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Idaho Public Utilities Commission
Office of the Secretary
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Boise, Idaho

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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

**DIRECT TESTIMONY OF NANCY HIRSH
ON BEHALF OF NW ENERGY COALITION**

1 A. The NW Energy Coalition is an alliance of more than 100 environmental, civic
2 and human service organizations, progressive utilities and businesses from Oregon,
3 Washington, Idaho, Montana, Alaska and British Columbia. We promote energy
4 conservation and renewable energy resources, consumer and low-income protection
5 and fish and wildlife restoration in the Columbia River Basin. The Coalition has 11
6 member organizations in Idaho, including groups such as Advocates for the West,
7 League of Women Voters, Idaho Rural Council, and South Central Community
8 Action Agency.

9 Q. HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY PROCEEDINGS?

10 A. Yes. I have testified before the District of Columbia and Georgia Public Service
11 Commissions, the Public Utility Commission of Oregon and the Washington Utilities
12 and Transportation Commission. My previous testimony concerned integrated
13 resource planning, rate design issues, utility sale of assets and the public benefit
14 concerns from utility mergers.

15 **II Overview of Testimony**

16 Q. CAN YOU SUMMARIZE YOUR TESTIMONY?

17 A. Yes. Idaho Power is seeking to shift common variable costs into a fixed service
18 charge. This move goes against standard rate design allocations for customer
19 charges, reduces customers' ability and willingness to implement energy saving and
20 bill reduction measures, and unduly impacts low and fixed income households. I will
21 only address the increase in the customer charge for residential customers, as they are
22 a core constituency for the Coalition.

1 **III Residential Customer Charge**

2 Q. HOW IS IDAHO POWER PROPOSING TO CHANGE ITS FIXED CUSTOMER
3 CHARGE?

4 A. Currently, residential customers pay a monthly customer charge of \$2.51. In this
5 case, the Company is proposing a service charge of \$10.00 for residential customers
6 in Schedule 1. This is a 300 percent increase in the fixed monthly charge residential
7 customers see on their bill.

8 Q. WHY IS THE COMPANY PROPOSING SUCH A DRAMATIC INCREASE IN
9 THE CUSTOMER CHARGE?

10 A. On page 11 of his direct testimony, Mr. Gale states that the Company advocates
11 “movement toward cost-of-service results which assign costs to those customers that
12 cause the company to incur the costs.” This proposed move to collect more revenues
13 from fixed charges, rather than volumetric sales, will reduce revenue risk. Increasing
14 the fixed portion of a customer’s bill reduces revenue fluctuations by providing
15 modest guaranteed minimum revenue regardless of weather, energy efficiency
16 improvements and economic conditions.

17 Q. IS THIS THE BEST APPROACH FOR REDUCING REVENUE
18 FLUCTUATIONS?

19 A. No. As NW Energy Coalition witness, Ralph Cavanagh, articulates in his
20 testimony, the Company can take a more comprehensive approach to address the need
21 for more certainty in revenue collection without dramatically increasing the customer
22 charge. Many jurisdictions have used forms of “decoupling” (*i.e.* the separation of
23 revenues from volumetric sales) to address this issue. Under decoupling, true-ups are

1 used to provide the Company with its approved revenue requirement, even when
2 consumption shifts due to weather, energy efficiency improvements and economic
3 conditions. Decoupling protects both the utility and its customers from under- or
4 over-collection of approved revenues, and thus reduces the utility's risk. This
5 solution is a win-win for both customers and shareholders.

6 Q. WHAT APPROACH IS THE COMPANY USING TO CLASSIFY ITS COSTS
7 AMONG CUSTOMER CLASSES?

8 A. In her testimony, Ms. Brilz cites the National Association of Regulatory Utility
9 Commissioners Electric Utility Cost Allocation Manual as the primary guide to the
10 classification of customer costs.

