

BARTON L. KLINE ISB #1526  
MONICA MOEN ISB #5734  
Idaho Power Company  
P. O. Box 70  
Boise, Idaho 83707  
Telephone: (208) 388-2682  
FAX Telephone: (208) 388-6936

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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for Idaho Power Company

Street Address for Express Mail:

1221 West Idaho Street  
Boise, Idaho 83702

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE	)	CASE NO. IPC-E-02-12
INVESTIGATION OF TIME-OF-USE	)	
PRICING FOR IDAHO POWER	)	IDAHO POWER COMPANY'S
RESIDENTIAL CUSTOMERS.	)	PETITION FOR STAY
	)	
_____	)	

Idaho Power Company (hereinafter referred to as "Idaho Power" or "the Company"), Petitioner herein, pursuant to RP 324, respectfully petitions the Commission to issue its Order staying the requirement in Order No. 29196 that by March 20, 2003, Idaho Power Company submit a plan to replace all of its existing retail revenue meters with an automated meter reading (AMR) system by the end of 2004.

This Petition is based on the following:

1. Confirmation by the Commission that Order No. 29196 is a final order as set forth in the Company's Petition For Confirmation filed concurrently with this Petition For Stay.

2. In Order No. 29196 dated February 21, 2003, the Commission ordered Idaho Power to immediately begin replacing the Company's existing revenue metering equipment with an automated meter reading system with the replacement process to be completed by the end of 2004. In Order No. 29196, the Commission also ordered "that no later than March 20, 2003, Idaho Power Company submit a plan to replace the current meters of Idaho Power customers with advanced meters as described in detail above."

3. Because there were no hearings conducted in this case, Idaho Power has been unable to express its concerns relating to the replacement of the Company's existing revenue metering equipment and the installation of an AMR system. Idaho Power has outlined those concerns in the Petition For Reconsideration which the Company has filed concurrently with this Request For Stay. The Petition For Reconsideration identifies numerous separate issues relating to the deployment of AMR that Idaho Power believes the Commission should address in a formal hearing. Conducting a hearing will give all parties an opportunity to present facts and evidence on the record for consideration by the Commission.

4. Preparing the plan required by Order No. 29196 to replace the Company's existing metering equipment with an AMR system will require the expenditure of substantial time, effort and resources. In addition, many of the issues the Company has identified in its Petition For Reconsideration are issues that, by

necessity, will be addressed in any implementation plan prepared by Idaho Power. Recognizing that the Commission initially has 28 days within which to decide whether or not it will grant reconsideration, and up to 17 weeks to issue an order on reconsideration, it is clear that, unless the Commission suspends Idaho Power's obligation to file an implementation plan by March 20, 2003, Idaho Power could be required to file the plan to implement an AMR system before the Commission issues a final order in this proceeding. Idaho Power requests an opportunity to address its concerns with the AMR deployment described in Order No. 29196 prior to being required to present any implementation plan. In short, the Company is urging the Commission to stay its order pending reconsideration before the Company expends the substantial time, effort and resources required to prepare the AMR implementation plan required by Order No. 29196.

5. Idaho Power hereby requests that the Commission consider this Petition For Stay on an expedited basis pursuant to RP 256 and issue its order suspending Idaho Power's obligation to file an AMR implementation plan by March 20, 2003, so that Idaho Power can avoid expending the substantial effort required to develop a plan to implement the AMR system prior to the time that a full review of the issues relating to an AMR system can take place in a hearing before the Commission.

6. Counsel for Idaho Power Company has personally contacted Ms. Nordstrom of the IPUC Staff, Mr. Eddie of Advocates for the West, and Mr. Delurey from DRAM and advised them that the Company had filed this Petition and is requesting an expedited order.

Respectfully submitted this 12th day of March 2003.

A handwritten signature in cursive script, appearing to read "B L Kline", written above a horizontal line.

BARTON L. KLINE  
Attorney for Idaho Power Company

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of March, 2003, I served a true and correct copy of the within and foregoing IDAHO POWER COMPANY'S PETITION FOR STAY upon the following named parties by the method indicated below, and addressed to the following:

Lisa Nordstrom	<u>  x  </u>	Hand Delivered
Deputy Attorney General	<u>      </u>	U.S. Mail
Idaho Public Utilities Commission	<u>      </u>	Overnight Mail
472 W. Washington Street	<u>      </u>	FAX
P.O. Box 83720		
Boise, Idaho 83720-0074		

William M. Eddie	<u>      </u>	Hand Delivered
Land & Water Fund of the Rockies	<u>  x  </u>	U.S. Mail
P.O. Box 1612	<u>      </u>	Overnight Mail
Boise, Idaho 83701	<u>  x  </u>	FAX

Dan Delurey, Executive Director	<u>      </u>	Hand Delivered
Demand Response and Advanced	<u>  x  </u>	U.S. Mail
Metering Coalition (DRAM)	<u>      </u>	Overnight Mail
P.O. Box 33957	<u>      </u>	FAX
Washington, D.C. 20033		



BARTON L. KLINE