

BEFORE THE

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IDAHO PUBLIC UTILITIES COMMISSION PUBLIC
UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
PACIFICORP DBA ROCKY MOUNTAIN)
POWER FOR APPROVAL OF CHANGES)
TO ITS ELECTRIC SERVICE SCHEDULES)
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CASE NO. PAC-E-07-5

**DIRECT TESTIMONY OF DANIEL KLEIN
IDAHO PUBLIC UTILITIES COMMISSION**

SEPTEMBER 28, 2007

1 Q. Please state your name and business address for the
2 record.

3 A. My name is Daniel Klein. My business address is
4 472 West Washington Street, Boise, Idaho.

5 Q. By whom are you employed and in what capacity?

6 A. I am employed by the Idaho Public Utilities
7 Commission (IPUC) as a Utilities Compliance Investigator

8 Q. What is your educational and professional
9 background?

10 A. Prior to my employment with the Idaho Public
11 Utilities Commission, I had two years and nine months of
12 experience working in private industry for Qwest Corporation
13 as a Sales Consultant in Boise, Idaho. I received a Bachelor
14 of Arts Degree of Communication from Boise State University
15 in Boise, Idaho, in May of 1998.

16 Q. Have you previously testified before the
17 Commission?

18 A. No.

19 Q. What is the purpose of your testimony in this
20 proceeding?

21 A. I will address the following consumer issues: (1)
22 proposed changes in connection and reconnection fees; (2)
23 proposed change in time period during which arrangements for
24 reconnection of service can be made; (3) collection agency
25 fees; (4) customer notification; (5) customer relations; and

1 (6) call center performance.

2 Q. Please summarize Staff's recommendations to the
3 Commission as discussed in your testimony.

4 A. Staff recommends that the Commission:

5 (1) Retain the existing reconnection and after
6 hours service connection charges and reject
7 the Company's proposal because of the
8 significant impact on individual customers,
9 the overstated costs, and the use of
10 unnecessarily expensive resources in the
11 Company's cost analysis.

12 (2) Not change the Company's after normal office
13 hours for reconnection of service because the
14 proposed change would have a minimal impact on
15 Company cost but a significant negative impact
16 on the affected customers.

17 (3) Not pass along collection agency fees or
18 collection costs to individual customers
19 because the Company has not provided adequate
20 justification for shifting those relatively
21 minor costs from the general body of
22 ratepayers to individual customers.

23 **PROPOSED CHANGES TO RECONNECTION DURING OFFICE HOURS**

24 Q. The Company proposes to increase its reconnection
25 charge from \$25 to \$30 during normal business hours. Does

1 Staff support this change?

2 A. No. The Company is proposing to recover through
3 its reconnection charge the cost of both disconnection and
4 reconnection of service. The Company maintains the cost
5 associated with both disconnecting and reconnecting service
6 during normal office hours is approximately \$43. The cost of
7 reconnection alone is half that amount. Normal office hours
8 are 8:00 a.m. to 4:00 p.m., Monday through Friday.

9 The Commission has previously supported the
10 position that reconnection fees should only represent those
11 costs associated with reconnection of service. In Order Nos.
12 20600 (Barber Water) and 21939 (Washington Water Power), the
13 Commission disallowed the proposed fees for disconnection of
14 service. The Commission stated,

15 The Commission rejects imposing a charge
16 for actual "disconnection of service" for
17 two reasons: (1) It would add to the financial
18 burden of customers who are already having
19 difficulty paying their bills and (2) it is
20 unreasonable to charge people extra for being
21 deprived of service.

22 Case No. U-1008-289, O.N. 21939, p. 1.

23 PacifiCorp currently charges \$25 for reconnection during
24 business hours. Because PacifiCorp's reconnection charge is
25 already higher than its actual cost (approximately \$22),
there is no justification for increasing its reconnection
charge.

Q. How does PacifiCorp's current reconnection charge

1 compare to other energy utilities in Idaho?

2 A. PacifiCorp currently has one of the highest
3 reconnection charges of the regulated energy utilities in
4 Idaho. See Exhibit No. 114.

