial system optimization or retro-commission, strategic energy management ("SEM"), and other non-capital measures. SEM helps build strong partnerships and relationships between customers and Idaho Power, resulting in increased faster implementation of capital projects. The benefit the customer receives from participating in SEM is help from energy coaches to achieve continuous improvement in energy performance over a longer-term period.

This engagement comes with costs in the form of contracted engineering support. Tune ups, system optimization, and retro-commissions can resolve or address problems that have developed throughout the building's life as equipment has aged or the demand has changed. The customer cost is minimal and the cost of the project to Idaho Power is a contracted tune-up engineer.

Under the existing Cost Share Custom Projects incentive, projects are incented up to \$0.18 per kWh saved or 70 percent of the eligible project cost, whichever is less. Energy management projects that Idaho Power has offered under the umbrella of Custom Projects are refrigeration tune-ups, commercial retro-commissioning, and SEM cohorts that have included Refrigeration Operator Coaching for Energy Efficiency, Wastewater Energy Efficiency, Water Supply Optimization, and the Continuous Energy Improvement for Schools. Idaho Power has paid incentives for these offerings under the Cost Share Custom Projects incentive structure at an average of \$0.033/kWh saved. While typically these projects have been capped at 70 percent of the eligible cost, due to the low-cost nature of the measures, the incentive structure does not align well with the shorter measure lives typical of energy management measures. This proposal to adjust the incentive to \$0.025/kWh saved up to 100 percent of the eligible cost will address the issue of shorter measure life and align more closely with other nearby utilities' energy management measures.

Prescriptive Retrofits Incentives

Idaho Power proposes the following Prescriptive Retrofits Incentives measure changes, with the reason for the proposed change:

Schedule 89 Table 1: Retrofit – Lighting and Lighting Controls

Retitle the LED hardwired conversion measure for clarity and increase the incentive to improve program participation. The LED hardwired conversion measure was added in the 2018 program update. Since its addition, Idaho Power program staff have received requests from program participants for further clarity on what qualifies for this The Company proposes to retitle this measure LED hardwired conversion/LED Level 1 retrofit kit to reflect that the more entry level retrofit kits (typically lower cost, component-type kits) are included in this measure and are referred to as Level 1 retrofit kits. Idaho Power proposes to use Level 2 retrofit kits on other measures, as described below. Level 2 retrofit kits are typically at a higher price point with increased quality. The Company also proposes to increase this measure incentive from \$0.05 interior and \$0.02 exterior per kWh reduced to \$0.10 interior and \$0.08 exterior per kWh reduced, as it was determined that the \$0.05 and \$0.02 incentives were too low to spur customer participation. LED hardwired conversions and LED retrofit kits will be updated on the Company's lighting tool found on the Retrofits website (https://www.idahopower.com/energy-environment/ways-tosave/savings-for-your-business/retrofits/) on January 1, 2020, to provide a reference for which incentive level they qualify, Level 1 or Level 2.

- Retitle to provide clarity to the types of retrofit kits eligible for these measures:
 - o "LED fixture or fixture retrofit kit" to "LED fixture or LED Level 2 retrofit kit."
 - "LED fixture or fixture kit with single control strategy" to "LED fixture or LED Level
 2 retrofit kit with single control strategy"
 - "LED fixture or fixture kit with multiple control strategies" to "LED fixture or LED Level 2 retrofit kit with multiple control strategies"
- Modify LED fixture with networked controls measure to include LED Level 2 retrofit kits. Many of the newer, higher quality retrofit kits are now compatible with networked lighting controls.
- Increase the LED sign lighting incentive from \$0.10/kWh interior and \$0.06/kWh exterior to \$0.12/kWh interior and \$0.10/kWh exterior. The Company added a new LED sign lighting measure to incent specialty LED sign lighting in 2018. The new measure was positively received by contractors and lighting tradespeople, but Idaho Power has not experienced the expected participation. After reviewing the average costs for this measure, the Company proposes to raise the incentive to help increase program participation.

