

Avista Corp.
1411 East Mission PO Box 3727
Spokane, Washington 99220-3727
Telephone 509-489-0500
Toll Free 800-727-9170

AVU-E-07-09



August 30, 2007

RECEIVED

2007 AUG 31 11 A 9:17
IDAHO PUBLIC
UTILITIES COMMISSION

Jean Jewell, Secretary
Idaho Public Utilities Commission
W. 472 Washington Street
Boise, ID 83720

Re: Avista Corporation's Application to Implement A Pilot Program for Remote Disconnects and Reconnects

Dear Ms. Jewell:

Enclosed for filing with the Commission is an original and 7 copies of the Company's request for approval of a one-year "Remote Disconnect/Reconnect Pilot Program" and a request that the Commission provide the Company with a limited waiver of IDAPA 31.21.01 (311.03) and (311.04) [Utility Customer Relation Rules] for the term of the pilot.

The Company requests that this filing be processed under the Commission's Modified Procedure rules.

Please direct any questions on this matter to myself at (509) 495-4975 or Steve Plewman at (509) 495-4625.

Sincerely,

A handwritten signature in cursive script that reads "Linda Gervais".

Linda Gervais
Regulatory Analyst
Avista Corporation
linda.gervais@avistacorp.com

Enclosures

DAVID J. MEYER
VICE PRESIDENT AND CHIEF COUNSEL FOR
REGULATORY AND GOVERNMENTAL AFFAIRS
AVISTA CORPORATION
P.O. BOX 3727
1411 EAST MISSION AVENUE
SPOKANE, WASHINGTON 99220-3727
TELEPHONE: (509) 495-4316
FACSIMILE: (509) 495-8851

RECEIVED
2007 AUG 31 A 9 17
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF AVISTA CORPORATION FOR THE)
AUTHORITY TO IMPLEMENT A PILOT)
PROGRAM FOR REMOTE DISCONNECTS)
AND RECONNECTS)

CASE NO. AVU-E-07-09

APPLICATION OF AVISTA CORPORATION

1 **I. INTRODUCTION**

2 Avista Corporation, doing business as Avista Utilities (hereinafter Avista or
3 Company), at 1411 East Mission Avenue, Spokane, Washington, respectfully requests that
4 the Commission approve a pilot program for "Remote Disconnect/Reconnect" and requests
5 that the Commission issue in its order providing the Company with a limited waiver of
6 IDAPA 31.21.01 (311.03) and (311.04) [Utility Customer Relation Rules] for the term of the
7 pilot.

8 The proposed one year pilot is intended to implement a system for remote
9 disconnection and reconnections, without the need for an employee visit to the affected
10 premises. Anticipated benefits include:

- 11 • reducing operating and maintenance expenses related to multiple disconnections and
12 reconnections for urban and rural accounts;
- 13 • productivity gains of employees by eliminating multiple trips to customer homes for
14 collections;
- 15 • enhancing employee safety;
- 16 • quicker response time to reconnect service leading to increased customer
17 satisfaction; and
- 18 • recognizing a reduction in bill defaults and write-offs by encouraging prompt
19 consumer payment over time.

20 The Company requests that this filing be processed under the Commission's Modified
21 Procedure rules.

22 Communications in reference to this Application should be addressed to:

23 David J. Meyer, Esq.
24 Vice President and Chief Counsel for
25 Regulatory and Governmental Affairs
26 Avista Corporation
27 P.O. Box 3727
28 1411 E. Mission Avenue, MSC-13
29 Spokane, WA 99220-3727

Kelly Norwood
Vice President - State and Federal Regulation
Avista Corporation
P.O. Box 3727
1411 E. Mission Avenue, MSC-7
Spokane, WA 99220-3727
Phone: (509) 495-4267

4 **II. BACKGROUND**

5 Avista's current process to disconnect and reconnect an account requires that an
6 employee be dispatched to drive to the customer's premises, disconnect the service and leave
7 a disconnect notice in a conspicuous location. A "disconnect" consists of the removal of the
8 electric meter, installation of insulated boots, and reinstallation of the meter. If there is a
9 safety risk to the employee, the disconnection will occur at the nearest upstream device¹ from
10 the electric meter. Once the account is brought back into good standing, or has been opened
11 by a new customer, an employee is dispatched to drive back to the site to restore the service.