5 **PROPOSED CHANGES TO AFTER HOURS RECONNECTION**

6 Q. The Company proposes to increase its after hours
7 service reconnection charge from \$50 to \$100. Does Staff
8 support this change?

9 A. No. The Company is proposing to recover through
10 its after hours service reconnection charge the cost of both
11 disconnection and reconnection of service. "After hours"
12 charges apply for work performed outside of normal business
13 hours. The Company maintains the cost associated with both
14 disconnecting and reconnecting service after normal office
15 hours is approximately \$150. According to the Company, the
16 cost of reconnection alone is approximately \$127. The after
17 hours service reconnection charge applies when a customer has
18 been turned off involuntarily by the Company, subsequently
19 satisfies all criteria for reconnection, and contacts the
20 Company between 4:00 p.m. and 7:00 p.m. weekdays or 8:00 a.m.
21 to 4:00 p.m. on weekends or holidays to request reconnection.

22 Q. Which employees perform reconnection on behalf of
23 the Company?

24 A. Both Collectors and Journeyman Linemen perform
25 service reconnections. Only Journeyman Linemen can perform

1 reconnections when pole work or work on three-phase service
2 is required. The Company was unable to provide Staff with
3 information on how many after hours reconnections actually
4 involve pole work or three-phase service and therefore
5 require a Lineman's expertise. Although 34% of all after
6 hours reconnections are performed by Journeyman Linemen, only
7 12% of all reconnects during normal business hours are done
8 by Linemen. This suggests that Linemen are reconnecting
9 service after hours for reasons other than the need for their
10 technical expertise. To the extent this is true, after hours
11 reconnection costs are driven up unnecessarily, because a
12 Journeyman Lineman's activity rate is almost double that of a
13 Collector.

14 Another factor that drives up costs is that
15 Collectors and Linemen are paid for at least two hours for
16 any work done after normal business hours per labor contract.
17 However, the Company has indicated that the average time
18 taken for a reconnection visit is 25 minutes. It appears
19 that the Company's after hours reconnection costs are heavily
20 influenced by factors other than the actual cost of providing
21 the service to customers.

22 Q. Have other States approved an after hours
23 reconnection fee that is higher than that being proposed in
24 this case?

25 A. Yes. In Oregon, a \$175 fee applies for after hours

1 reconnections. Staff does not know what the Company's costs
2 are in Oregon or what factors the Oregon Commission used in
3 deciding to approve this charge. However, the Oregon charge
4 only applies to weekend and holidays from 8:00 a.m. to
5 6:00 p.m. It does not apply to after hours reconnections on
6 weekdays. Therefore, the Oregon charge is not directly
7 comparable to Idaho.

8 Q. How does PacifiCorp's current after hours service
9 reconnection charge compare to other energy utilities in
10 Idaho?

11 A. PacifiCorp currently has the highest after hours
12 service reconnection charge of the regulated energy utilities
13 in Idaho. See Exhibit No. 114.

14 **PROPOSED CHANGES TO CONNECTION OF SERVICE AFTER HOURS**

15 Q. The Company proposes to increase its after hours
16 service connection charge from \$50 to \$100. Does Staff
17 support this change?

18 A. No. The after hours service connection charge
19 applies when a customer contacts the Company between 4:00
20 p.m. and 7:00 p.m. or on weekends or holidays to request new
21 service or contacts the Company during normal office hours to
22 request connection after hours. The Company maintains that
23 it is proposing this change to better reflect the cost of
24 providing this service. The Company maintains the cost
25 associated with connecting service after normal office hours

1 is approximately \$127.

2 Q. How does PacifiCorp's current after hours service
3 connection charge compare to other energy utilities in Idaho?

4 A. PacifiCorp currently has the highest after hours
5 service connection charge of the regulated energy utilities
6 in Idaho. See Exhibit No. 114.

7 Q. Is the same cost justification used by the Company
8 to support its request for a higher connection charge as was
9 used for its request for a higher reconnection charge?

10 A Yes. The same arguments used by Staff in urging
11 the Commission not to approve the Company's request to double
12 its after hours reconnection fee apply to the request to also
13 double its connection fee.