11 Q. HAS THIS MANUAL BEEN FOLLOWED IN OTHER JURISDICTIONS WITH
12 RESPECT TO THE DEVELOPMENT OF FIXED CUSTOMER CHARGES?

13 A. NARUC is clearly a credible source of guidance for state regulators and those
14 they regulate. However, the 1992 Electric Utility Cost Allocation Manual includes
15 some methodologies not widely supported by Commissions around the country. In
16 1992, the Washington Utilities and Transportation Commission sent a letter explicitly
17 rejecting the “minimum distribution” and “minimum-intercept” methods because they
18 include costs beyond basic customer service. The WUTC letter states “the only costs
19 which should be considered customer-related are the costs of meters, services, meter

1 reading and billing. Our staff believes that is the most common approach taken by
2 Commissions around the country” (emphasis in original).¹ (see Exhibit 605)

3 Q. DO YOU SHARE THE VIEW OF THE WUTC STAFF WITH RESPECT TO
4 DESIGNATING CUSTOMER-RELATED CHARGES?

5 A. Yes. Meters, line drops, meter reading and billing are the only costs that are
6 customer-specific costs that do not vary directly with the number of customers served
7 or with energy usage or demand. When developing the cost allocation methodology
8 used in customer class rate spread analysis, some of the costs of poles, wires and
9 transformers may be applied to the customer charge. However, when establishing
10 rate design, it is inappropriate to allocate common, non-assignable costs to the fixed
11 customer charge. For example, if my house burns down, the cost savings to the
12 Company would be limited to not having to provide the meter, meter services and
13 billing. The poles and wires remain in place to serve the neighbors on either side of
14 me. Similarly, if I subdivide my house, the additional cost to the Company would
15 include a new meter, meter reading services and a new billing account, but no
16 additional poles or wires. Costs related to distribution and other infrastructure may
17 be appropriate costs to serve the residential class, but they do not belong in the fixed
18 customer charge as they are not associated with specific customers.

19 Q. WHY SHOULD DISTRIBUTION FACILITY COSTS GENERALLY BE
20 EXCLUDED FROM THE FIXED CUSTOMER CHARGE?

¹ Letter from Paul Curl, Secretary of Washington Utilities and Transportation Commission, to Julian Ajello of the California Public Utility Commission, regarding review of the NARUC Electric Utility Cost Allocation Manual, June 11, 1992.

1 A. These costs are joint costs that cannot be specifically allocated to the customer
2 paying the bill. The costs are real for the residential class but they are costs more
3 associated with demand, number of customers, distance and density -- not an
4 individual customer. Distribution system costs, such as transformers and substations,
5 are driven by throughput and vary over the long-run depending on energy use. For
6 example, transformer upgrades are usually driven by power supply costs and the need
7 to reduce losses. These types of costs reflect area-wide conditions and cannot be
8 attributed to an individual customer. Poles, wires and transformer costs may be fixed
9 in the short-term but ultimately they are sized for long-term demand.

10 A leading author in utility rate design is critical of the inclusion of a portion of
11 annual maintenance and capital costs of the distribution system in customer cost
12 calculations. In his book, Principles of Public Utility Rates, James Bonbright states
13 “the inclusion of the costs of a minimum-sized distribution system among the
14 customer-related costs seems to me clearly indefensible...”²

15 Q. WHAT COSTS DO THE OREGON AND WASHINGTON COMMISSIONS
16 INCLUDE IN THE CUSTOMER CHARGE?

17 A. The Washington and Oregon Commissions have general policies to allow only the
18 inclusion of meters, line drops, billing and meter reading as part of the calculation of
19 the customer charge. According to Bob Jenks, executive director of the Citizens
20 Utility Board of Oregon, the policy of Oregon has been consistent for the past decade.
21 As part of the Oregon Commission’s overall rate design philosophy to send customers

² Bonbright, James C., Principles of Public Utility Rates, New York, Columbia University Press, 1961, p. 347.

1 the appropriate price signal, only directly assignable costs are included in the
2 customer charge.

3 Q. ARE YOU PROPOSING A HARD RULE THAT THE TOTAL COSTS OF
4 METERS, LINE DROPS, METER READING AND BILLING SHOULD REPRESENT
5 THE FIXED CHARGE?

6 A. No. In my opinion, the sum of these costs represents the absolute maximum
7 amount of a fixed charge. However, other factors, including the need to create
8 appropriate incentives to guide energy usage, instruct that fixed customer charges
9 should be less than the sum of those listed costs. When considering the question of
10 whether customer charges should be increased and usage charges decreased,
11 Frederick Weston, with the Regulatory Assistance Project, concluded: “for the most
12 part, the answer is no, and even suggests that it may be appropriate in certain cases to
13 reduce customer charges.”³ (See Exhibit 606). I further explain the policy reasons for
14 this opinion later in my testimony.