12 Avista continually looks for ways to reduce costs and provide a safe work
13 environment for employees. It is believed that this project will reduce employee field trips to
14 repeated delinquent accounts, enhance employee safety (avoidance of employee risks
15 associated with, e.g., dangerous animals, etc.), allow quicker restoration of service, and
16 ultimately encourage timely customer payment, thereby reducing customer account balances.

17 Avista currently conducts disconnect/reconnect services in compliance with Idaho
18 Utility Customer Relation Rule IDAPA 31.21.01 (300 through 313), which include the
19 following:

20 IDAPA 31.21.01 (311.03) – **Opportunity to Prevent Termination of**
21 **Service** - Immediately preceding termination of service, the employee designated to
22 terminate service shall identify himself or herself to the customer or other responsible
23 adult upon the premises and shall announce the purpose of the employee's presence.
24 This employee shall have in his or her possession the past due account record of the
25 customer and shall request any available verification that the outstanding bills are
26 satisfied or currently in dispute before this Commission. Upon presentation of
27 evidence that outstanding bills are satisfied or currently in dispute before this
28 Commission, service shall not be terminated. The employee shall be authorized to

¹ An upstream device includes equipment such as a fuse or service wire that can be opened or cut to interrupt the circuit and stop the flow of energy.

1 accept full payment, or, at the discretion of the utility, partial payment, and in such
2 case shall not terminate service. Nothing in this rule prevents a utility from
3 proceeding with termination of service if the customer or other responsible adult is
4 not on the premises at the time of termination.

5 **IDAPA 31.21.01 (311.04) – Notice of Procedure for Reconnection Service -**

6 The employee of the utility designated to terminate service shall give to the customer
7 or leave in a conspicuous location at the service address affected a notice showing the
8 time of and grounds for termination, steps to be taken to secure reconnection, and the
9 telephone numbers of utility personnel or other authorized representatives who are
10 available to authorize reconnection.
11

12 In order for this pilot to be effective and achieve the desired results, Avista requests a
13 waiver of rule IDAPA 31.21.01 (311.03) and (311.04) for those accounts included in the pilot
14 program. Specifically, after the disconnect device has been installed, an Avista employee
15 would no longer be required to physically visit the premises to disconnect or reconnect the
16 meter and would not be required to give the customer (or leave in a conspicuous location at
17 the service address affected) a notice showing the time of, and grounds for, termination.
18 However, the Company will let the customer know of the disconnection or reconnection by
19 following its current notification process², but without otherwise sending an employee to the
20 premises. The current process in which the Company does disconnect/reconnect is illustrated
21 in Attachment 1 along with the proposed future process for the pilot. All meters with the
22 device attached will be flagged as part of a pilot program and entered into the Company's
23 customer service system. The Company will continue to be otherwise compliant with rule
24 IDAPA 31.21.01 (311.03) and (311.04) with all customers not included in the pilot who have
25 been disconnected or reconnected.
26
27

² The bill is mailed and due within 15 calendar days, after which the Company allows a 3-day grace period for payments to post. A Past Due Notice is mailed after the grace period ends, dated 7 calendar days later. The Final Notice is mailed 3 business days before the past due notice expires. The Interactive Voice Response System (IVR) then calls the customer on the day the notice expires.

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III. SCOPE OF PROPOSED PILOT PROGRAM

This pilot program will include the installation of approximately 250 remote disconnect collars using Power Line Carrier (PLC) as the communication protocol in the Company’s rural areas and 350 wireless meter devices for use throughout urban areas. PLC is a technology that allows communications across power lines to a disconnect/reconnect switch at the electric meter. This capability allows remote disabling/enabling of the electric service from Avista’s office. The wireless meter device uses telephone paging technology that allows communication to a switch at the electric meter which allows remote disabling/enabling of the electric service. The specifications for disconnect collars and the wireless meter device are included as Attachment 2.

Customers selected for this pilot will include customers with 200 amp services that meet at least one of the following criteria: have had multiple disconnects, are located in rural areas, or otherwise occupy premises where the Avista employee may be “at risk.” Customers selected for this pilot will not be assessed any incremental charges.

IV. MEASUREMENT AND EVALUATION

Measurement & evaluation is integral to defining benefits of a pilot program and identifying areas for improvement or modification. Avista will report the following at the conclusion of the pilot program: 1) numbers of disconnect devices installed, 2) reason for installation, and 3) utilization of the disconnect devices after installation, and (4) costs together with realized savings.