14 Q. Have other States approved an after hours
15 reconnection fee that is higher than that being proposed in
16 this case?

17 A. Yes. The Company indicated that it was allowed to
18 charge customers a higher after hours connection fee in
19 California and Oregon than the one proposed currently in
20 Idaho (\$100). Staff does not know what the Company's costs
21 are in Oregon and California or what factors the Oregon and
22 California Commissions used in deciding to approve this
23 charge. However, the Oregon charge (\$175) only applies to
24 weekends and holidays from 8:00 a.m. to 6:00 p.m. The
25 California charge (\$175) applies after 8:00 p.m. and anytime

1 on the weekends or holidays. In Idaho, the after hours
2 charge applies during weekdays from 4:00 p.m. until 7:00 p.m.
3 as well as 8:00 a.m. to 4:00 p.m. on weekends and holidays.
4 Therefore, the Oregon and California charges aren't directly
5 comparable to Idaho.

6 Q. Does the Company charge customers for service
7 connection during regular office hours.

8 A. No. The Company currently does not assess a
9 connection charge in Idaho during normal business hours. The
10 Company is not proposing to institute a connection charge
11 during normal business hours in this case. The Company
12 considers connection during business hours to be a cost of
13 doing business to be recovered through rates instead of a fee
14 directly charged to individual customers.

15 **IMPACT OF PROPOSED FEES**

16 Q. What is the overall revenue impact of the Company's
17 proposed changes to its reconnection, after hours service
18 reconnection, and after hours connection charges?

19 A. The proposed changes to connection and reconnection
20 fees would result in a total increase in revenue of \$14,750
21 based on the Company's 2006 numbers. If approved, the effect
22 on rates and revenue would be negligible, but the same cannot
23 be said for customers who would have to pay these charges.

24 Q. What is the potential impact on customers?

25 A. The proposed changes to connection and reconnection

1 fees would have a significant impact on customers. The
2 increases would affect customers who probably already have
3 problems paying their bills, and the new fees would place an
4 even greater financial burden on them.

5 Q. What is Staff's overall recommendation for the
6 proposed changes to the Company's connection and reconnection
7 charges?

8 A. Staff recommends that the Commission reject the
9 proposed changes to the Company's connection and reconnection
10 charges. The Company has not provided sufficient
11 justification for increasing its fees, especially to the
12 degree it is proposing. PacifiCorp's current fees are
13 already the highest approved fees for energy utilities in
14 Idaho. See Exhibit No. 114. The proposed increase of the
15 after hours service connection and reconnection fees would
16 make the Company's fees twice the amount of any other
17 company's fees during a similar time frame.

18 **PROPOSED CHANGE IN HOURS OF RECONNECTION**

19 Q. Is PacifiCorp proposing any other changes to
20 reconnection of service?

21 A. Yes, the Company is proposing to change the hours
22 during which after hours reconnection of service will be
23 offered.

24 Q. What is the procedure for assessing charges for
25 reconnection of service?

1 A. For the purpose of reconnecting service and
2 assessing fees for reconnection, the Company uses the time
3 the customer satisfies all requirements for reconnection of
4 service to determine whether the normal business hours or
5 after hours charge will apply. The actual time that service
6 is reconnected is immaterial. The Company currently offers
7 after hours reconnection from 4:00 p.m. and 7:00 p.m., Monday
8 through Friday, excluding holidays. The Company is proposing
9 to change the cutoff time for reconnections during weekdays
10 to 6:00 p.m. Last year 115 customers contacted the Company
11 and requested reconnection between 4:00 p.m. and 7:00 p.m.
12 Very few (twelve) of those customers contacted the Company
13 between 6:00 p.m. and 7:00 p.m. If the Company were allowed
14 to shorten the hours that it offers after hours service
15 reconnection as requested, these twelve customers would not
16 have been reconnected until the following day, even if all
17 conditions for reconnection had been satisfied. Leaving the
18 cut off at 7:00 p.m. allows customers a greater opportunity
19 to restore service that same day. Not every customer that is
20 disconnected involuntarily will have the opportunity to
21 discover that their service has been disconnected by the
22 6:00 p.m. cutoff, let alone make payment or arrangements to
23 restore service. Staff recommends that the Company retain
24 its after office hours of 4:00 p.m. to 7:00 p.m., providing
25 affected customers with a three-hour window of opportunity to

1 get reconnected that same day.