In addition, the Company proposes to remove the Complete Lighting Upgrade ("CLU") incentive listed in the Table 1 Notes (item 2) of Schedule 89. The intent of CLU incentive is to encourage and incent customers to retrofit all the interior lighting of their facility, rather than only selecting one or two items with the greatest incentives, by providing a bonus 5 percent of the regular incentive amount for retrofitting all interior inefficient lighting including incorporation of controls. The CLU incentive is not requested frequently, and for many of the limited projects where CLU is requested, it is an afterthought when a contractor realizes they only need to add one or two controls to the space and the project qualifies for CLU incentive. In addition, with the Company's restructuring of some of its new LED fixtures to incorporate lighting controls as integrated measures in 2018, several projects are implementing controls and applying for the CLU incentive for upgrades they would have made regardless of the bonus. The Company believes the CLU no longer provides motivation for customers to make upgrades they otherwise would not make, and to limit free-ridership, the CLU should be removed.

Custom Project Incentives

The Company proposes a housekeeping change to remove the second qualification requirement for Customer Project incentives – "Projects must not be started or equipment ordered until after the Customer has obtained written approval from the Company." The Idaho Power Commercial and Industrial Energy Efficiency Procedures Manual covers the terms and conditions of the program and the pre-approval application process. Having this language in the custom section of the tariff schedule is not consistent with the new construction and retrofits section of Schedule 89.

GREEN MOTORS INITIATIVE - SCHEDULE 89 AND SCHEDULE 27

The Company proposes three housekeeping modifications to the Green Motors Initiative, which is an offering included in both Schedule 89 and Schedule 27. The proposed modifications will (1) reduce horsepower eligibility to 15 horsepower from 25, (2) add language clarifying that

not all motors may qualify due to extenuating circumstances, such as damaged stator or motor, and (3) update the website address for listing of Green Motors Initiative Member Service Centers to https://www.greenmotors.org/motor-service-centers.

The reduction in eligible motor horsepower from 25 to 15 brings Initiative eligibility in conformance with the Regional Technical Forum ("RTF"). The Company added the measure in 2010, at which time rewinds of 15 and 20 horsepower motors did not pass the Participant Cost Test and were not incented by Idaho Power. The RTF approved changes to the Green Motors workbook in 2012, which resulted in different savings assumptions for various horsepower ratings, and the RTF completed the quality assurance process of the workbook in June 2013. The Company's eligibility requirements were not updated at the time to reflect the new lower bound of 15 horsepower which are cost-effective under the UC test and TRC test, and Idaho Power is requesting to bring the Initiative eligibility in line with the RTF.

The Company believes Green Motors Initiative service centers generally reference RTF eligibility guidelines for the Initiative, thus service centers would have likely been aware of the lower 15 horsepower eligibility in 2012. Customers participating in the Initiative have historically taken motors into service centers to determine eligibility, and the Company does not have a record of any Oregon customers being denied incentives for 15 or 20 horsepower motors since 2012.

CONCLUSION

Idaho Power proposes modifications to Schedule 89 to add a new initiative – the Small Business Direct Install offering, add new prescriptive measures for the energy efficiency offerings contained within the C&I Program, modify or remove several existing measures, and proposes changes to an initiative included in both Schedule 89 and Schedule 27.

The Company respectfully requests that the proposed modifications to Schedules 89 and 27 become effective January 1, 2020. If you have any questions regarding this filing, please contact Regulatory Analyst Paul Goralski at (208) 388-2608 or pgoralski@idahopower.com.

Sincerely,

Lisa Nordstrom

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LDN:kkt Enclosures

PRESCRIPTIVE RETROFIT INCENTIVES (Continued)

