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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY MOUNTAIN)	
POWER'S APPLICATION FOR AUTHORITY)	CASE NO. PAC-E-21-15
TO REVISE ELECTRIC SERVICE)	
SCHEDULE NO. 300—REGULATION)	COMMENTS OF THE
CHARGES)	COMMISSION STAFF
)	

STAFF OF the Idaho Public Utilities Commission, by and through its Attorney of record, Dayn Hardie, Deputy Attorney General, submits the following comments.

BACKGROUND

On June 23, 2021, PacifiCorp dba Rocky Mountain Power (“Company”) applied to the Commission for authority to revise Electric Service Schedule No. 300 (“Schedule No. 300”)—Regulation Charges—to add a fee for remote reconnection of service. The Company requests an effective date of September 1, 2021, and that its Application be processed by Modified Procedure.

The Company has begun installation of the field area network for advanced metering infrastructure (“AMI”) in its Idaho service territory. Installation of AMI meters will commence in the fourth quarter of calendar year 2021. The Company anticipates completing replacement of existing electric service meters by fall of 2022.

AMI in Idaho will provide a secure network that will allow two-way communications from smart meters. AMI will provide functionality that enables efficiencies in metering and operations,

including the ability to remotely disconnect and reconnect customer service for non-payment and move-in and move-outs.¹

When the AMI is installed and the network is fully in place and operational, the Company anticipates using the remote disconnection and reconnection functions, eliminating the need to dispatch any personnel for these tasks. The Company proposes a remote reconnect fee subject to the terms stated in Rule 10—Termination of Service and Payment Arrangements—for disconnections due to non-payment.

Until AMI capability is operational, if the Company must dispatch personnel to a customer's home, the currently authorized Schedule No. 300 reconnection fees of \$25 or \$50 will apply.

Once the AMI meters are installed and have capabilities to disconnect and reconnect remotely, the Company proposes a remote reconnection fee based on the resources required to process a customer's initial request for a quote to have power turned on but excluding truck or field labor expenses. The proposed remote reconnection fee is \$7 and would be included in Schedule No. 300, if approved.

STAFF ANALYSIS

Staff reviewed the Company's Application and accompanying tariff revisions and supports the Company's proposal to add a \$7 fee for the remote reconnect fee for customers who have AMI meters. The Commission previously found it "reasonable and in the public interest for Idaho Power and Avista to reduce their reconnection charges as proposed...." *See* Order No. 33229 at 11. Additionally, for customers with an AMI meter and remote connect/disconnect capability, the \$7 proposed fee would be a considerable cost reduction in the reconnection fees currently authorized to be collected and it eliminates the need for a variable reconnection fee based on the time-of-day reconnection occurs.

Reconnection Charges

Presently, the amount charged for reconnection to restore service depends on when the customer makes the reconnection request. The Company is currently authorized to collect a Reconnection Charge of \$25 for reconnections during normal business hours and a \$50 for

¹ For a complete list of the efficiencies in metering and operations provided by AMI infrastructure please see the Company's Application at 2.

reconnections outside of normal business hours. The Company's normal office hours are 8:00 am to 4:00 pm Monday through Friday. In situations where the Company has installed meters with remote connect/disconnect capability, Staff believes the reconnection charge should be reduced to recognize the cost savings associated with remote disconnection and reconnection of service.

In Case No. GNR-U-14-01, the Commission approved a reduced Reconnection Charge of \$12 during normal business hours and \$24 for reconnection outside of normal business for similarly situated Avista customers. *See* Order No. 33229 at 11. Additionally in Case No. SUZ-W-19-01, the Commission ordered Suez to reduce its Reconnection Charge by 50% where Suez installed meters with remote connect/disconnect capabilities². *See* Order No. 34405 at 5. In this case, Staff recommends the Commission adopt the Company's proposal.

Staff agrees with the Company that there should be no changes to the current non-remote reconnection fees at this time. As previously mentioned, during the AMI rollout, not all meters will have the ability to remotely disconnect or reconnect service. Until the meter can utilize its full AMI capabilities and the Company must dispatch personnel to a customer's home, the currently authorized Schedule No. 300 non-remote reconnection fees should apply.

Reconnection Process

Once meters have remote disconnection and reconnection capabilities, the Company plans to implement an automated reconnection process. When payment is received through one of the Company's payment channels following involuntary disconnect of service, an order to reconnect service will be automatically generated eliminating the need for the customer to make another phone call to verify payment and request reconnection of service.³ Linking the payment process to the remote connection technology will reduce costs and subsequently lower customers' fees.

An additional benefit is the ability to reconnect service quickly. The Company estimates that once an order to reconnect service is generated, service can be reconnected in less than 60 minutes.⁴

² Reconnection charge reduced from \$20 to \$10 during normal business hours and from \$30 to \$15 outside of normal business hours.

³ See Response to Staff Production Request No. 14.

⁴ See Response to Staff Production Request No. 13.

The Company expects AMI will eliminate most, but not all onsite visits to disconnect and reconnect service. The Company intends to review reconnection charges, including the need for non-remote reconnection charges, once full AMI deployment is complete.⁵

Fee Calculation

Staff recommends that the Company improve its method for calculating reconnection fees going forward to better align the fee with actual costs to reconnect customers. The proposed \$7 fee is based on the Company's average operations and maintenance cost for each call answered by the Company's call center employees in 2017.⁶ The Company used 2017 data to align its reconnection fee across its multi-state service territory.⁷ Using more recent data may have led to a higher reconnection fee.⁸ However, it is not clear that customer agent calls are correlated with customer reconnection. The Company said that it does not track calls specific to reconnection and that customers are not required to call the Company to request reconnection.⁹

Staff recommends that as the Company reconsiders its remote reconnection fee, it should consider fees based on the most recent, Idaho specific data, and should be based on costs directly related to remote reconnection.

Customer Notification and Customer Comments

The Commission established a comment deadline of August 17, 2021. As of August 16, 2021, no customer comments were filed.

STAFF RECOMMENDATION

After examining the Company's Application, proposed tariff revisions, and worksheets, Staff recommends the Commission approve the following:

1. The Commission approve the establishment of a new \$7 fee for remote reconnection of service for customers who have a meter with remote connect/disconnect capability;
2. The Company improve its method for determining reconnection fees based on recent Idaho specific data.

⁵ See Response to Staff Production Request No. 3.

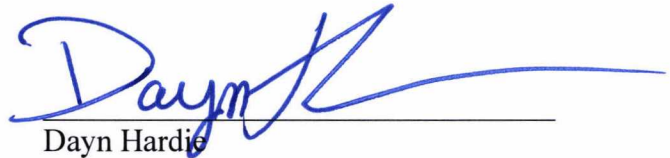
⁶ See Page 3 of the Application and Workpaper "PAC-E-21-15 RMP Workpapers 6-23-21.pdf"

⁷ See Response to Staff Production Request No. 8.

⁸ See Response to Staff Production Request No. 4.

⁹ See Response to Staff Production Request No. 5.

Respectfully submitted this 17th day of August 2021.



Dayn Hardie
Deputy Attorney General

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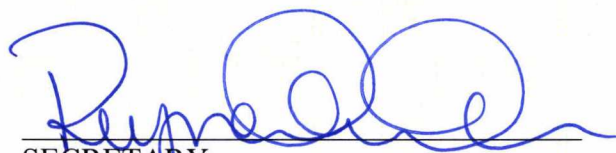
CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 17th DAY OF AUGUST 2021, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. PAC-E-21-15, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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