

## **DECISION MEMORANDUM**

**TO:           COMMISSIONER KJELLANDER  
COMMISSIONER RAPER  
COMMISSIONER ANDERSON  
COMMISSION SECRETARY  
COMMISSION STAFF  
LEGAL**

**FROM:       KARL T. KLEIN  
DEPUTY ATTORNEY GENERAL**

**DATE:       MARCH 4, 2016**

**SUBJECT:   ROCKY MOUNTAIN POWER'S APPLICATION TO MODIFY  
ELECTRIC SERVICE REGULATION 9 – DEPOSITS AND ADVANCE  
PAYMENTS, CASE NO. PAC-E-16-06**

On February 16, 2016, PacifiCorp dba Rocky Mountain Power applied to the Commission for an Order authorizing the Company to modify Electric Service Regulation No. 9 – Deposits and Advance Payments. Regulation 9 governs the circumstances under which the Company can require a customer to: (a) pay in advance before receiving service, with the Company to credit the payment to the customer's account at a later date; or (b) make a reimbursable deposit to secure a future payment or performance.

Regulation 9 currently applies different rules to three distinct customer groups: a residential group; a small commercial group; and a group combining the large commercial, industrial, and irrigation customer classes. The Company notes, however, that as of December 15, 2016, the Company's 58 customers on Schedule 10 – Irrigation and Soil Drainage Pumping Power Service – had a total balance in arrears of about \$1.6 million. Accordingly, with this Application, the Company seeks to place the irrigation customers in a fourth, irrigation specific group under Regulation 9. The Company states that the fourth group would contain irrigation specific rules that will help to further reduce risk and mitigate bad debt expense for the Company and its customers.

The Company asks the Commission to process the Application under Modified Procedure, with the proposed changes to take effect on May 16, 2016.

**STAFF RECOMMENDATION**

Staff recommends that the Commission issue a Notice of Application and Notice of Modified Procedure setting an April 15, 2016 comment deadline, and an April 21, 2016 reply deadline.

**COMMISSION DECISION**

Does the Commission wish to issue a Notice of Application and Notice of Modified Procedure setting an April 15, 2016 comment deadline and an April 21, 2016 reply deadline?

*/s/ Karl Klein*  
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Karl Klein  
Deputy Attorney General

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