TABLE 1: RETROFIT - LIGHTING AND LIGHTING CONTROLS (Continued)				
Equipment Category	Installing	Replacing	Incentive Per Unit Exterior/Interior	
Fluorescent Delamping (Only applicable as standard measures)	Delamping Fixture from T12 to 4' T8 (per lamp)	T12 Fixture	\$ 5.00/5.00	
Reduced Wattage T8/T5HO (Only applicable as standard measures)	Reduced wattage 4' T8 & T5HO lamps (per lamp) (ballast <i>must</i> be compatible)	T12 or HID	\$ n/a/1.00	
Relamp T8/T5HO to Reduced Wattage T8/T5HO (Only applicable as standard measures)	Reduced wattage 4' T8 lamps, 28W & 25W (per lamp) Reduced wattage 4' T8 lamps, 25W (per lamp) Reduced wattage 4' T5HO lamps, 47W-49W (per lamp) (In all above cases, ballast/lamps must be compatible)	ttage 4' T8 lamps, 25W (per lamp) ttage 4' T5HO lamps, 47W-49W (per 4' T5HO, 54 watt 5 n/a/1		
Permanent Fixture Removal (Only applicable as standard measures)	Permanent fixture removal as part of overall lighting retrofit project Permanent fixture removal as part of overall lighting	Hardwired fixture using 50-299 input watts Hardwired fixture ≥	\$ 15.00/20.00 \$ 25.00/30.00	
Light Emitting Diodes (LEDs) (Must be on DLC or ENERGY STAR® Qualified Commercial LED List)	retrofit project Screw-in or pin-base LED	300 input watts Screw-in or pin-base lamp using higher wattage	\$0.08/0.12/watt reduced	
	HID LED screw-in replacement lamp	Existing HID lamp using > input watts	\$0.20/0.22/watt reduced	
	Linear LED tube (Types A, B, and DM)	Lamp > 17 watts	\$0.50/0.50/ft	
	Linear LED tube (Type C)	Lamp > 17 watts	\$0.02/0.05/kWh reduced	
	LED hardwired conversion/LED Level 1 retrofit kit	Fixture using higher wattage	\$0.08/0.10/kWh reduced	
	LED fixture or LED Level 2 retrofit kit	Fixture using higher wattage	\$0.12/0.15/kWh reduced	
	LED fixture or LED Level 2 retrofit kit with single control strategy	Fixture using higher wattage	\$0.14/0.18/kWh reduced	
	LED fixture or LED Level 2 retrofit kit with multiple control strategies	Fixture using higher wattage	\$0.16/0.20/kWh reduced	
	LED fixture or LED Level 2 retrofit kit with networked controls	Fixture using higher wattage	\$0.18/0.22/kWh reduced	

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Issued by IDAHO POWER COMPANY By Timothy E. Tatum, Vice President, Regulatory Affairs 1221 West Idaho Street, Boise, Idaho OREGON Issued: October 30, 2019 Effective with Service Rendered on and after: January 1, 2020

PRESCRIPTIVE RETROFIT INCENTIVES (Continued)

TABLE 1: RETROFIT - LIGHTING AND LIGHTING CONTROLS (Continued)				
Equipment Category	Installing	Replacing	Incentive Per Unit Exterior/Interior	
LED Sign Lighting	LED exit sign or equivalent (<5 watts) LED sign lighting retrofit	Exit sign using ≥18 watts Existing using > input watts	\$ n/a/40.00 \$ 0.10/0.12/kWh	
	Wall switch occupancy sensor	Manual or no prior control ≥ 25 input watts	\$ n/a/15.00	
	Ceiling mount occupancy sensor	Manual or no prior control <u>></u> 25 input watts	\$ n/a/30.00	
	Fixture mount occupancy sensor – interior	Manual or no prior control <u>></u> 25 input watts	\$ n/a/25.00	
Lighting Controls	Fixture mount occupancy sensor – exterior	Manual or no prior control, >75 input watts	\$ 15.00/n/a	
	Interior photocell control (dimming, step-dimming or switching)	Manual or no prior control ≥ 25 input watts	\$ n/a/25.00	
	Multiple control strategies on existing LED – interior	Manual or no prior control > 25 input watts	\$ n/a/\$35.00	
	Multiple control strategies on existing LED - exterior	Manual or no prior control, ≥75 input watts	\$ 25.00/n/a	
	Case #1 – T8 fluorescent lighting and electronic ballast (per lamp)	Case #1 – T12 fluorescent lighting	\$0.08/kWh	
Refrigeration Case Lighting	Case #2 – LED display case lighting	Case #2 – T12 fluorescent lighting	\$ 0.15/kWh	
	Case #3 – LED display case lighting	Case #3 – T8 fluorescent lighting	\$ 0.12/kWh	

Table 1 Note:

(T) "Non-standard" incentives are available for cost-effective lighting measures not listed on Table 1. Non-standard

interior lighting incentives will be calculated at \$0.10 per first year annual kilowatt-hour saved up to 70% of measure cost and exterior lighting incentives will be calculated at \$0.08 per first year annual kilowatt-hour saved up to 70% of measure cost.

