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IDAHO PUBLIC UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF IDAHO POWER COMPANY FOR)
AUTHORITY TO INCREASE ITS INTERIM)
AND BASE RATES AND CHARGES FOR)
ELECTRIC SERVICE.)
_____)

CASE NO. IPC-E-03-13

IDAHO POWER COMPANY

DIRECT REBUTTAL TESTIMONY

OF

SUSAN J. FULLEN

1 Q. Please state your name and business address.

2 A. My name is Susan J. Fullen and my business
3 address is 1221 West Idaho Street, Boise, Idaho 83704.

4 Q. Are you the same Susan J. Fullen who has
5 previously presented direct testimony in this case?

6 A. Yes, I am.

7 Q. What is the scope of your rebuttal testimony?

8 A. My testimony will focus on issues raised by
9 Commission Staff relating to customer service and by the
10 Community Action Partnership Association of Idaho relating
11 to the Company's Low Income Weatherization Assistance
12 Program.

13 Q. Are you sponsoring any exhibits with your
14 direct rebuttal testimony?

15 A. Yes. I am sponsoring Exhibit No. 78.

16 Staffing

17 Q. In her direct testimony, Staff Witness Ms.
18 Parker discussed her concern regarding the ability of the
19 Company's customer service staff to handle the expected
20 increase in customer phone calls with the adoption of
21 seasonal rates. While she commented that the Company has
22 modified its staffing since tiered rates were in effect, can
23 you describe how the Company is prepared to handle
24 additional, sporadic call volume fluctuations?

25 A. The Company has made staffing modifications

1 to the Customer Service Center since the 2001 tiered-rates
2 time frame Ms. Parker discussed. As noted by Staff, the
3 Company now has more part-time employees. In addition, the
4 Customer Service Center has developed a contingency plan to
5 handle increased call volumes. The contingency plan
6 includes the ability to make staffing adjustments by
7 shortening lunch hours and extending work hours for both
8 shift and part-time employees. These adjustments are
9 outlined in a detailed deployment plan based on critical
10 call volume criteria. I am confident this plan will allow
11 the Company to manage any increase in calls resulting from
12 the implementation of seasonal rates.

13 Prorated Bills

14 Q. Is the Company taking any steps to address
15 the issue of bill presentation for prorated bills to help
16 alleviate customer confusion?

17 A. The Company acknowledges that prorated bills
18 have caused customer confusion. In an attempt to make the
19 bill presentation less confusing to customers, the Company
20 is investigating a number of options. Because of the time
21 needed to fully investigate and test these options, the
22 Company cannot detail a specific modification at this time.
23 However, the Company is committed to finding a solution to
24 make prorated bills less confusing for customers.

25

1 Customer Relations

2 Q. Staff points out that two significant
3 functions that are not available through the Company's web
4 site are customer requests to connect and disconnect
5 service. Does the Company have plans to incorporate these
6 types of customer requests in the capability of its web
7 site?

8 A. Yes. The Company is currently developing
9 additional customer services through our web site.

10 Q. Staff recommends the Company add a sentence
11 in Spanish on bills and disconnect notices to inform Spanish
12 speakers that if help is needed in understanding what the
13 notice or statement says, he or she may call the Company for
14 assistance. Does the Company agree with Staff's
15 recommendation and if so, what steps have been taken to
16 accommodate this recommendation?

17 A. The Company agrees with Staff's
18 recommendation. After consulting with the Company's local
19 multilingual translator, the Company has initiated the
20 addition of Spanish text near our telephone numbers in the
21 heading of our bills and notices. The Company anticipates
22 completing this change before April 1, 2004. Exhibit No. 78
23 is a sample bill showing the additional text.

24 Q. Staff recommends adding an "on-hold" message
25 in Spanish informing customers that a Spanish-speaking

1 representative is available. Does the Company agree with
2 this recommendation?