15 Q. WHAT COSTS DOES THE COMPANY INCLUDE IN ITS COST OF SERVICE
16 FOR RESIDENTIAL CUSTOMERS?

17 A. In Ms. Brilz’s Exhibit 42 – Cost of Service Unit Costs, the costs for Schedule 1
18 customers is outlined. This list includes substations, numerous line charges, services,
19 meters and meter reading, customer accounts, uncollectibles, and customer assistance.

³ Weston, Frederick, *Charging For Distribution Utility Services: Issues in Rate Design, Regulatory Assistance Project*, December 2000, p. 46.

1 Q. WHAT PERCENTAGE OF THE COMPANY'S STATED TOTAL COST OF
2 SERVICE FOR RESIDENTIAL CUSTOMERS WOULD BE COLLECTED
3 THROUGH THE PROPOSED FIXED CHARGE?

4 A. Exhibit 42 shows that the total cost of service for residential customers is \$24.61
5 per customer per month. A \$10.00 service charge is about 41 percent of \$24.61.

6 Q. HOW DOES THE COMPANY ARRIVE AT \$10.00?

7 A. On pages 4&5 of her direct testimony, Ms. Brilz describes customer related costs
8 as the "investment in meters, a portion of the investment associated with distribution
9 facilities, the costs associated with meter reading and billing, and the costs associated
10 with maintaining the availability of service regardless of whether service is actually
11 taken." From reviewing the Company's testimony it is not clear how the \$10 was
12 derived. The costs of meters, meter reading, billing and line drops are specifically
13 delineated in Exhibit 42; however it is not apparent how the company determined the
14 "portion of the investment associated with distribution facilities" and "costs
15 associated with maintaining the availability of service regardless of whether service is
16 actually taken" that were included in the proposed fixed charge. The Company
17 appears to have summed all costs of service for Schedule 1 customers (less certain
18 revenues), and then reduced that total amount (\$24.61) by 40% to reach the figure of
19 \$10. The Company has not articulated a basis for this 40% multiplier factor, and I
20 have not been able to independently determine its basis.

1 Q. WHAT ELEMENTS OF THE LISTED COSTS OF SERVICE FOR SCHEDULE 1
2 CUSTOMERS IN THE BRILZ EXHIBIT 42 COULD PROPERLY BE INCLUDED
3 IN A FIXED CUSTOMER CHARGE?

4 A. The table below identifies costs in Brilz Exhibit 42, page 1 (Residential Service -
5 Schedule 1) that appear to correlate with categories of costs I discussed above, which
6 collectively form an absolute cap on any fixed charge.

Line	Function	Service \$/Cust/Month
276	Meters	2.362850
278	Install on Cust. Premises	0.20761
281	Meter Reading	1.51315
282	Customer Accounts	2.68819
Total		6.7718

7

8 Q. IS IT YOUR RECOMMENDATION THAT THE FIXED CUSTOMER CHARGE
9 FOR SCHEDULE 1 CUSTOMERS SHOULD BE \$6.77?

10 A. No. The figure of \$6.77 is the maximum that could be justified based on the
11 information submitted by the Company. For the policy reasons discussed further
12 below, it is my opinion that the fixed charge should be considerably lower than this
13 amount.

1 Q. ARE YOU FAMILIAR WITH THE CUSTOMER CHARGES OF SOME OF THE
2 OTHER INVESTOR-OWNED UTILITIES OPERATING IN THE PACIFIC
3 NORTHWEST?

4 A. Yes (See Exhibit 607):

5 Puget Sound Energy: \$5.50
6 Avista (Washington): \$5.00
7 Avista (Idaho): \$4.00
8 Pacific Power (Washington): \$4.50
9 Pacific Power (Oregon): \$7.00
10 Portland General Electric: \$10.00⁴

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13 **IV Adverse Impacts from Increasing the Fixed Customer Charge**

14 Q. DOES MOVING A GREATER PROPORTION OF COST RECOVERY INTO A
15 FIXED CUSTOMER CHARGE HAVE ADVERSE IMPACTS?

16 A. Yes. There are a number of significant impacts on customers.

17 First, the marginal cost of the next increment of peak demand and baseload
18 energy is clearly more than the average system cost. Putting common costs into the
19 energy charge gives a price signal to customers that reflects this reality. The
20 Company's proposal reduces that price signal to customers, thereby reducing the
21 incentive to increase energy efficiency and conserve energy. A high fixed portion of
22 the bill gives the customer less control over his or her bill. Customers become less

⁴ In Commission order UE 155, pages 21-22, August, 2001, the Commission agreed to the \$10 customer charge in order to prevent a rate decrease for small use customers when all other customers were facing a rate increase. PGE originally proposed a \$7.00 customer charge for line drop, meters, meter reading and billing. The customer charge was increased to \$10.00 to compensate for a tiered rate structure adopted by the Commission which reduced the overall rate increase originally sought by PGE.

