

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER REDFORD
COMMISSIONER SMITH
COMMISSION SECRETARY
COMMISSION STAFF
LEGAL**

**FROM: KARL KLEIN
DEPUTY ATTORNEY GENERAL**

DATE: OCTOBER 10, 2014

**SUBJECT: APPLICATION OF AVISTA, IDAHO POWER, AND ROCKY
MOUNTAIN POWER FOR EXEMPTION TO UTILITY
CUSTOMER RELATIONS RULE 311.04 AND .05, CASE NO. GNR-
U-14-01**

On September 30, 2014, Avista Corporation, Idaho Power Company, and PacifiCorp dba Rocky Mountain Power petitioned the Commission for an Order exempting them from Utility Customer Relations Rule 311.04 and .05. 31.21.01.311.04 and.05. In summary, these rules require a utility employee to try to make face-to-face contact immediately before terminating the customer's service for non-payment to: (1) give the customer a final chance to avoid termination of service by paying the bill at that time (*see* UCRR 311.04); or (2) if the customer does not pay at that time, notify the customer about how the customer can have service reconnected. The utilities explain that they want the option of discontinuing payment at the door practices, and of notifying customers in ways besides providing mandatory on-site personal or paper notice. The utilities seek the exemption so they can use advances in metering, communication, and electronic payment technologies to reduce operating costs and increase the safety of utility employees without sacrificing customer service.

The utilities ask that the exemption take effect at the end of the winter disconnection moratorium on March 1, 2015. In the Application, the utilities ask for the Commission to issue an Order by December 31, 2014, so the utilities will have time to educate customers on the change before the effective date occurs. The utilities have since advised Staff that an Order by early- to mid-January 2015 will also work. The utilities request that the Commission process the case under Modified Procedure.

STAFF RECOMMENDATION

Staff recommends that the Commission issue a Notice of Application and Notice of Modified Procedure setting a December 10, 2014 comment deadline, and a December 17, 2014 reply deadline. Staff also recommends that the Commission direct Staff to hold a telephonic, public workshop for the utilities' customers and other interested persons. The proposed workshop would occur before the initial comment deadline. The utilities have advised Staff that they concur with this type of schedule.

COMMISSION DECISION

Should the Commission issue a Notice of Application and Notice of Modified Procedure setting a December 10, 2014 comment deadline, and December 17, 2014 reply deadline and directing Staff to hold a telephonic public workshop?

Karl T. Klein

Karl T. Klein
Deputy Attorney General

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