2 **COLLECTION AGENCY FEES**

3 Q. The Company proposes changes to Regulation No. 10.
4 Does Staff support this change?

5 A. No. The Company proposes to add language to
6 Regulation No. 10R.8 to indicate that customers are
7 responsible for reasonable court costs, attorney's fees
8 and/or collection agency fees incurred in the collection of
9 unpaid debt.

10 Q. In general, what are the terms offered by
11 collection agencies in collecting debts owed to a business?

12 A. Businesses often send accounts to a quick collect
13 type of agency that charges a flat fee to try and collect the
14 debt within 30 days. The account is returned to the business
15 at no charge if it is not successful. Businesses will then
16 send the account to a full service collection agency, which
17 will pursue the debt to its fullest extent, including
18 charging interest and taking debtors to court. This type of
19 collection agency generally does not charge the business any
20 fees; it takes a percentage of the money collected from the
21 debtor. If a debtor was taken to court, a collection agency
22 may keep as much as 50% of the collected debt. Under this
23 type of arrangement, the business does not receive the entire
24 amount owed by the debtor. It is unclear whether the Company
25 wishes to recover from its former customers collection

1 expenses over and above what collection agencies charge the
2 debtor.

3 PacifiCorp stated that it spent \$24,000 in
4 collection agency fees to collect \$88,000 in debt or \$.27 on
5 every dollar collected. This does not appear to be an
6 excessive expense. If the Commission allowed recovery of
7 these fees, it would not materially affect revenue or rates.
8 The Commission currently allows the recovery of uncollectible
9 costs to be recovered through rates. No other regulated
10 energy utility in Idaho is allowed to pass collection agency
11 costs to individual customers who have outstanding bills.
12 Utilities are allowed to assess interest on past due amounts
13 when customers do not pay their bills in a timely manner. To
14 the extent that a Company decides to employ collection
15 agencies instead of pursuing collection through its own
16 efforts, the Company should bear those costs associated with
17 that business decision. Staff does not agree that PacifiCorp
18 should pass along collection agency fees to individual
19 customers.

20 **CUSTOMER NOTICE AND PRESS RELEASE**

21 Q. Did Staff review the Customer Notice and Press
22 Release?

23 A. Yes. The Customer Notice and Press Release were
24 included in PacifiCorp's Application. The Application was
25 received on June 8, 2007. Staff reviewed the Customer Notice

1 and Press Release and determined they were in compliance with
2 the requirements of IDAPA 31.21.02.102.

3 **CUSTOMER RELATIONS**

4 Q. Please describe how many and what type of
5 complaints and inquiries the Commission has received
6 regarding PacifiCorp.

7 A. Exhibit No. 115 shows the number of informal
8 complaints and inquiries received over the past four years.

9 Q. What did your analysis of complaints and inquiries
10 received by the Commission from 2005 to 2007 YTD reveal?

11 A. Of the complaints and inquiries received by the
12 Commission for 2004 and 2005, about one-third involved credit
13 and collection issues. Most of those were from customers who
14 had been disconnected due to non-payment of their accounts or
15 had been notified that they were in jeopardy of losing their
16 service due to non-payment. Concerns about line extensions
17 and billing together comprised over 40% of total contacts
18 with customers during 2004 and 2005.

19 In 2006, the Commission received fewer complaints
20 and inquiries from PacifiCorp customers when compared with
21 the prior year. Complaints and inquiries regarding credit
22 and collection issues decreased, but concerns about line
23 extension remained relatively high, comprising over 40% of
24 the total contacts in 2006.

25 Currently in 2007, credit and collection (26%) and

1 line extension (23%) issues continue to be the major concerns
2 expressed by customers.