1 **V. REQUEST FOR APPROVAL**

2 Avista respectfully requests approval of a one-year “Remote Disconnect/Reconnect
3 Pilot Program” and requests that the Commission provide the Company with a limited waiver
4 of IDAPA 31.21.01 (311.03) and (311.04) [Utility Customer Relation Rules] for the term of
5 the pilot.

6
7
8 WHEREFORE Applicant respectfully requests the Commission issue its
9 Order authorizing the proposed pilot program, with this application being processed under
10 Modified Procedure.

11
12
13
14 DATED at Spokane, Washington, this 30th day of August, 2007.

15
16 AVISTA CORPORATION

17
18
19 By  _____

20 David J. Meyer

21 Vice President and Chief Counsel for
22 Regulatory and Governmental Affairs

STATE OF WASHINGTON)

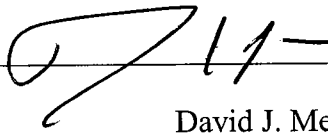
: ss

County of Spokane)

David J. Meyer, being duly sworn, on oath deposes and says:


That he is the Vice President and General Counsel for Regulatory and Governmental Affairs of Avista Corporation;

That he has read the foregoing Application, knows the contents thereof, and believes the same to be true.



David J. Meyer

Subscribed and sworn to before me this 30th day of August, 2007.



