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IDAHO PUBLIC
UTILITIES COMMISSION

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September 10, 2019

Ms. Diane Hanian
Secretary
Idaho Public Utilities Commission
PO Box 83720
Boise, ID 83720-0074

RE: Case No. RUL-U-19-01
*UPDATING THE IDAHO PUBLIC UTILITIES COMMISSION, UTILITY
CUSTOMER RELATIONS RULES*

Dear Ms. Hanian:

Idaho Power Company ("Idaho Power" or "Company") appreciates the opportunity to comment on proposed changes to the Idaho Public Utilities Commission ("Commission"), Utility Customer Relations Rules ("UCRR") (IDAPA 31.21.01). Idaho Power has conducted a review of Commission Staff's recommended changes and supports the adoption of these changes with the following modifications:

1. Staff's modification to UCRRs 201.02 and 208: Due to limitations of its current billing system and statements, Idaho Power's existing system cannot accommodate the degree day information requirement if this rule is relocated to 201.02a as recommended by Staff. The Company supports keeping this rule as a stand-alone section and not included within the requirement for billing statements. Alternatively, Idaho Power would also support removing this section in its entirety, as Idaho Power does not receive many requests for degree day adjusted data.
2. Staff modification to UCRR 202: Idaho Power recommends the Commission retain the language that Staff requested to be removed regarding the bill due date: "(or twelve (12) days after mailing or delivery of paper or electronic bill, if bills are mailed or delivered more than three (3) days after the [bill issuance date¹]." This language facilitates utility use of outside vendors to print customer bills more cost-effectively than can be performed by the utility.

Idaho Power also proposes three minor modifications to the UCRRs for Staff's consideration:

1. UCRR 302.01e: As a condition of service, customers typically grant utilities a right of way for the facilities necessary to provide utility service. For instance, section 7 of Idaho Power's Rule C requires the customer to "grant the Company a right of way for the Company's lines and apparatus across and upon the property owned

¹ Staff proposed changing "billing date" to "bill issuance date", thus, Idaho Power maintained change.

or controlled by the customer” at no cost to the Company. To account for instances where access is denied to utility facilities on the customer’s property other than meters (e.g., the service drop), Idaho Power recommends modifying the language “meter” to “utility’s facilities”:

The customer or applicant denied or willfully prevented the utility’s access to the ~~meter~~ utility’s facilities.

2. UCRR 303.01 and 604.01: Idaho Power recommends adding “utility’s rules and regulations” to the grounds for denial or termination of service without prior notice:

Dangerous Conditions. A condition immediately dangerous or hazardous to life, physical safety, or property exists, or if necessary to prevent a violation of federal, state or local safety or health codes, or utility rules and regulations.

This language is consistent with the grounds for disconnecting utility service found in Oregon Administrative Rule 860-021-0305(7) and facilitates immediate utility action to preserve safe utility service to other customers (e.g., customer demand spikes without notice in excess facilities’ capacity to serve). This language also provides utilities with the ability to prompt customers to timely resolve issues involving customer-owned electrical facilities, or other conditions on the customer’s property, that are impairing or likely to impair service, create a hazardous condition, or adversely affect the safe and reliable operation and maintenance of the company’s system (e.g., customer places foundation for residential addition in a location that negatively impacts access to underground service line in violation of utility’s design requirements; Idaho Power design standards prohibit location of swimming pools under service lines).

3. UCRR 306.01: If the intent of the Winter Protection Plan’s prohibition on disconnecting service to vulnerable populations is to promote public safety while minimizing uncollectible amounts in the spring, the Company requests language to clarify that this protection exists “at the primary household” rather than to all service points (which can include non-essential service to metered locations like swimming pools and cabins) on the customer’s account:

Restrictions on Termination of Service to Households with Children, Elderly, or Infirm. Except as provided in Rule 303, no gas or electric utility may terminate service or threaten to terminate service during the months of December through February to any residential customer who declares that he or she is unable to pay in full for utility service at the primary household and whose primary household includes children, elderly or infirmed persons.

Idaho Power has discussed the above recommendations with Rocky Mountain Power and Avista Corporation ("Electric Utilities"). Idaho Power is not aware of any opposition by the Electric Utilities to the above recommendations. If you have any questions regarding these comments, please contact Regulatory Analyst Christina Zwainz at (208) 388-6106 or czwainz@idahopower.com.

Very truly yours,



Lisa D. Nordstrom

LDN/kkt

cc: Linda Gervais, Avista Corp.
Ted Weston, PacifiCorp