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IDAHO PUBLIC  
UTILITIES COMMISSION

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**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION FOR A  
DETERMINATION OF 2019 DEMAND-SIDE  
MANAGEMENT EXPENSES AS PRUDENTLY  
INCURRED

Case No. IPC-E-20-15

**CITY OF BOISE CITY'S  
FORMAL COMMENTS**

COMES NOW, the city of Boise City, herein referred to as "Boise City" and pursuant to Rule 202 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.202) and, pursuant to that Notice of Amended Comment Deadlines, Order No. 34739, filed on August 3, 2020, hereby submits its formal written comments and states as follows:

1. Boise City has an interest in ensuring that there is an increase in energy efficiency programs that would qualify for funding under Demand-Side Management ("DSM") programs. This aligns with Boise City's goals of increasing energy efficiency as part of its community-wide goal of 100% clean electricity by 2035 established during 2019 with the Boise's Energy Future plan. Achieving the goal will be reliant on effectively leveraging energy efficiency programs. This

will include both existing customer programs, as well as Idaho Power Company ("the Company") developing and implementing new energy efficiency programs.

2. On March 13, 2020, Company filed this Application, Application for Determination of 2019 Demand-Side Management Expenses as Prudently Incurred, which among other items, describes the Company's evaluation of its current DSM programs and whether they were cost-effective for the year 2019. Historically, the Company used the total resource cost test ("TRC"), the utility cost test ("UCT"), and the participant cost test ("PCT"). As directed in case IPC-E-19-11, Idaho Power was required to evaluate the cost-effectiveness of future DSM programs with the UCT as the primary test in the Integrated Resource Plan. In 2019, eleven (11) of the sixteen (16) energy efficiency programs passed the TRC and UCT tests. (Goralski Direct Testimony at 16 and 17.)

3. Boise City commends the Company on their 2019 DSM and energy efficiency savings which represent the all-time highest annual incremental energy savings achievement since the establishment of the Idaho Energy Efficiency Rider in 2002. Notwithstanding this significant success, the City looks forward to continuing to work with the Company to increase customer participation in efficiency programs to achieve the energy efficiency savings identified in Boise's Energy Future. (Goralski Testimony at 2).

4. Boise City recognizes that the Company engages in many outreach, educational, awareness, and marketing activities that likely result in energy savings experienced by customers that are not quantified or claimed as part of the Company's annual savings. While the City acknowledges the challenges of trying to quantify energy savings from these types of activities,

we believe that the energy savings from these activities are realized and support future efforts to better quantify the extent of the savings (Goralski Testimony at 10).

5. Boise City notes testimony concerning the current negative ending balance of the Idaho Energy Efficiency Rider on December 31, 2019, and supports efforts for appropriate cost recovery and adjustments that ensure adequate funding of the Idaho Energy Efficiency Rider enabling the Company's ability to implement existing programs and deliver new programs, where appropriate. (Goralski Testimony at 14).

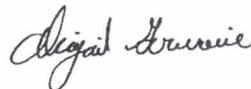
6. Boise City supports the Company's transition of cost-effectiveness testing methods during the 2020 program year to synchronize with the Company's annual Integrated Resource Planning (IRP) cycle including the development of a new DSM Potential Study and an evaluation of immediate opportunities to add measures that are cost-effective under the UCT to existing programs during 2020 (Goralski Testimony at 16).

7. Boise City notes that while the Weatherization Assistance for Qualified Customers and Weatherization Solutions programs did not achieve a 1.0 or greater benefit-to-cost ratio with the UCT or TRC, the City supports these existing programs and encourages the development of additional programs that create opportunities for energy efficiency improvements and cost savings for qualified customers (Goralski Testimony at 20).

8. As mentioned previously, increases in energy efficiency and demand-side management programs support Boise City's community-wide clean electricity goals. Boise City encourages Idaho Power to continue identifying opportunities to expand existing, and develop new, energy efficiency and demand-side management programs. Boise City places particular interest and emphasis on opportunities for programs that address whole home and building

efficiency where multiple energy sources like electricity and natural gas are utilized. Opportunities to coordinate and deliver these programs in coordination with other utilities should be considered. Additionally, Boise City supports the piloting of programs that emphasize customer behavior change and target buildings with high potential for energy savings such as multi-family residential buildings. Finally, considering the local and nation-wide economic impacts of COVID-19, there has never been a greater opportunity or more important time to increase and support programs that have the potential to provide immediate savings and lower long term costs for vulnerable members of our community and throughout the Company's service territory. Boise City respectfully requests that the Commission support adequate and appropriate funding of the Idaho Energy Efficiency Rider and support opportunities to expand existing and develop new energy efficiency and DSM programs.

DATED this 27th day of August 2020.



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Abigail R. Germaine  
Deputy City Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 27th day of August 2020, served the foregoing documents on all parties of counsel as follows:

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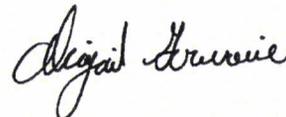
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