Notary Public in and for the State

Washington, residing in Spokane

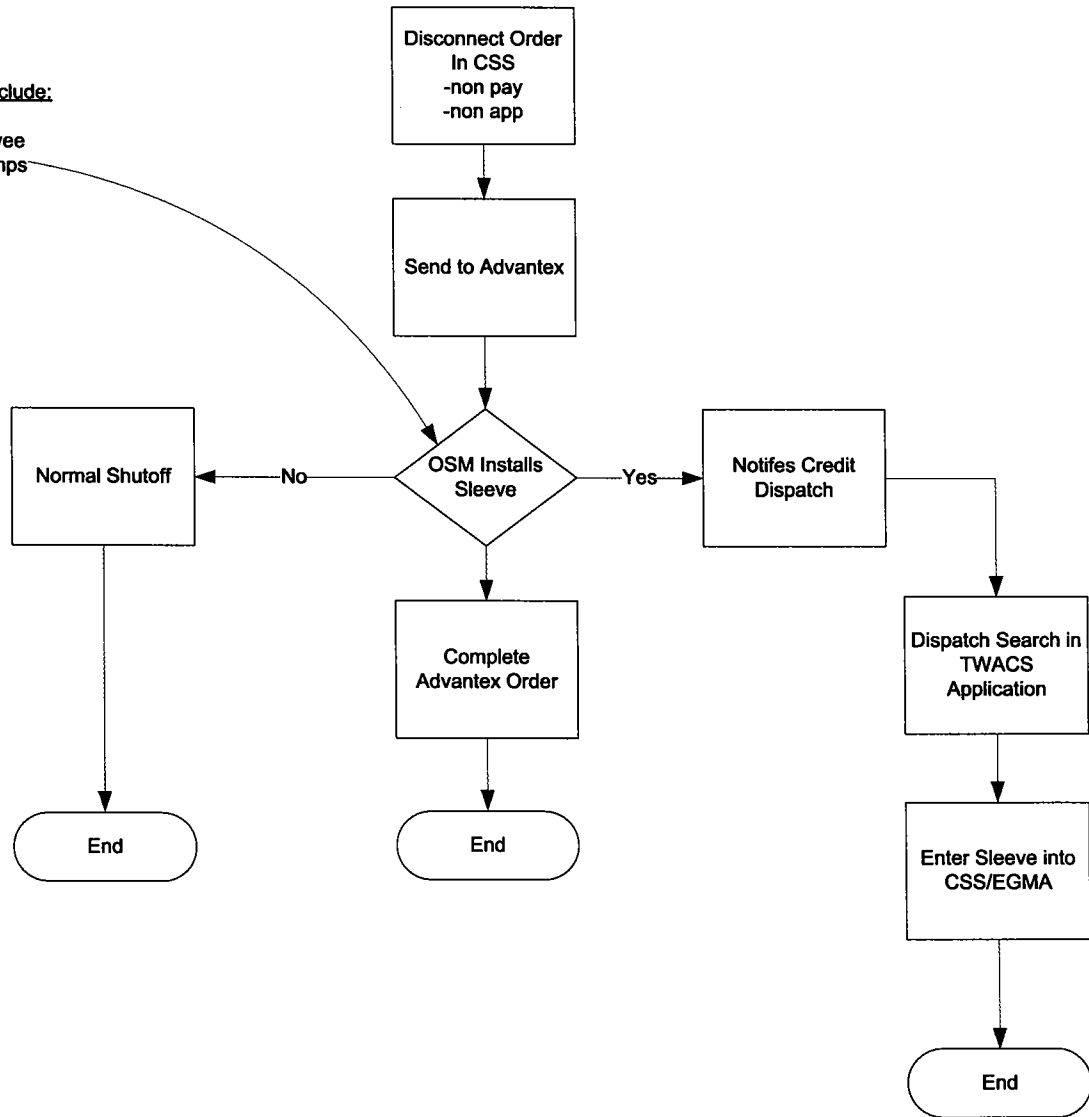


Application of Avista Corporation
Case No. AVU-E-07-09

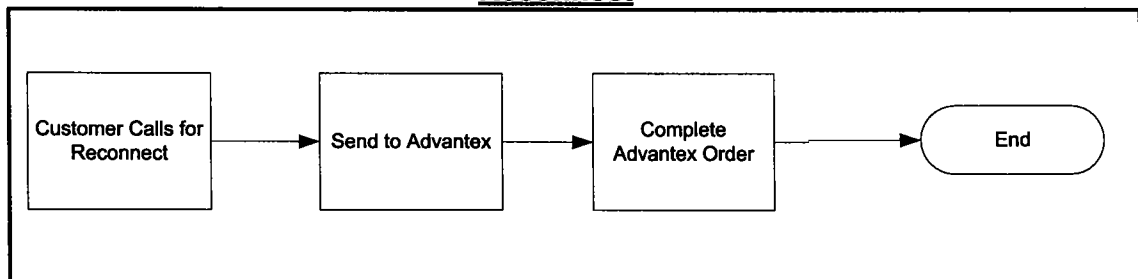