1 motivated to reduce consumption and improve efficiency, therefore efficiency
2 investments become more expensive as opportunities for increasing efficiency are
3 lost. A high customer charge conflicts with the Company's demand-side
4 management programs that invest in energy efficiency measures in customer homes
5 and businesses. Over the past two years, the Company has changed its corporate
6 focus to include a commitment to acquire energy savings as a resource for meeting
7 customer supply needs and reducing peak load. With funds from the demand-side
8 management tariff rider, the Company has initiated a more public energy efficiency
9 campaign than at anytime in the last decade. The Energy Efficiency Advisory Group
10 is working closely with the Company to help design the most effective program
11 offerings for customers. The Company is marketing and financing programs to
12 encourage customers to participate in the rejuvenated Idaho Power energy efficiency
13 programs. Yet, the increase in the fixed charge makes the job of the energy
14 efficiency staff that much harder, as customers see less reward for participating in the
15 Company's programs.

16 Second, the Company's 2002 Integrated Resource Plan identified peak demand as
17 a critical problem for the Company. Clearly, the introduction of seasonal rates is a
18 direct attempt by the Company to address this problem. However, as mentioned
19 above, increasing the fixed customer charge tells the customer that there is less cost
20 associated with increased usage at the same time that the seasonal rates are trying to
21 send the opposite signal. Perhaps a better approach would be to maintain the
22 customer charge and the rate for the first 500 – 1000 kwh/month at current levels, and
23 apply an increase only to the end-block of power during the peak season. An inverted

1 rate structure focuses customer attention on discretionary usage during the peak
2 period. PacifiCorp in Oregon, Pacific Gas and Electric and Southern California
3 Edison all use this approach. Inverted rates must be accompanied by aggressive
4 energy efficiency programs to assist customers in responding to the price signal.

5 Third, the increase from \$2.51 to \$10.00 is a 300 percent increase. That is quite a
6 dramatic increase in a service territory known for some of the lowest rates in the
7 country. The overall rate shock associated with the requested rate increase will be
8 further exacerbated by the fact that customers can't do anything to reduce the service
9 charge portion of their bill. If these costs are incorporated into the energy charge,
10 then customers have the ability to reduce consumption through improved efficiency
11 and reduce their overall bill.

12 Fourth, low- and fixed-income households pay more for their energy costs as a
13 percent of their income than non low- and fixed-income customers. An increase in
14 the fixed charges would disproportionately impact low- and fixed-income customers.
15 As discussed earlier, a high fixed charge that inappropriately includes costs that are
16 really driven by usage – either energy or demand – will shift costs from high usage
17 customers to this fixed charge. Small use customers in trailer courts, multi-family
18 buildings and in densely populated areas do not drive up demand and increase
19 pressure on the distribution system in the same way that new sub-divisions with large
20 housing stock cause upgrades. Small use customers, which may be fixed income
21 seniors living in apartments or trailer courts, will see a greater increase in rates. By
22 moving non-energy costs into the fixed service charge, the Company is rewarding
23 high use customers with a lower percent increase in rates. This situation exacerbates

1 the high percent of income payment problems faced by low- and fixed- income
2 households.

3 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

4 A. Yes.

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Sharon L. Nelson, Chairman
 Richard D. Cecil, Commissioner
 A. J. "Bob" Fardine, Commissioner



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

P.O. Box 9022 • 1300 S. Evergreen Park Dr. S.W. • Olympia, Washington 98504-9022 • (206) 753-6423 • (SCAN) 234-6423

REF:6-1132

June 11, 1992

Mr. Julian Ajello
 California PUC
 505 Van Ness Avenue
 San Francisco, California 94102

Dear Mr. Ajello:

Please accept this belated response to your request for review of the February, 1991 draft of the new NARUC Electric Utility Cost Allocation Manual. Our staff recognizes that the final has now been printed. However, the inconsistent treatment of customer related costs in the manual is of concern. In three areas, three different approaches are presented. The first is an energy weighted approach, the second the so-called "minimum-system" or "zero-intercept" method, and the last is the "basic customer" method.

