

RECEIVED

2015 MAR 19 PM 4:22

IDAHO PUBLIC
UTILITIES COMMISSION

LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

March 19, 2015

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

Re: Case No. GNR-U-14-01
Compliance Filing – Customer and Employee Education Plan
Remote Connect/Disconnect Project

Dear Ms. Jewell:

Pursuant to Idaho Public Utilities Commission (“Commission”) Order No. 33229 in Case No. GNR-U-14-01, Idaho Power Company (“Idaho Power” or “Company”) hereby submits an original and four (4) copies of its *Customer and Employee Education Plan*. Idaho Power also provides the following information describing its investigation to date of the pay station capability and prepaid service issues discussed in the Commission’s Order.

PAY STATION CAPABILITY

Consistent with the Commission’s directive contained in Order No. 33229 at 19, the Company has investigated the ability of its authorized third-party pay station services provider Western Union to instantaneously transmit customer payment information. Idaho Power receives a payment file from Western Union once a day. The file includes any payments that were made to Idaho Power at a pay station the previous day. When the file is processed, service disconnects are canceled if the payment satisfies the condition for continued service. Customers who contact the Company or visit its web site are instructed to call Idaho Power with the receipt number immediately after the payment has been made at a pay station to ensure continued service. Once the customer contacts the Company to provide the payment details, the Customer Service Representative sets up a payment arrangement which cancels the service disconnect.

On page 19 of Order No. 33229, the Commission directed the Utilities “to investigate whether procedures or technologies exist that might enable them to instantaneously receive the customer’s payment data, and to relay their findings to Staff.” Idaho Power contacted Western Union, who confirmed that it is not possible for them to send the customer’s payment data to the Company instantaneously. The Company will continue to investigate the ability of its third-party vendor to

instantaneously communicate customer payment information as new technologies become available. However, in the Notice Insert that will be included in the Initial Reminder and Final Termination notice to customers who have remote connect/disconnect meters, Idaho Power instructs customers to call the Company with the receipt number when they make a payment at a pay station to ensure continued service.

PREPAID SERVICE

On page 21 of Order No. 33229, the Commission encouraged the Utilities “to explore the options suggested by Mr. Weber and whether they can use their smart meters to further enhance their customers’ experience, and to share their findings with Staff.” Consistent with the Commission’s request, the Company has determined that the ability to remotely connect and disconnect service is a fundamental requirement for effectively implementing a “prepay” option for electric service. The AMI connect/disconnect functionality currently deployed for approximately 14,500 endpoints meets that fundamental requirement. However, there are a number of additional requirements to implement a “prepay” system including development of:

- Effective methods that enable customers to manage their prepay account, such as:
 - Ability to track their account balance,
 - Notification/alert when the balance on their account reaches a minimum threshold, and
 - Convenient methods for making deposits to prepaid accounts.
- Prepay fees and rules, such as:
 - Setup fees,
 - Deposit requirements,
 - Minimum service requirements, and
 - Arrangements on unpaid balances.
- Back office systems to track and manage prepay services.
- A cost-effective business case for a prepay rate option.

While Idaho Power believes that some form of prepay service will be appropriate in the future and that AMI and remote connect/disconnect functionality provides the foundation, more work needs to be done. The timing of any prepay rate offering will depend on the maturing of the integrations of our various back office systems as well as on our customers’ needs and desires to have a prepay rate option available.

Sincerely,



Lisa D. Nordstrom

**IDAHO POWER COMPANY'S
CUSTOMER AND EMPLOYEE EDUCATION PLAN
FOR REMOTE CONNECT/DISCONNECT PROJECT**

MARCH 19, 2015

INTRODUCTION

Idaho Power Company ("Idaho Power" or "Company") respectfully submits its Customer and Employee Education Plan for the Remote Connect/Disconnect project in compliance with the Idaho Public Utilities Commission ("Commission") Order No. 33229 issued on February 17, 2015, in Case No. GNR-U-14-01. On page 10 of this Order, the Commission directed Idaho Power to submit a revised plan within 30 days of the Order's service date. The Commission further stated that:

The Utilities may achieve this goal through a plan that either: (1) is like Rocky Mountain Power's plan; (2) contains Staff's suggested minimum requirements; or (3) notifies customers of the changes both through: (a) a letter before the changes take effect (as suggested by Idaho Power); and (b) the initial past-due notice and final disconnection notice (i.e. as suggested in Staff's minimum requirement No. 2.b, but with no duty to insert a similar message in the bills of customers with past-due account balances). We also encourage the Utilities to notify customers by highlighting the changes on the Utilities' websites.