3 A. The Company agrees that providing Spanish-
4 speaking assistance to Spanish-speaking customers is
5 important. As Staff points out, the Company always has at
6 least one Spanish-speaking representative available on any
7 given shift. If this representative is assisting another
8 customer at the time Spanish assistance is needed, the
9 Company utilizes its third-party interpretation service to
10 assist the customer. The Company recently installed an
11 upgraded voice activated response unit to enhance customer
12 interactions. We are currently working with the Power
13 Assistance Line (PAL) vendor to implement the Spanish assist
14 option that is available through this system. This option
15 will allow customers to select Spanish-speaking assistance
16 through the initial menu offering. Because this option will
17 provide front-line service to customers, I do not believe
18 that an "on-hold" message is necessary.

19 Q. Does the Company agree with Staff's
20 recommendation to evaluate the need for bills and delinquent
21 notices to be printed in Spanish?

22 A. Yes, the Company will continue to monitor
23 customer requests for Spanish and other language assistance.
24 Presently, the Company has not had such requests from
25 customers or agencies. The Company will explore the

1 opportunity to work with other groups to enhance our
2 services.

3 Out-of-Cycle Meter Readings

4 Q. Staff expressed concern regarding the
5 Company's presentment of out-of-cycle meter reading dates on
6 customer bills. Specifically, Staff recommended that the
7 meter reading date for an out-of-cycle meter reading should
8 reflect the date the meter was actually read not the date
9 the customer requested the service. What steps are being
10 taken to address this issue.

11 A. The Company has thoroughly assessed the
12 process involved in the reported meter read date represented
13 on the customer's bill. As a result of this assessment, the
14 Company will modify its process so that the actual date the
15 final meter reading was taken or service was disconnected,
16 not the date the customer requested the service, will be
17 recorded in the Company's Customer Information System and
18 will be printed on the customer's bill. This process change
19 will also result in the service starting date printed on the
20 customer's bill corresponding to the actual date the service
21 connection or meter reading took place. Changes to the
22 Company's out-of-cycle meter reading process are targeted
23 for completion by June 1, 2004.

24 Non-compliance

25 Q. In her direct testimony Ms. Parker stated the

1 Company is out of compliance with UCRR 401, 402, and 403.
2 Do you agree with this assertion and if so, what action is
3 being taken to comply?

4 A. The Company concurs it is not in compliance
5 with UCRR 403. However, the Company respectfully suggests
6 that it meets the requirements of UCRR 401 and 402. UCRR
7 401 provides customers the right to complain or request a
8 conference, that the Company will promptly investigate the
9 complaint, and that the applicant or customer's service will
10 not be terminated during an investigation. The Company
11 adheres to this rule as can be demonstrated through the
12 customer contact notes within the Customer Information
13 System and through correspondence with the consumer staff at
14 the Commission.

15 UCRR 402 provides customers and applicants the
16 definition of Commission authority over complaints. The
17 Company's partial non-compliance with UCRR 403 does not
18 impact UCRR 402 as this rule establishes the Commission
19 authority and procedures.

20 With regard to UCRR 403, Record of Complaints, the
21 Company agrees it is not in full compliance. While the
22 Company does maintain records of all complaints submitted
23 through the Commission, it has not been fully tracking
24 complaints received by the Company which do not involve
25 Commission Staff. The Company has taken steps to improve

1 monthly reporting and categorization of customer contacts
2 entered as a "complaint" type. Additional training will be
3 conducted to improve awareness of the complaint procedure
4 and the review, recordkeeping and reporting aspects of the
5 process.

6 A Company-wide study is underway to determine the
7 best method for collecting complaints that reach the Company
8 through various departments outside the Customer Service
9 area. The Company expects to have a plan to address the
10 collection of these complaints by May 1, 2004.

11 Q. Staff also found the Company to be out of
12 compliance with UCRR 701. Please detail steps taken to
13 provide customers with a Summary of Utility Customer
14 Relations Rules (UCRR 701).