3 Staff reviewed all PacifiCorp complaints concerning
4 Line Extension/Installation and Service Outage/Repair for
5 2005, 2006, and year to date 2007, and did not find any
6 trends or patterns that warranted further investigation. In
7 regard to line extensions, the issues raised most often were
8 in regard to cost and who is responsible to pay for that cost
9 as well as delays caused by either weather, changes made by
10 the customer, or the actions of the customer. Staff found
11 that the Company had followed its tariff in all accounts.
12 The complaints that pertained to billing dealt with rate
13 schedules, billing due to slow or dead meters, and recurring
14 and non-recurring charges not related to usage.

15 Q. To what might PacifiCorp's good performance with
16 regard to the low number of complaints and inquiries be
17 attributed?

18 A. When PacifiCorp merged with Scottish Power in 1999,
19 eight customer service guarantees and seven performance
20 standards were established. The guarantees and standards
21 were subsequently modified in 2005. When the Commission
22 approved MidAmerican Energy Holdings Company's (MEHC)
23 acquisition of PacifiCorp in 2006 (Case No. PAC-E-05-8), the
24 seven customer service guarantees and six performance
25 standards in effect at that time were retained. Exhibit

1 No. 116 describes these guarantees and standards in greater
2 detail. MEHC and PacifiCorp committed to continue the
3 guarantees and standards through 2011. The guarantees
4 provided conditions under which customers received payouts
5 from the Company when the Customer service guarantees were
6 not met. Customer service guarantees provide clear
7 performance goals for employees and provide motivation for
8 better customer service.

9 Q. With respect to the customer guarantees and
10 performance standards, how is the Company performing?

11 A. The standards and guarantees have been successful
12 in driving performance improvements. The Company regularly
13 reports on its performance and meets with Staff to discuss
14 its progress in meeting its goals.

15 Q. Is PacifiCorp responsive to the Commission's
16 Utility Compliance Investigators during complaint
17 investigation?

18 A. Yes. Rule 404 in the Utility Customer Relations
19 Rules states that within ten business days of receiving
20 notification from the Commission that an informal complaint
21 involving the Company has been filed with the Commission,
22 utilities must either respond orally or in writing to the
23 Commission. YTD 2007 the average length of time to resolve
24 informal PacifiCorp complaints was 4.32 days. PacifiCorp is
25 well within the acceptable parameters set by the UCRR.

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CALL CENTER PERFORMANCE

Q. What are PacifiCorp's performance objectives for its call centers?

A. PacifiCorp's performance objective is to answer 80% of its calls within 30 seconds.

Q. Is PacifiCorp's goal reasonable?

A. Yes. In Staff's opinion, service levels of 80% of calls answered within the range of 20-30 seconds are reasonable.

Q. How have PacifiCorp's call centers performed?

A. Very well. Staff requested call center data for 2005, 2006, and year to date 2007. The Company provided 30 months of data. The Company's call centers achieved their performance objectives in 20 of those months. The lowest service level during that time period was 75% and the high was 85%. During the last 15 months of data, the Company achieved a service level of 79% or higher.

Q. Does this conclude your direct testimony in this proceeding?

A. Yes, it does.

ENERGY UTILITIES

ESTABLISHMENT OF SERVICE CHARGES

Atlanta Power – Connection Charge

\$25

Schedule 4, page 4

The charge applies to a customer establishing service for the first time at a service location.

Idaho Power – Service Establishment Charge

\$20 for Schedules 1, 7, 9, 19, 24 & 25

Sheet F-1, Rule F; Sheet 66-2, Schedule 66

The charge applies to a customer establishing service at a location where service is currently energized. See list of Reconnection Charges for charges applicable to a customer establishing service at a location where service is *not* currently energized. An owner/manager with a Continuous Service Agreement will not be charged a Service Establishment Charge. Instead, he/she is charged a Continuous Service Reversion Charge each time service reverts to the owner/manager's name. A tenant establishing service at a location with a Continuous Service Agreement will pay the Service Establishment Charge.