At page 39 of the draft, distribution plant is identified as being customer, demand, and energy-related. That is consistent with the treatment of gas distribution plant by this Commission, where it has ordered that 50% of distribution mains be treated as commodity-related. Our Commission has not made specific findings on electric distribution plant, except as set forth below.

At pages 91-100 of the draft, the minimum-system and zero intercept methods are presented. These methods do not conform to the matrix on page 39, which incorporates an energy component of distribution plant. Unfortunately, these two methods are the only methods presented. These are the two methods our Commission has explicitly rejected.

Finally, at page 148, in the section on marginal cost determination, the "basic customer" method, counting as customer related costs only meters, services, meter reading, and billing, is identified and defended.

Previous drafts included additional methods which are missing from the final version. For example, the 10/31/88 draft discussed at the fall meeting in San Francisco contained a section explicitly setting forth the basic customer method in the embedded cost section. In November of 1988, a section discussing the energy-weighted method was distributed to the Committee.

EXHIBIT

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Mr. Julian Ajello
June 11, 1992
Page 2

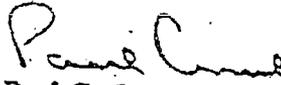
Our Commission has been extremely clear about one thing in this area: that the "minimum-distribution" and "minimum-intercept" methods are not acceptable, and that the only costs which should be considered customer-related are the costs of meters, services, meter reading and billing. Our staff believes that is the most common approach taken by Commissions around the country. For example, in Iowa, the administrative rules of the Commission set this forth explicitly, while in Arizona and Illinois, the Commissions have explicitly rejected the minimum-system or minimum-intercept methods in favor of the basic customer approach.

In gas cost of service, our Commission has explicitly found that distribution plant (including service connections) is partially demand-related and partially commodity related, consistent with the matrix on page 39. The corresponding plant on the electric side - poles, conductors and transformers - has not been positively resolved in any cases to date. A recently filed electric cost of service case will provide an opportunity for advocates of the demand-only allocation approach and those favoring an energy weighing approach to make their cases before the Commission.

We hope that it is possible to either correct future editions of the Manual to reflect the variety of approaches to determining customer-related costs, or to even issue a correction to this edition.

Please feel free to contact Bruce Folsom at (206) 586-1132 with any questions you may have.

Sincerely,


Paul Curl
Secretary

CHARGING FOR DISTRIBUTION UTILITY
SERVICES:
ISSUES IN RATE DESIGN

December 2000

Frederick Weston

with assistance from:

Cheryl Harrington

David Moskovitz

Wayne Shirley

Richard Cowart

The Regulatory Assistance Project
16 State Street, Montpelier, VT 05602
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through their effects (reduced public health, acid deposition, etc.).⁶⁷ Put another way, the marginal environmental costs of generation, which are largely associated with fuel consumption and therefore are directly correlated to kilowatt-hour production, are not reflected in current prices for electricity.

Because generation markets do not internalize all the costs of production, it falls to regulators and policymakers to correct the failure. Volumetric pricing for distribution services, appropriate for the reasons already stated, is also justified on the ground that there are incremental kilowatt-hour costs that commodity prices fail to capture; in this way, the mark-up on usage-based distribution charges needed to cover the embedded revenue requirement serves as a proxy for some portion of the environmental damage costs of production. Whether the mark-up is sufficient to "cover" those damage costs and whether additional mitigation efforts are warranted remain, of course, questions policymakers must grapple with.

4. Practical Considerations

Usage-based rates are well-understood by consumers. They are, for the most part, uncomplicated and can be easily administered. Fixed prices share these attributes.

5. Other Issues

a. Customer Charges

One kind of fixed charge has long been a fixture of utility pricing: the monthly (or daily) customer charge. In most jurisdictions, recurring periodic rates designed to cover at least the costs of metering and billing serve to generate a stream of revenues that does not vary with usage and thereby provides some measure of financial risk mitigation for the utility. For residential customers, these charges range from as little as a dollar to ten dollars or more per month. For commercial and industrial customers, they can be considerably greater.⁶⁸

The current debate about pricing for distribution services really comes down to a simple question: should customer charges be increased and usage charges decreased (or even eliminated) and, if so, by how much? Our inquiry concludes that, for the most part, the answer is no, and even suggests that it may be appropriate in certain cases to reduce customer charges. Of course, decisions taken by regulatory commissions will be based on the particular facts of each case; our

67. Competitive commodity markets for electricity do not capture these costs in prices; nor are they typically reflected in marginal cost studies in those states where the industry remains vertically integrated.