(D)

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(C)

PRESCRIPTIVE NEW CONSTRUCTION INCENTIVES (Continued)

Engine Block Heater Controls	Wall Mounted: \$50 per unit	Controls that provide a 2-hour delay from first plugged in and will turn on only when outside air drops below a certain threshold.
	Engine Mounted: \$100 per unit	Control that cycles the heater on based on engine temperature.
Dairy VFD	Vacuum Pump: \$250 per hp	Installing a VFD on the pump that slows down the motor during normal operation and then speeds up when necessary.

Note: A Professional Assistance Incentive will be provided to a third-party architect or engineer that submits the application and provides the supporting documentation that is required to complete the application and incentive process. The professional is eligible for an incentive equal to 10% of the participant's total incentive to a maximum amount of \$2,500.

CUSTOM INCENTIVES

QUALIFICATIONS

Project viability will be determined through a collaborative process involving the Company, a participating Customer, and if necessary, a qualified third party or the Customer's licensed Professional Engineer. Potential projects will be evaluated for program eligibility based upon the following criteria:

- The technology must be generally accepted cost-effective energy efficiency technology. This determination 1. will be at the Company's sole discretion.
- 2. Projects must exceed the current established building code requirements or standard practice for the applicable industry as determined by the Company.
- If there is no corresponding prescriptive measure available, then the project may be submitted for review 3. by the Company and, if cost-effective, the project may be eligible for a financial incentive.

OPTIONS

Energy saving projects and measures that are not covered under prescriptive sections of this Schedule may be eligible for Custom Incentives based on the calculated energy savings. There are two incentive options available under the Custom Incentive; the Cost-Share option or the Self-Directed Funds option. The Cost-Share option is available to all Customers that meet the requirements of the Custom Incentive offering. The Self-Directed Funds option is available only to Customers taking service under Schedule 19. The maximum incentive payment will not exceed \$0.18 per first-year kilowatt-hour saved under either incentive option.

Option 1 - Cost-Share. Financial incentives are determined under the Cost-Share option using the lesser of the following two calculations:

- 1. Up to \$0.18 per first-year kilowatt-hours saved
- 2. 70% of eligible project costs

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CUSTOM INCENTIVE OPTIONS (Continued)

OPTIONS (Continued)

(M)

Option 2 - Self-Directed. Under the Self-Directed Funds option, the Customer's contributions to the Energy Efficiency Rider are tracked starting from the latter of the following: June 2005 or the last Cost-Share project paid and funds expected to accrue for a maximum of three years from the date the pre-application is received. Customers selecting this option will have direct use of 100% of the funds for implementation of cost-effective DSM projects. Any funds not utilized by the Customer will remain pooled with the rest of the Energy Efficiency Rider, Schedule 91, funds. Customers may combine individual account funds from multiple sites to implement cost-effective DSM projects under this option. Financial incentives are determined under the Self-Directed option using the lesser of the following two calculations:

- 1. Up to \$0.18 per first-year kilowatt-hours saved
- 2. 100% of eligible project costs

ENERGY MANAGEMENT

(N)

QUALIFICATIONS

Customers may qualify for offerings created to save electricity through operational improvements which, when implemented, result in cost-effective savings compared to current operations as determined by the Company. These projects may include tune-ups, industrial system optimization or retro-commission, strategic energy management, and other non-capital measures on a case-by-case basis. Financial incentives for these kinds of offerings are determined to be the lesser of the following two calculations:

- 1. \$0.025 per kilowatt-hours saved
- 2. 100% of eligible costs

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 25 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.

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OREGON Issued: October 30, 2019

ORIGINAL SHEET NO. 89-15

SCHEDULE 89 COMMERCIAL AND INDUSTRIAL ENERGY EFFICIENCY (Continued)

SMALL BUSINESS DIRECT INSTALL

(N)

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 over a three-year period, November 2019 through December 2022, and will be offered in specific geographic regions of Idaho Power's service area for a limited time during that three-year 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.

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.

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SECOND REVISED SHEET NO. 27-4 CANCELS FIRST REVISED SHEET NO. 27-4

P.U.C. ORE. NO. E-27

SCHEDULE 27
IRRIGATION EFFICIENCY
REWARDS PROGRAM
(Continued)

INCENTIVE OPTIONS (Continued)

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-centers. Some motors may not be able to qualify as a green rewind due to extenuating circumstances, such as a damaged stator or rotor.

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