Intermountain Gas – Account Initiation Fee

\$14 during normal business hours; \$40 all other times

Sheet 5, Section A, 9.5

The charge applies to each new account opened. It does not apply to rental property covered by a continuous service agreement or to safety inspections of new buildings or equipment prior to turn on.

Rocky Mountain Power – Service Connection Charge

\$50 from 4 to 7 p.m., Monday-Friday, except holidays; \$50 from 8 a.m. to 4 p.m., weekends or holidays

Sheets 3R.1 and 300.1, Schedule 300

There is no charge for establishment of service during normal office hours, 8 a.m. to 4 p.m., Monday-Friday, except holidays. A charge applies to each new account opened at times other than normal office hours.

Avista – New Customer Turn-On Charge

\$48 after normal business hours

Electric: Sheet 70-d, Rule 6.1

Gas: Sheet 170-E, Rule 6.1

There is no charge for establishing service during normal business hours. The charge applies to each new gas or electric customer service connection at times other than normal office hours. If gas and electric service connections are performed at same time, only one \$48 charge applies.

ENERGY UTILITIES
RECONNECTION CHARGES

Atlanta Power – Reconnection Charge

\$25 for customers disconnected for a period of 30 days or less; \$200 for customers disconnected for more than 30 days

Schedule 4, page 4

Idaho Power – Service Connection Charge

Schedules 1, 7 & 9

Connect/reconnect on weekdays

\$20 for customer request from 7:30 a.m. to 6 p.m.

\$45 for customer request from 6:01 p.m. to 9 p.m.;

\$80 for customer request from 9:01 p.m. to 7:29 a.m.

Connect/reconnect on weekends & holidays

\$45 for customer request from 7:30 a.m. to 9:00 p.m.

\$80 for customer request from 9:01 p.m. to 7:29 a.m.

Schedules 15, 19, 24, 25, 40, 41 & 42

Connect/reconnect on weekdays

\$40 for customer request from 7:30 a.m. to 6 p.m.

\$65 for customer request from 6:01 p.m. to 9 p.m.;

\$100 for customer request from 9:01 p.m. to 7:29 a.m.

Connect/reconnect on weekends & holidays

\$65 for customer request from 7:30 a.m. to 9:00 p.m.

\$100 for customer request from 9:01 p.m. to 7:29 a.m.

Sheet F-1, Rule F; Sheets 66-2 & 66-3, Schedule 66

The charge applies to customers who are establishing service or requesting reconnection of service at a premise where service is not currently energized.

Intermountain Gas – Reconnection Charge

\$20 for reconnections performed during normal business hours (8 a.m.- 5:00 p.m., Monday- Friday, except holidays); \$40 all other times

Sheet 5, Section A, 9.4

The charge applies to reconnection performed after involuntary disconnection of service.

Rocky Mountain Power – Reconnection Charge

\$25 during hours of 8 a.m. to 4 p.m., Monday-Friday, except holidays
\$50 from 4 to 7 p.m., Monday-Friday, except holidays
\$50 from 8 a.m. to 4 p.m., weekends or holidays
Sheets 10R.7 & 10R.8; Sheet 300.2, Schedule 300

The charge applies to reconnection performed after the customer is disconnected involuntarily. If the customer pays or makes satisfactory arrangements during the hours of 8 a.m. to 7 p.m. weekdays, excluding holidays, or 8 a.m. to 4 p.m., weekends and holidays, reconnect will be done the same day. If payment or arrangements are made at other times, the company will reconnect service the following day, except in the case of medical emergencies and disconnect in error, which will be done the same day.

Avista – Reconnection Charge (involuntary disconnects) & Gas Service Reestablishment Charge or Electric Reestablishment Charge (voluntary or seasonal disconnects)

Gas & electric service

\$24 during hours of 8 a.m. to 4 p.m., Monday-Friday, except holidays
\$48 from 4 to 7 p.m., Monday-Friday, except holidays
\$48 weekends or holidays
Gas: Sheet 170-G.1, Rule 15.1; Sheet 170-G.2, Rule 15.2
Electric: Sheet 70-g.1, Rules 14.1 & 14.2

The Reconnection Charge applies to reconnection performed after the customer is disconnected involuntarily. If the customer pays or makes satisfactory arrangements during the hours of 8 a.m. to 7 p.m. weekdays, excluding holidays, or 8 a.m. to 4 p.m., weekends and holidays, reconnect will be done the same day. If payment or arrangements are made at other times, the company will reconnect service the following day, except in the case of medical emergencies and disconnect in error, which will be done the same day.