ATTACHMENT 1

Current Disconnect/Reconnect Processes

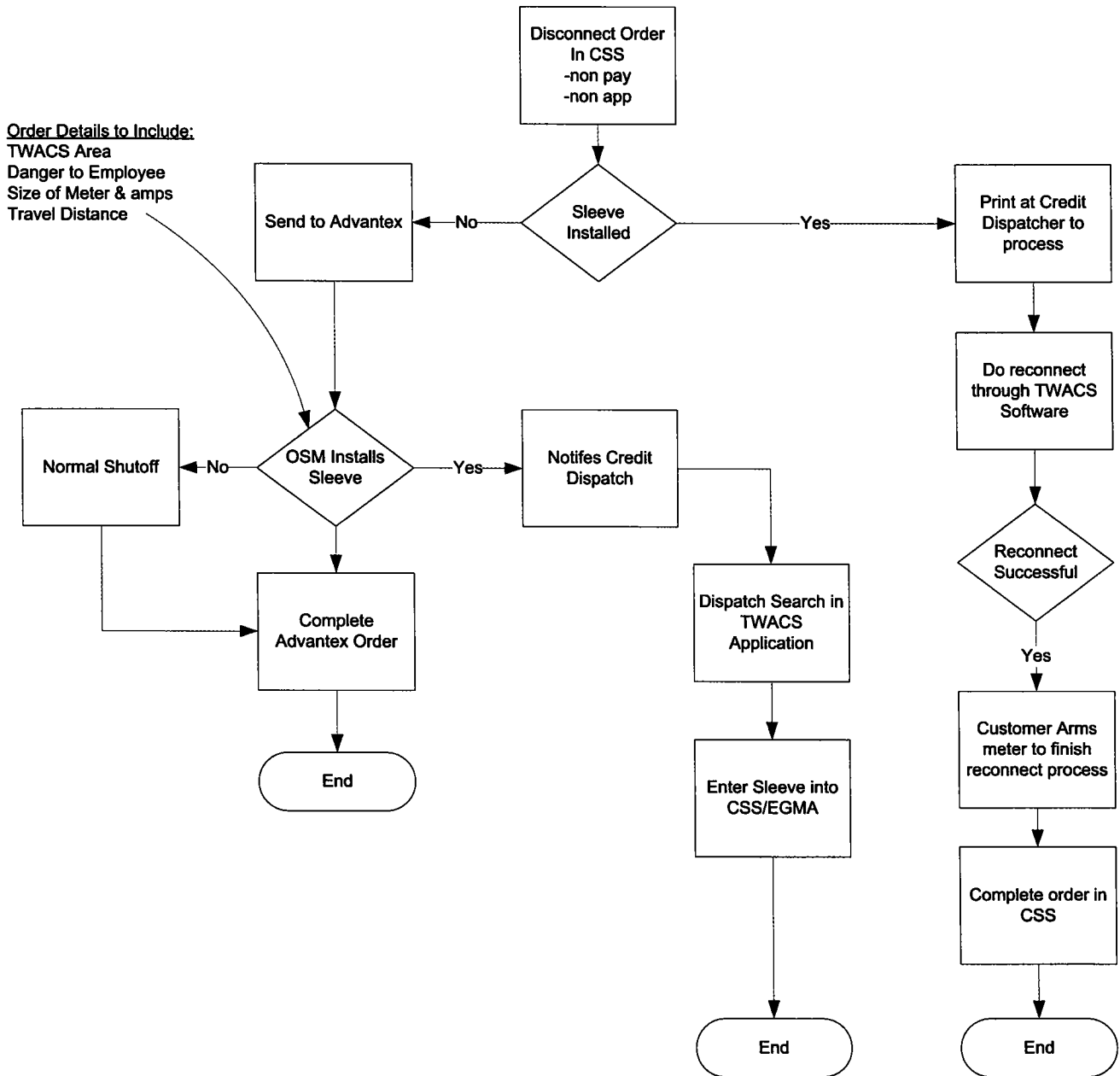
Order Details to Include:
TWACS Area
Danger To Employee
Size of Meter & amps
Travel Distance



