

DECLARATION

I, DAN SMITH, under penalty of perjury of the law of the State of Idaho, and pursuant to Rule 2.7, Idaho Rules of Civil Procedure, and Idaho Code § 9-1406, declare as follows:

1. I am over eighteen (18) years of age.
2. I am employed as a Residential & Commercial Energy Advisor (“Energy Advisor”) for Idaho Power Company (“Idaho Power”).

3. As an Energy Advisor, I interact with Idaho Power customers and advise customers on energy consumption and billing issues and help resolve sensitive issues with residential customers. In this role, I have visited Karen Erickson’s residence on multiple occasions in an attempt to respond to her requests for assistance and accommodations from Idaho Power for her electric utility account. To the best of my knowledge, Idaho Power has been working with Ms. Erickson for years to resolve this issue.

4. On February 22, 2022, I visited Ms. Erickson’s residence to discuss her past accommodation requests, Idaho Power’s proposals set forth in a letter dated November 22, 2021, as well as Ms. Erickson’s account status. At that time, Ms. Erickson had a past-due balance and was facing disconnection of service after winter protection ended if she did not make a timely payment.

5. I had prepared talking points to read to Ms. Erickson during my February 22 visit. While I was reading aloud my prepared comments, Ms. Erickson stopped me and indicated she could not understand me if I was not looking directly at her while I spoke. I stopped glancing at my notes and discussed Ms. Erickson’s payment of her bill. She offered to provide me cash for her payment, but I did not have the appropriate paperwork to accept a cash payment. I made arrangements with her to return on February 25, 2022.

6. During the meeting on February 22, Ms. Erickson indicated that she had visual and auditory disabilities, and that she believed Idaho Power had not been willing to accommodate her disability requirements. She further requested a case manager, and I informed her I would share that request with Idaho Power but did not make a commitment regarding any accommodations.

7. On February 25, 2022, I returned to Ms. Erickson's residence to take her payment. When I arrived at the residence, Ms. Erickson was present along with several women who observed the meeting and appeared to be taking notes about the conversation.

8. Ms. Erickson again asked to have an ADA appointed case worker present and suggested that it was Idaho Power's responsibility to ensure a case worker was available. She appeared upset that a "case worker" had not accompanied me to her home.

9. To the best of my knowledge, Idaho Power does not have employees with the title of "case worker." However, employees in the Energy Advisor role frequently respond to customer concerns about bills and help residential customers resolve issues and complaints.

10. Ms. Erickson provided me with a cash payment for the past due balance on her account, and she also presented me with a letter to Idaho Power restating her concerns about Idaho Power and her need for accommodations. I provided the letter to the Canyon West Regional Manager.

11. I declare under penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct to the best of my knowledge and belief.

DATED this April 29 2022


DAN SMITH