The Gas Service Reestablishment Charge or Electric Reestablishment Charge applies if service is reestablished after the customer voluntarily requests disconnection, including seasonal disconnection of service. If arrangements for reconnection are made during hours of 8 a.m. to 7 p.m. weekdays, excluding holidays, reconnection will take place the same day. If arrangements are made on holidays, weekends, or hours between 7 p.m. and 8 a.m. weekdays, the company will reconnect service the following day, except in the case of medical emergencies and disconnect in error, which will be done the same day. If service is reestablished within 12 months of the date of voluntary or seasonal disconnection, the customer must also pay the monthly minimum charge for each month during which service was disconnected.

**PacifiCorp Idaho Complaints
2004 - 2007**

	2004	2005	2006	2007
Credit & Collections	15	15	4	9
Line Extension/Installation	9	12	7	8
Service Outage/Repair	5	6	5	4
Billing	10	10	6	3
Rates & Policies	5	4	6	4
All Other	0	0	1	0
Total	44	47	29	28

**PacifiCorp Idaho Inquiries
2004 - 2007**

	2004	2005	2005	2007
Credit & Collections	0	1	0	2
Line Extension/Installation	1	0	0	2
Service Outage/Repair	1	0	0	2
Billing	1	0	2	0
Rates & Policies	2	1	1	8
All Other	0	0	2	1
Total	5	2	5	15

**PacifiCorp Idaho Complaints & Inquiries
2004 - 2007**

	2004	2005	2006	2007
Complaints	44	47	29	28
Inquiries	5	2	5	15
Total Contacts	49	49	34	43

EXECUTIVE SUMMARY

Rocky Mountain Power Power Delivery has a number of Customer Service Standards and Service Quality Measures with performance reporting mechanisms currently in place. These standards and measures define Rocky Mountain Power's target performance (both personnel and network reliability performance) in delivering quality customer service. The Company developed these standards and measures using industry standards (to the extent they exist) for collecting and reporting performance data. In some cases, Rocky Mountain Power has decided to exceed these industry standards. In other cases, largely where the industry has no established standards, Rocky Mountain Power has developed metrics, targets and reporting. These standards and measures can be used over time, both historically and prospectively, to measure the service quality delivered to our customers.

1 Service Standards Program Summary

Effective April 1, 2005 through March 31, 2008

1.1 Rocky Mountain Power Customer Guarantees

<u>Customer Guarantee 1:</u> Restoring Supply After an Outage	The Company will restore supply after an outage within 24 hours of notification with certain exceptions as described in Rule 25.
<u>Customer Guarantee 2:</u> Appointments	The Company will keep mutually agreed upon appointments which will be scheduled within a two-hour time window.
<u>Customer Guarantee 3:</u> Switching on Power	The Company will switch on power within 24 hours of the customer or applicant's request, provided no construction is required, all government inspections are met and communicated to the Company and required payments are made. Disconnections for nonpayment, subterfuge or theft/diversion of service are excluded.
<u>Customer Guarantee 4:</u> Estimates For New Supply	The Company will provide an estimate for new supply to the applicant or customer within 15 working days after the initial meeting and all necessary information is provided to the Company.
<u>Customer Guarantee 5:</u> Respond To Billing Inquiries	The Company will respond to most billing inquiries at the time of the initial contact. For those that require further investigation, the Company will investigate and respond to the Customer within 10 working days.
<u>Customer Guarantee 6:</u> Resolving Meter Problems	The Company will investigate and respond to reported problems with a meter or conduct a meter test and report results to the customer within 10 working days.
<u>Customer Guarantee 7:</u> Notification of Planned Interruptions	The Company will provide the customer with at least two days notice prior to turning off power for planned interruptions.