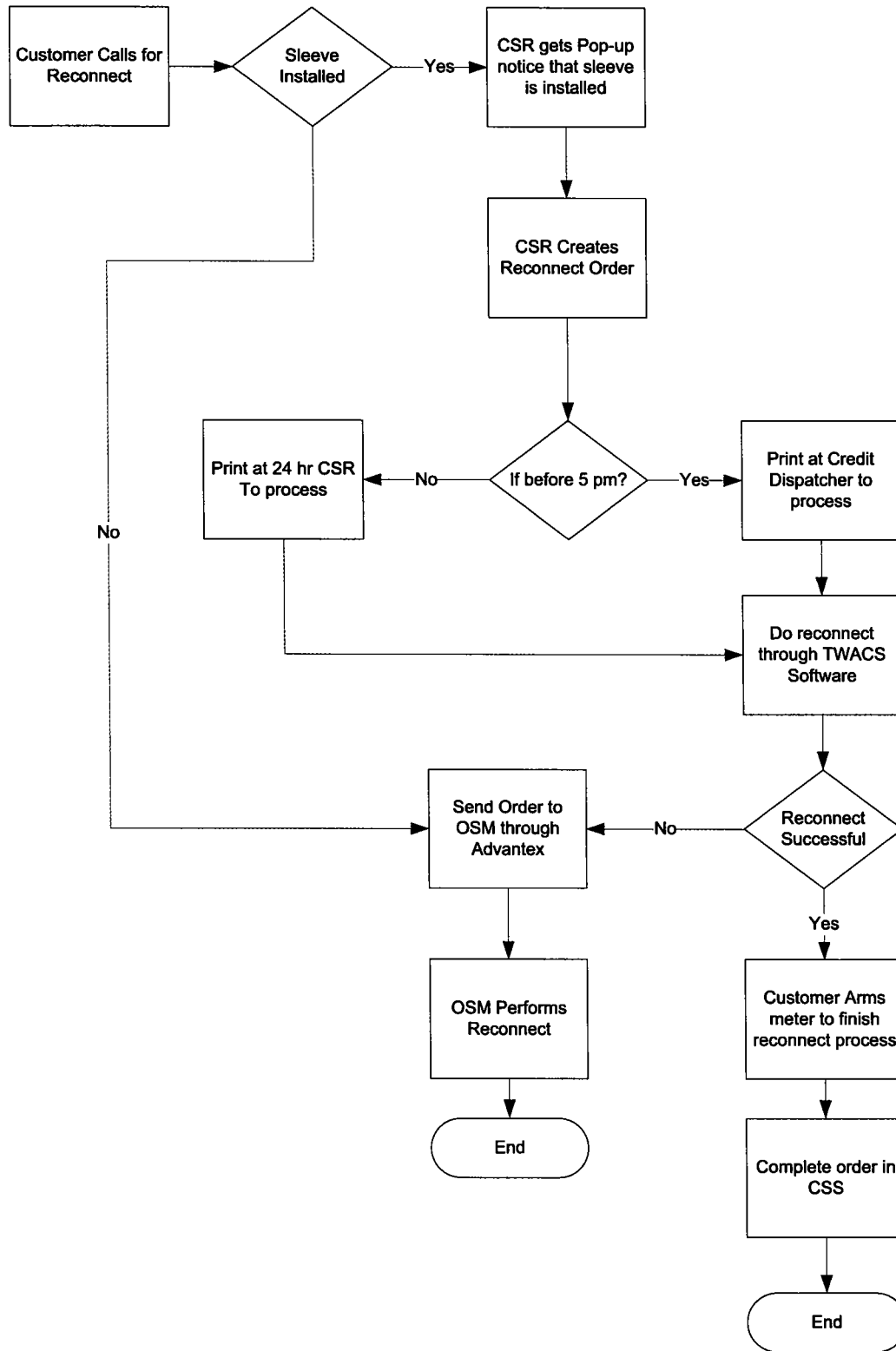
Reconnect



Disconnect Process Under Pilot Program



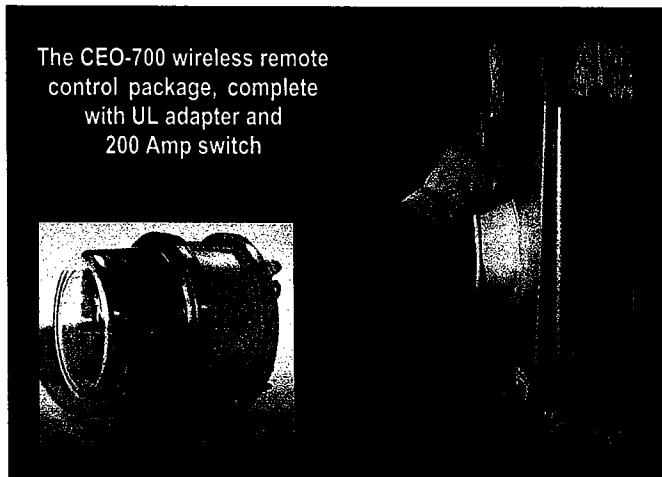
Disconnect Process Under Pilot Program



ATTACHMENT 2

CEO700

Whole House Disconnect/Reconnect



The CEO-700 wireless remote control package, complete with UL adapter and 200 Amp switch

The CEO700 is a complete integrated wireless remote whole house disconnect package complete with meter adapter, 200 amp switch, and Nighthawk control board. Installation is lightning fast requiring only the removal of the existing meter, plug in of the CEO700, and replacement of the meter into the CEO700. Upon installation the utility command center can then page the switch "on" or "off". It is literally that simple. An optional homeowner reset switch is available that would require the homeowner to push an easy to see button on the meter housing before the switch would actually close.

The CEO700 can be programmed to work on any public or private paging network. The devices can be activated by any touch tone phone or by computer modem using our user-friendly software. The CEO700 is ideal for seasonal use buildings, student apartment complexes, chronic no pays, and remote safety disconnect.

Installation is fast, requiring only the removal of the existing meter, plug in of the CEO700 and replacement of the meter into the CEO700 (the remote control functions are active immediately upon installation). The slim, low profile, integrated circuit board fits snugly between the meter back and the 200 Amp disconnect switch allowing for use of a low profile UL adapter.

Features

- Available in UHF, VHF and 900 MHz Frequencies
- Low profile, 2.75 inch offset, ring or ring-less sockets
- 4 and 5 Jaw Model
- Multi-Level security codes
- Optional Homeowner reset button
- LOW COST - Control functions are located on a single circuit board designed for mass production
- Long term availability and short production lead times

Specifications

Frequencies:	UHF, VHF, 900Mhz
Electrical Switching Capacity:	200 Amps
Paging Format:	POCSAG 512, 1200, 2400 Baud
Operating Temperature:	-20° C to +70° C