Consistent with the Commission's directive, Idaho Power's Customer and Employee Education Plan complies with the third option as described in greater detail below.

CUSTOMER EDUCATION PLAN

Prior to implementing changes authorized by Order No. 33229 granting Idaho Power an exemption from the requirements of Utility Customer Relations Rules 311.04 and .05, Idaho Power will communicate with its customers with remote

connect/disconnect meters to inform them that they have new meters with new technology that allows Idaho Power to remotely disconnect and connect their service, emphasizing that the Company no longer will be accepting bill payments at the door. The correspondence will share information about payment options, as well as provide resources for learning more about the change and how they can contact Idaho Power with questions. This communication will take place in a variety of forms and media:

Direct Mail Letter

Idaho Power will mail a letter to approximately 14,000 residential and 500 non-residential customers with a remote connect/disconnect meter, notifying them of the changes. (Attachment No. 1)

- The letter will be mailed in two waves, half approximately four weeks prior to launch date and the other half approximately two weeks prior to launch date.
- The letter will include a “Payment Options” Insert — A 3¾” X 8” color insert. It summarizes options available to pay their Idaho Power bill, how to register for myAccount, and how to contact Idaho Power. (Attachment No. 2)

Notice Inserts

- The Initial Reminder and Final Termination notice will include a special “Notice Insert” — A 3¾” X 8” color insert to be included in all initial reminder past-due notices and final termination notices of affected customers, specifically communicating they have a remote connect/disconnect meter and payments will no longer be collected at the door to prevent termination of electrical service. The Notice Insert will also identify payment options, as well as information about

how to make payment arrangements, how to designate a third party, how to apply for energy assistance, and how to contact Idaho Power. (Attachment No. 3)

- Web Site — A web page on idahopower.com will be developed to provide information about the remote connect/disconnect meters. Similar to information shared in the letter, it will provide direct links to bill payment options and how to contact Idaho Power with questions or to make payment arrangements. It may also include an image of the meter, describing the benefits of the new technology. General meter information located on other Idaho Power web site pages, such as FAQs and Smart Grid, will be updated to include information about remote connect/disconnect capability.
- Virtual URL — A virtual URL will be created to make it easy to link to the new web page. This URL will be referred to in the letter.

EMPLOYEE EDUCATION PLAN

Customer Service Trainers and Field Service Technical Advisors will provide scheduled training sessions for Customer Service and Field Employees prior to May 2015. These sessions will include an overall discussion of the new meters and refresher training on payment methods. The training will include:

- A FAQ sheet for employees,
- Information regarding what communication has been provided to customers,
- A high level flowchart of the remote disconnect/reconnect process, and
- Increased training for field employees on ways for customers to pay, e.g., electronic payment options, pay stations, drop boxes, etc.

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. GNR-U-14-01
IDAHO POWER COMPANY

**CUSTOMER AND EMPLOYEE
EDUCATION PLAN**

ATTACHMENT NO. 1

[Date]

[Customer name]

[Address line 1]

[Address line 2]

[City, state and zip code]

Dear [customer name],

As part of our commitment to provide you with the best service at the lowest cost possible, we recently installed a new meter at your service location of [address line 1] with advanced technology that will help us deliver better and timelier service to you.

The new meter makes it possible for us to connect or disconnect electrical service remotely, no longer requiring Idaho Power personnel to visit your location for this purpose at any time during the year.

All bills and notices will continue to be delivered to you by mail or e-bill. However, we no longer will accept payments at the door, so it may be necessary to utilize one of our other convenient payment options. A variety of options are available, including No Fee Electronic Check through myAccount, automatic bank debiting with PreferredPay™, mail, credit cards and debit cards with a fee, Idaho Power drop boxes, and pay station locations. Idaho Power also offers a third-party notification service.

For your convenience, we have enclosed a flyer with information on all payment options. You can learn more online at idahopower.com/XXXXX. If you have any questions or comments about your new meter, payment options or third-party notification, please contact our customer service center at 208-388-2323 or 1-800-488-6151 outside of the Treasure Valley.

