

The following comment was submitted via PUCWeb:

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Name of Utility Company: Riverside Electric Co

Case ID: C15-E-23-01

Comment: "TEMPLATE COMMENTS
FOR SUBMISSION TO THE PUBLIC UTILITIES COMMISSION
RE: UNITED ELECTRIC CO-OP, INC. V. CITY OF BURLEY IPUC DOCKET NO. C15-E-23-01

The Commission has invited “all affected utilities” to provide comments supporting or opposing the City of Burley’s Petition for Declaratory Judgment that its existing service territory agreement with United Electric Co-op, Inc. should be terminated, in part, because:
citizens [should] ... not be forced into using one service provider over another based on an agreement 37 years ago.

Burley makes other technical legal arguments why its service territory agreement with United Electric should be terminated that are based on contract law. Those legal arguments are beyond the scope of Riverside Electric Company comments. Instead, Riverside Electric Company limits its comments to emphasize the importance of maintaining the integrity of exclusive electric utility service territories. Idaho utilities operate in exclusive electric utility service territories that require citizens to use one service provider over another. Idaho has never embraced open competition for its electric utilities. In fact, the Idaho legislature has explicitly rejected the entire concept of allowing citizens to arbitrarily select their electric supplier. That is why it adopted the Electric Supplier Stabilization Act (ESSA) which prevents retail competition for electric customers. It has been the law in Idaho for many decades. The express purpose of the ESSA is to promote harmony among and between electric suppliers, prohibit pirating of consumers of another electric supplier, discourage duplication of electrical facilities, actively supervise certain conduct of electric suppliers, and stabilize the territories and consumers served with electricity. Voiding service territory agreements (or laws) will have the opposite effect and will increase costs, cause uncertainty, require duplicative service lines, encourage pirating, and makes long-range utility planning difficult, if not impossible.

Riverside Electric Company believes the Commission has the requisite authority to ensure that existing service territory boundary agreements are enforced and enforceable.

In Sum, Riverside Electric Company, urges the Commission to enforce and uphold the clear State policy of protecting the integrity of electric utility service territories – including duly executed and Commission approved agreements among utilities that establish such territories.

Sincerely,

Chad Surrage
Riverside Electric Company