Paging Airtime

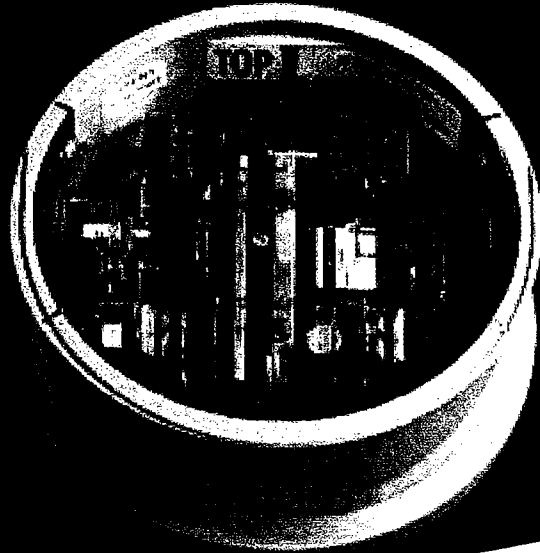
The CEO700 can be shipped to you completely pre-programmed to paging signals in your region. Paging can be provided through Nighthawk Systems, Inc. at very low monthly rates.

If you currently have paging service preference, the CEO700 can be programmed to accommodate your private or public paging service in all UHF, VHF, and 900 MHz frequencies.

About the Company

Now in its second decade, Nighthawk Systems, Inc., designs and manufactures easy to use "Plug and Play" paging products that remotely control virtually any electrical device, from any location. Our products are designed to be easily installed and operated.

TWACS® Disconnect Switch Interbase



(DSI)

The Disconnect Switch Interbase (DSI) from TWACS® offers a stand-alone, two-way, addressable disconnect switch which provides tamper detection capabilities and paves the way for pre-pay services.

The DSI combines the functionality of a 200 Amp latched relay with the

convenience of the superior TWACS two-way power line communications system.

Stand-alone Design

The stand-alone design offers a plug-in, self-contained solution, which requires no additional connections and is independent of the meter type or technology. All that is required is installation on a TWACS-enabled distribution system.

Whole House Disconnect

Now you can provide for remote whole house disconnect and reconnect with the DSI. The DSI utilizes a dependable and reliable 200 Amp latched relay and combines it with the powerful TWACS system. This combination permits the Customer Service Representative (CSR) to disconnect and reconnect individually metered residential or small commercial, single-phase 200 Amp services remotely from the utility office. The DSI disconnects the electric service to the home while leaving the meter powered for monitoring or communication purposes.

Remote Control - - From Utility Office

No longer is it necessary to create a work order and dispatch a meter technician to remove or "boot" a meter. The CSR or TWACS system operator can simply issue the command for an immediate or scheduled disconnection. Reconnection is equally easy. Each DSI is uniquely addressable based on a secure, factory assigned identity for the highest integrity. Remote communication is provided via the TWACS system which links the utility control center and the meter site. Rapid confirmation of service disconnect or reconnect can be obtained within 20 seconds of command initiation.

Universal Design

The DSI's universal design fits most residential applications. Compatibility is assured with 200 Amp 4-jaw form 2S and 5-jaw form 12S/25S residential sockets. The DSI works with meters both old and new, electromechanical and electronic. The DSI consists of an interbase collar, a 200 Amp latched relay and a TWACS

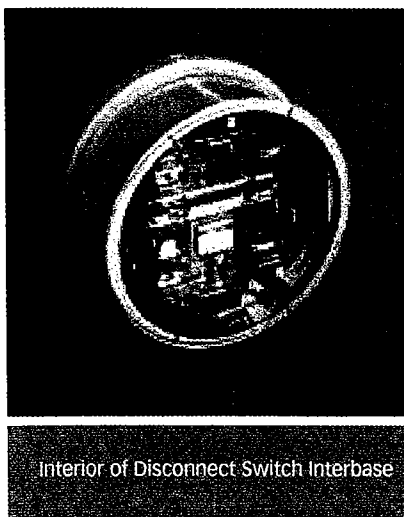
communication module with an electronic switch controller. The collar has four (or five) jaws that accept the blades from the meter on the topside and four (or five) blades that insert into a standard meter socket on the bottom side.

Utility and Consumer Benefits

Utilities utilizing this product will have at their disposal a powerful revenue collection tool for problem accounts, as well as the ability to enhance customer service by providing a convenience for seasonal and rental customers. Additionally, this improves utility efficiency and personnel safety by allowing connects and disconnects to be performed from the convenience of the utility office. The two-way addressable DSI also paves the way for future pre-pay metering implementations.

