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IDAHO PUBLIC
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July 10, 2008

Jean Jewell
Secretary, Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

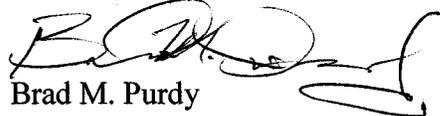
Re: Case No. AVU-E-07-09 – Remote meter pilot program

Dear Ms. Jewell:

Enclosed, please find an original, and seven copies, of ^{CAPAIS} ~~the Energy Project's~~ Petition for
Intervenor Funding in the above-referenced case.

Thank you for your assistance in this matter.

Sincerely,


Brad M. Purdy

cc: All parties

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 Attorney for Petitioner
 Community Action Partnership
 Association of Idaho

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 IDAHO PUBLIC
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. AVU-E-07-09
OF AVISTA CORPORATION FOR)	
AUTHORITY TO IMPLEMENT A PILOT)	COMMUNITY ACTION
PROGRAM FOR REMOTE DISCONNECTS)	PARTNERSHIP ASSOCIA-
AND RECONNECTS)	TION OF IDAHO'S
)	PETITION FOR INTER-
)	VENOR FUNDING
_____)	

COMES NOW, Petitioner Community Action Partnership Association of Idaho (CAPAI) and, pursuant to Idaho Code § 61-617A and Rules 161-165 of the Commission's Rules of Procedure, IDAPA 31.01.01, petitions this Commission for an award of intervenor funding.

Rule 161 Requirements

AVISTA is an electric/gas regulated, public utility with gross Idaho intrastate, annual revenues exceeding three million, five hundred thousand dollars (\$3,500,000.00).

(01) Itemized list of Expenses

Consistent with Rule 162(01) of the Commission's Rules of Procedure, an itemized list of all expenses incurred by CAPAI in this proceeding is attached hereto as Exhibit "A."

(02) Statement of Proposed Findings

CAPAI's proposed findings and modifications to AVISTA's original application seeking approval of a remote metering pilot program, filed in this case on August 31, 2007, are set forth in CAPAI's Final Comments to AVISTA's Revised Application filed on May 5, 2008, pursuant to the Commission's Order No. 30471 issued December 4, 2007. Due to the somewhat unique procedural nature of this case, CAPAI submits the following brief history which incorporates CAPAI's proposed findings and recommendations.

In its original Application, AVISTA requested modified procedure. On September 19, 2007, the Commission issued a Notice of Application and Order No. 30437, approving the use of modified procedure absent objection by any interested person.

On October 25, 2007, CAPAI submitted comments opposing the use of modified procedure for a variety of reasons. Instead, CAPAI proposed that the Commission conduct a full technical hearing. In the alternative, CAPAI suggested that the Commission order a workshop to include any interested person to discuss concerns CAPAI expressed about the proposed changes to Company policy and fees regarding the installation of remote metering and disconnection and reconnection of service. CAPAI contended that the application likely provided benefits to shareholders of the Company without commensurate benefits or at least consideration of the effects on certain

customers, particularly. CAPAI noted that the use of remote meters, without ameliorating measures, would increase the number of disconnections and would eliminate the “health and safety” benefits that a personal visit to the customer’s premises prior to disconnection provided. Finally, CAPAI questioned whether the notice provided by the Company prior to installation of the remote meters was adequate and how the costs of the program would be recovered and the effect it would have on ratepayers. CAPAI argued that the pilot program, as proposed, would result in unduly onerous treatment of rural and low-income customers.

During this time period, AARP also submitted comments opposing the use of modified procedure and expressing similar concerns regarding the effect the program would have on all customers. AARP also participated fully in all phases of the case and provided valuable insight on all issues. The Commission Staff generally supported the Company’s proposal but expressed concerns primarily regarding the proposed noticing of the remote metering program.

On December 4, 2007, the Commission issued Order No. 30471 agreeing that the “details of the pilot program need further development and refinement.” Order 30471 at p. 8. Consequently, on January 7, 2008, the Commission issued a Notice scheduling two workshops in north Idaho and directed that following the second workshop, AVISTA submit a supplement to its Application “incorporating the parties’ input, refinements, recommendations, and any consensus from the workshops.” Id. at p. 9.

Upon receipt of the Commission’s Notice, CAPAI suggested that, rather than conducting workshops during the inclement weather months, and due to the technical nature of the Application, that a single workshop and negotiations between the parties be

conducted. As a result, the Commission issued a Notice on January 25, 2008 vacating the north Idaho workshops and, on March 12, 2008, noticed a single workshop to be conducted later that month. The Commission also identified a number of issues to be addressed by the Company based on preliminary input by CAPAI and the other parties.

Armed with the Commission's directive, the parties set about negotiating the various concerns expressed by CAPAI, AARP, and Staff. These negotiations initially took place through telephone conferences and in writing and culminated in the workshop scheduled by the Commission in March. The negotiations continued through the time period allotted by the Commission for AVISTA to submit its supplemented application.

As a result of the thoughtful and extensive input by CAPAI and the other parties, and the commendable compromise by AVISTA, a final agreement was reached on the majority of issues raised. A face to face workshop was conducted involving representatives of AVISTA, CAPAI, AARP and the Commission Staff. This workshop was preceded and followed by numerous telephone conferences and written correspondence between the parties. These negotiations were extensive and exhaustive of all significant issues raised by the Company's proposed Pilot Program. The negotiations included the concerns expressed by CAPAI in its original comments, as well as other issues that were identified as negotiations proceeded.