15 A. A Summary of Utility Customer Relation Rules
16 has been distributed to residential customers annually for
17 several years. The Company has developed two new consumer
18 information brochures for irrigation, commercial, and
19 industrial customers that provide a summary of the Utility
20 Customer Relation Rules. A brochure was mailed to all
21 existing irrigation, commercial, and industrial customers
22 with their February billing. The brochures contain a
23 Spanish sentence indicating the brochure information is
24 available in Spanish.

25 In addition, a process was implemented in March 2004

1 that provides brochures to all new customers in accordance
2 with UCRR 701.

3 Low Income Weatherization Assistance Program

4 Q. In his direct testimony on behalf of the
5 Community Action Partnership Association of Idaho (CAPAI),
6 Mr. Robinette proposes design changes to the Company's Low
7 Income Weatherization Assistance (LIWA) program.
8 Specifically, Mr. Robinette proposes changes to the current
9 50 percent funding, the administrative fee paid through LIWA
10 to the participating agencies, and the total funding for the
11 LIWA program. In addition, Mr. Robinette comments on the
12 negative consequences of the required 1.1 savings to
13 investment ratio (SIR). Please comment on Mr. Robinette's
14 proposal regarding the Company's funding match for each
15 weatherization job.

16 A. The Company currently funds 50 percent of the
17 cost of qualifying weatherization measures. Mr. Robinette
18 recommends that the Company fund up to the full cost for the
19 work performed. The Company opposes funding the full costs
20 of weatherization jobs. While the Company does fully fund a
21 limited number of special weatherization jobs for tax-exempt
22 organizations, an essential requirement of the current LIWA
23 program is that regular weatherization jobs qualify for and
24 receive governmental funding. This requirement allows the
25 Company to hold the administrative costs of the program to a

1 reasonable level while assuring that our retail customers'
2 funds are used effectively. The Company believes that a
3 continuation of matching funding from LIWA for qualifying
4 measures is appropriate.

5 Q. Please comment on Mr. Robinette's proposal
6 regarding the administrative fee paid through LIWA to the
7 participating agencies and his comments on the SIR.

8 A. Mr. Robinette proposes the administrative fee
9 paid through LIWA to the participating agencies be increased
10 to \$150 per unit. The Company is willing to consider an
11 increase in the administrative fee and is willing to reduce
12 the required SIR from 1.1 to 1.0. The Company proposes that
13 both these matters be addressed with the weatherization
14 agencies during the preparation of next year's contracts
15 and, if necessary, be brought to the Commission for
16 appropriate action under a separate proceeding.

17 Q. Mr. Robinette also proposes an increase in
18 LIWA funding to \$1.2 million. Please comment on this
19 recommendation.

20 A. The Community Action Partnership Association
21 of Idaho recommends a 426% increase in LIWA funding above
22 the 2003 level of non-BPA expenditures. However, the
23 Company has not included increased funding for the Low
24 Income Weatherization Assistance program in its current
25 application before the Commission. Accordingly, it may be

1 more appropriate to investigate funding levels and funding
2 mechanisms outside of this proceeding.

3 The Company proposes reviewing these topics
4 as well as other program design issues with the Energy
5 Efficiency Advisory Group (EEAG). The EEAG is a forum that
6 allows Idaho Power customers, regulatory staff and other
7 interested stakeholders to offer advice to the Company in
8 formulating, implementing, and evaluating energy efficiency
9 and demand reduction programs and I believe that the group
10 could contribute significantly to the discussion. If the
11 Company, with support from the EEAG, determines that changes
12 to the LIWA program design, funding levels, or funding
13 mechanism are appropriate, the changes would be brought to
14 the Commission, if necessary, for appropriate action under a
15 separate proceeding.

16 Q. Does this conclude your direct rebuttal
17 testimony?

18 A. Yes.

BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

CASE NO. IPC-E-03-13

IDAHO POWER COMPANY

EXHIBIT NO. 78

S. FULLEN

Sample Bill
Spanish Text



www.idahopower.com

Questions? Contact us at:
 P.O. Box 30, Boise, ID 83721
 Or call us at 388-2323 (Treasure Valley)
 or (800) 488-6151. Se habla español
 For faster service please call
 Tuesday through Friday, 7:30 a.m. to 6:30 p.m.