We appreciate your business and the opportunity to serve you.

Sincerely,

David Joerger
General Manager, Customer Operations

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. GNR-U-14-01
IDAHO POWER COMPANY

**CUSTOMER AND EMPLOYEE
EDUCATION PLAN**

ATTACHMENT NO. 2



PAYMENT OPTIONS

No Fee Electronic Check

Register with myAccount at idahopower.com — your bank routing information is kept secure and confidential

Credit/Debit Card or Check with Fee

At idahopower.com or call NCO Financial toll-free 1-800-829-5415

Pay Stations

Cash or electronic check, accompanied by bottom portion of your bill — some locations do not accept checks or process checks over \$3,000 and hours of operation are subject to change without notice

Drop Boxes at Idaho Power Offices

Checks or money orders only (no cash payments), allowing three business days for processing

PreferredPay™

Automatic bank debiting through Idaho Power

Electronic Billing and Payment — e-bill

Sign up with CheckFree to receive your bill via email and make recurring payments from your bank account with no fee

Mail

Checks and money orders only:
Processing Center, PO Box 34966, Seattle, WA 98124-1966

Sign up for myAccount at idahopower.com

for assistance — including account information changes, new account sign-up, billing questions, payment arrangements, or to turn on and turn off service. Or you can contact our Customer Service Center at 208-388-2323 or toll-free at 1-800-488-6151 (outside the Treasure Valley).

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. GNR-U-14-01

IDAHO POWER COMPANY

**CUSTOMER AND EMPLOYEE
EDUCATION PLAN**

ATTACHMENT NO. 3



IMPORTANT NOTICE

Your service address has a remote connect/disconnect meter.

We are no longer accepting payments at the door, so please be sure to utilize one of our other payment options to avoid termination of electrical service:

- No Fee Electronic Check through myAccount
- Credit cards, debit cards, checks with a fee
- Pay stations (locations available at idahopower.com)
- Idaho Power drop boxes
- U.S. Mail

Please note: If you make a payment on the day of a scheduled service disconnection, please call to let us know you have paid, and have your receipt number available if you have one.

If you are unable to pay your bill in full, please consider these options:

- Set up a payment arrangement at idahopower.com.
- Contact our customer service center at 208-388-2323 or 1-800-488-6151 outside of the Treasure Valley.
- Make arrangements for a third-party notification. You may designate a friend, relative or agency to be a "third-party" on your behalf. With your authorization, this third party will receive copies of any termination notices we send to you because of an overdue utility bill.
- Contact your local Community Action Partnership agency for Energy Assistance (contact information can be found at idahopower.com).

You can learn more about all of these options at idahopower.com/payments.

Remember...we no longer accept payments at the door.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of March 2015 I served a true and correct copy IDAHO POWER COMPANY'S CUSTOMER AND EMPLOYEE EDUCATION PLAN FOR REMOTE CONNECT/DISCONNECT PROJCT upon the following named parties by the method indicated below, and addressed to the following:

AARP Idaho

Mark Estes
AARP Idaho
3080 E. Gentry Way
Meridian, Idaho 83642

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email mestess@aarp.org

Lee Flinn,
AARP Idaho
3080 E. Gentry Way
Meridian, Idaho 83642

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email aflinn@aarp.org

CAPAI

Christina Zamora
CAPAI
3350 West Americana Terrace, # 360
Boise, Idaho 83706

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email czamora@capai.org

CAPAI

Brad M. Purdy
2019 N. 17th Street
Boise, Idaho 83702

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email bmpurdy@hotmail.com

Commission Staff

Karl T. Klein
Deputy Attorney General
Idaho Public Utilities Commission
472 West Washington (83702)
P.O. Box 83720
Boise, Idaho 83720-0074

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email karl.klein@puc.idaho.gov

Rocky Mountain Power

Daniel E. Solander
201 South Main Street, Suite 2300
Salt Lake City, Utah 84111

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email daniel.solander@pacificorp.com

Avista Corporation

David J. Meyer
1411 East Mission Avenue-- MSC-23
P.O. Box 3727
Spokane, Washington 99202

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email david.meyer@avistacorp.com



Kimberly Towell, Executive Assistant