On April 28, 2008, AVISTA filed a Revised Application incorporating the agreed upon modifications to the original proposal. Those modifications, proposed and/or supported by CAPAI, include:

1. The "selection criteria" used to identify participants in the program include 1) where safety concerns for Company personnel were an issue or, 2) where there

were two or more field visits or disconnections in the previous twelve months. AVISTA agreed to exclude from the program customers receiving benefits under the Company's "CARES" program. These criteria constitute a substantial departure from the criteria originally proposed.

2. AVISTA agreed to not discriminate against rural customers regarding their inclusion in the program.

3. The Company agreed to reduce the disconnect/reconnect fee by 50% to offset the loss of health and safety benefit that might result from the lack of an actual on-site physical disconnection by an AVISTA employee.

4. Though there remain issues hanging involving notification requirements for installation of a meter, the Company has made some modifications to its original proposal based on input from the parties.

5. Again, though the precise details have not been completely resolved between the parties, AVISTA has agreed to modify the manner in which it will analyze and evaluate the program, particularly concerning the cost-effectiveness and any deleterious effect the program might have on low-income customers.

(03) Statement Showing Costs

CAPAI submits that the costs and fees incurred in this case, and set forth in Exhibit "A," are reasonable in amount. It is fair to characterize this case as somewhat unique in that, while it was handled under modified procedure, it took on a fairly complex nature and protracted procedural path. There were considerable negotiations conducted, a settlement workshop, numerous comments, analyses of technical issues, and the formulation of an important program never before implemented in Idaho.

Due to the extensive negotiations between the parties and the considerable time and effort expended, considerable modifications were made to the program as originally proposed. Considering the extent of the work involved, as detailed above, CAPAI submits that the amount of time expended and costs incurred were reasonable in light of the outcome achieved, the fact that the program has been refined and improved, and that all ratepayers have benefited from the aforementioned efforts.

(04) Explanation of Cost Statement

CAPAI is a non-profit corporation overseeing a number of agencies who fight the causes and conditions of poverty throughout Idaho. CAPAI's funding for any given effort might come from a different variety of sources, including governmental. Many of those funding sources, however, are unpredictable. Some contain conditions or limitations on the scope and nature of work eligible for funding. The cost to CAPAI of participating in this proceeding constitutes a significant financial hardship.

The Company's proposed remote metering pilot program is a matter of first impression for the Commission and presents issues of tremendous importance for all ratepayers, particularly low-income. Had CAPAI not participated in this proceeding, it is likely that those interests would not have been fully and adequately represented. This necessitated incurring the costs sought by this Petition. Without assistance through the intervenor funding statutes and rules, CAPAI would be much more limited not only in the extent to which it participates in any given case, but whether it participates at all due to budget constraints. Intervenor funding helps to assure that issues of importance do not go unaddressed due to CAPAI's lack of financial resources.

(05) Statement of Difference

As indicated above, there were numerous issues raised and negotiated in this case. Though both CAPAI and Staff weighed in on the issue of adequate notification and evaluation, Staff largely supported the program as originally proposed. Thus, CAPAI took a materially different position than Commission Staff in addressing numerous other issues that Staff did not address.

(06) Statement of Recommendation

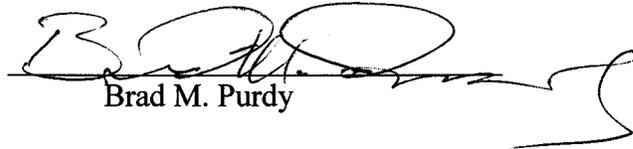
CAPAI's Statement of Recommendation previously stated in this Petition. In addition, while CAPAI's primary mandate and focus is to represent the interest of low-income individuals, it is safe to say that CAPAI's framing of the issues and advocacy was in the general interest of all ratepayers. For example, if, as CAPAI asserts, the Company's pilot program as originally proposed resulted in a significant increase in the number of disconnections without ameliorating conditions, this would have the effect of driving up AVISTA's costs of operation thereby increasing rates for other customers.

Furthermore, while the program might be designed for customers who have been disconnected more than others, it can fairly be stated that many customers are in jeopardy of being included in the program given that the bar is relatively low; two disconnections in one year. In our current times of economic downturn, many more customers have been pushed to the margin. Still others might end up being included in the program simply because of neglect in paying their bills, due to illness or unexpected absence, etc. In short, this program can and likely will affect many of AVISTA's customers who otherwise would not be characterized as "low-income."

(07) Statement Showing Class of Customer

To the extent that CAPAI represented a specific AVIST customer class, it is the residential class.

RESPECTFULLY SUBMITTED, this 14th day of July, 2008.



Brad M. Purdy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of July, 2008, I caused to be served the foregoing Petition for Intervenor funding on the parties listed below by U.S. mail, postage prepaid.

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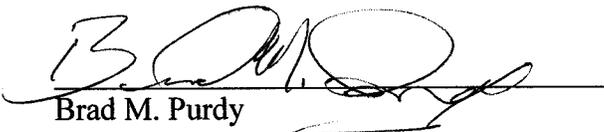

Brad M. Purdy

EXHIBIT "A"
ITEMIZED EXPENSES

Costs:

Photocopies	\$0
Telephone conferencing costs	\$0
Postage	<u>\$0</u>
Total Costs	\$0

Fees:

Legal	(Brad M. Purdy 28.00 hours @ \$120.00/hr)	\$3,360
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Total Fees		\$3,360
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Total Expenses		\$3,360
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