Tamper Detection

Tamper Detection is provided through the use of a periodic two-way communications check, load side detector, and diagnostic register. Two-way



Interior of Disconnect Switch Interbase



TWACS® Disconnect Switch Interbase (DSI)

communications confirm that the DSI has not been removed. Load side detection verifies proper operation and will indicate a bypass condition. The diagnostic register generates an alarm flag that is sent to the utility office if tamper is detected.

Switch Status LED and Connect Push-Button

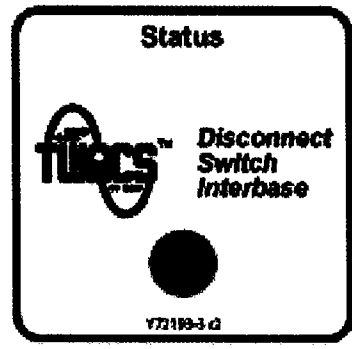
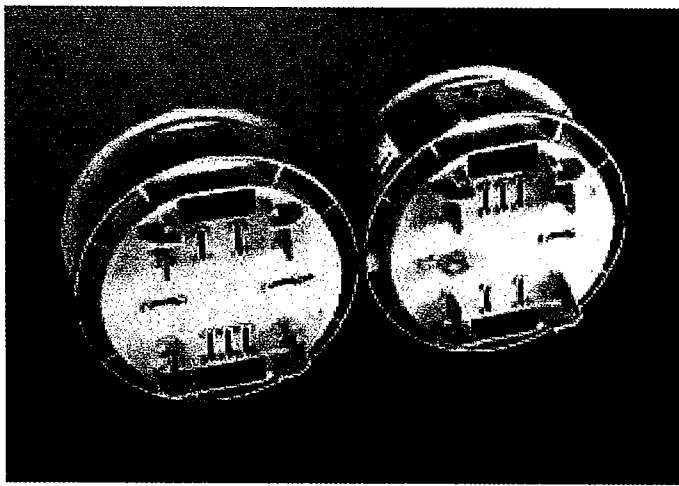
The DSI offers two options to close the switch: a) a direct software command from DCSI's master station software, or b) a two-step process that

allows the consumer to make sure their home is ready for connection. First a software command is issued to arm the switch followed by the consumer manually depressing the "On" Push-Button.

Low Profile

The Low Profile design enhances the universal fit and minimizes any change of appearance to the consumer's service.

Functional Specifications	Value or Range
Line Voltage	208, 240 VAC +/-15%
Frequency	60 Hz +/-5%
Temperature Range	
With Solar Load	-40°C to +53°C
Without Solar Load	-40°C to +60°C
Storage Temperature	-40°C to +85°C (18 months max.)
Humidity	0% to 95%, non-condensing
Switch Operations	
Rated Current	200 Amps
Short Circuit Closing Withstand	10,000 Amps per UL 1008 - 1999
Short Circuit Withstand Overload	10,000 Amps per UL 508 - 1999
Peak Overload	12,000 Amps per ANSI C12.1 - 1995
6 Cycles at 7000 Amps per ANSI C12.1, 1995	
Temperature Rise	UL 508, 1999 and UL 414
Dielectric	1500 volts at 60Hz for 1 minute per UL 508
Creepage and Clearance	UL 508 - 1999
Switch Endurance	30,000 Mechanical Operations 5,000 Full Load Electrical Operations
Standards Compliance	
EMI/RFI Susceptibility	ANSI C12.1 Test No.26
AC Line Surge	ANSI/IEEE C62.41-1991 per ANSI C12.1-2001 Test No.17
Electrical Fast Transient	IEC 61000 PT4 per ANSI C12.1-2001 Test No.25
EMI/RFI Emissions	CFR 47 Part 15, Subparts A&B per ANSI C12.1-2001 Test No.27
Meter Forms	Class 200 2S, 12S, 25S



The use of the Disconnect Switch Interbase "DSI" permitting remote disconnect/connect may be subject to certain laws, regulations, and/or tariffs at the federal, state and/or local level. Prior to utilizing such a feature, the user is responsible for compliance with all such laws, regulations and/or tariffs. DCSI is held harmless in case of violation of laws, regulations, and tariffs due to the use of the Disconnect Switch Interbase feature of the product.