Customer Name:
 Account Number:
 Billing Date: 03/14/2003
 Print Date: 03/11/2004

Service Agreement No:
 Service Location: |

Next Read Date: 04/11/2003

| Meter Number | Service Period | | Number of Days | Reading Type | Meter Readings | | Meter Constant | kWh Used |
|--------------|----------------|----------|----------------|--------------|----------------|---------|----------------|----------|
| | From | To | | | Previous | Current | | |
| 002189226089 | 02/10/03 | 03/12/03 | 30 | Regular | 21714 | 23375 | 1 | 1661 |

Residential
 Rate Schedule
 I01

02/10/2003 - 03/12/2003 30 days \$0.00
 Customer Charge, per meter per month \$2.51
 Energy Charge 1,661 kWh @ \$0.068673 per kWh \$114.07
 Franchise Fee 1% \$1.17
 Conservation Program Funding Charge \$0.30
 Federal Columbia River Benefits Supplied by BPA \$3.55 CR

Current Charges - Electric Service.....\$114.50

Average
 Daily Use
 Comparison

| This Month This Year: | | This Month Last Year: * | |
|-----------------------|------|-------------------------|------|
| Days = | 30 | Days = | 30 |
| kWh Billed = | 1661 | kWh Billed = | 2418 |
| kWh per Day = | 55.3 | kWh per Day = | 80.6 |

CR = Credit BLC = Basic Load Capacity
 kWh = Kilowatt-hour G = Generation
 kW = Kilowatt
 * Available after 12 months of service at this location.



NEW CONTACT INFORMATION:

Does Idaho Power have your correct mailing address and phone number? If not, please write any changes below:

New Telephone Number: _____

If writing information below, please check the appropriate box on the reverse side.

Account Number: _____

PROJECT SHARE PLEDGE

Please add the amount indicated to my monthly bill.
 \$2 \$5 \$10 \$ _____

I would like to make a one-time contribution in the amount of \$ _____

Please round-up my monthly bill amount to the nearest dollar and contribute the difference to Project Share.

Thank you and please remember to track your tax-deductible donations.

Exhibit No. 78
 Case No. IPC-E-03-13
 S. Fullen, IPCo
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www.idahopower.com

Questions? Contact us at:
P.O. Box 30, Boise, ID 83721
Or call us at 388-2323 (Treasure Valley)
or (800) 488-6151. Se habla español
For faster service please call
Tuesday through Friday, 7:30 a.m. to 6:30 p.m.

Customer Name:
Account Number:
Billing Date: 03/14/2003
Print Date: 03/11/2004

Due Date:
03/31/2003

Please Pay:
\$114.50

Account Activity

| | |
|-----------------------------|-----------------|
| Previous Balance..... | \$123.28 |
| Payments - Thank You..... | \$123.28CR |
| Balance Forward..... | \$0.00 |
| Current Charges..... | \$114.50 |
| Account Balance..... | \$114.50 |

Please Note: Any unpaid balances will be assessed a monthly charge of one percent (1%) for Idaho customers. Returned checks may be resubmitted electronically for payment. Checks remaining unpaid will be charged a \$20 fee.

Green Power



Harness the Wind: Go Green!

Join Idaho Power customers who are supporting new, renewable power from resources such as wind or solar. Enroll on the Energy Center Web page at www.idahopower.com or call our Customer Service Center.



Account Number:

Please return this portion with your payment and write your account number on your check or money order made payable to Idaho Power. Please bring entire bill when paying at a Pay Station. Thank you!

Please Pay: \$114.50
Due Date: 03/31/2003

Amount Enclosed:

| | |
|--|--------------------------|
| Project Share pledge - noted on reverse side | <input type="checkbox"/> |
| Address/phone correction - printed on reverse side | <input type="checkbox"/> |

Idaho Power
P.O. Box 30
Boise, ID 83721



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