68. One variation of the customer charge is the "minimum bill" approach, such as that used by Central Maine Power (see Section II.C.3.), which requires payment of a monthly charge, but with it also comes a specified number of "free" kilowatt-hours of delivery service. Delivery in excess of the allowance is billed on a per-unit (kWh) basis.

intention here is to examine the various policy considerations and potential consequences of different actions.

We do not foresee an outright elimination of customer charges, although, as competition in the industry grows and alternatives to grid-provided power become more cost-effective, we believe that they will become less and less tenable. The rate-making principles that counsel against the imposition of fixed charges also discourage radical and immediate changes in rate design. Nominal customer charges have been around a long time. They are well-understood by consumers, and they provide some revenue stability for utilities. Any change in rate design should be deliberate, to minimize potentially deleterious impacts on customers and companies.

In evaluating proposals for redesign of distribution rates, commissions may be asked to consider structures that call for some blend of customer and usage charges, weighted so as to increase the revenue share of the fixed rate elements (in relation to historical allocations). Although much of the discussion in this paper has been cast in "either-or" terms (usage-based vs. fixed rates), its general prescriptions apply no less to any intermediate proposal: the magnitude of a shift from usage-based to fixed rate elements will have predictable effects on consumer demand, utility revenues, and long-term dynamic efficiency. As one moves along the continuum of rate designs from usage-based to fixed, the benefits of the former give way more and more to the difficulties of the latter. This is the kind of trade-off that commissions are often faced with balancing: our analysis concludes that the balance strongly favors a rate structure that allows consumers to avoid charges, when there cost-effective alternatives that they value more highly. Usage-based rates fit this bill; so do "hook-up fees" (see the following section).

b. Customer Costs and Hook-Up Fees

In recognition of the dedicated nature of customer-related facilities (meters and service drops), regulators might consider an alternative rate structure for recovering their costs. As discussed earlier, marginal customer investment costs can be distinguished from other utility marginal costs of service, insofar as they are only avoidable at the time that the facility is installed or replaced. In a competitive market, a customer would pay the prevailing price of purchasing the hook-up at the time of installation, which would approximate marginal cost. This is the way in which consumers purchase many durable goods which are affixed to their premises and have no other uses apart from the premises (curtains, ceiling insulation, etc.). Consequently, it may be more economically efficient to recover the costs of access equipment in the form of a customer "hook-up" fee.

The revenue impacts of this charge should be carefully considered. If hook-up fees are to be implemented, it is critical that double-counting of costs be avoided. Regulators must be careful to assure that these costs, if recovered in a hook-up fee, are not also included in other distribution charges.

Twenty-Third Revised Sheet No. 7
 Canceling Twenty-Second Revised
 Sheet No. 7

WN U-60

PUGET SOUND ENERGY
Electric Tariff G

SCHEDULE 7
RESIDENTIAL SERVICE
 (Single phase or three phase where available)

AVAILABILITY:

1. This schedule is limited to residential service, which means service that is delivered through one meter to a single-family unit and is used principally for domestic purposes, even though such service may incidentally be used for nondomestic purposes. Electric service for nondomestic use may be separately metered and served under the provisions of the applicable general service schedule, provided that such service does not include single-family units.
2. If this schedule is applied to transient occupancy in separately metered living units, billing shall be in the name of the owner on a continuous basis.
3. Single-phase motors rated greater than 7-1/2 HP shall not be served under this schedule except by the express written approval of the Company.
4. Space conditioning and water heating capacities shall be energized in increments of 6 KW or less by a thermostat, low voltage relay, or suitable time delay equipment.
5. Customers requiring three-phase service under this schedule will be required to contribute the incremental cost of three-phase facilities to provide such service.

MONTHLY RATE:

Basic Charge: \$5.50 single phase or \$13.60 three phase

Energy Charge:

<u>Base Rate</u>	<u>Low Income Program</u>	<u>Effective Rate</u>	
6.2727¢	0.0126¢	6.2853¢ per kWh for the first 600 kWh	(R)(R)
7.9144¢	0.0126¢	7.9270¢ per kWh for all over 600 kWh	(R)(R)

Issued: July 1, 2003
 Advice No.: 2003-14

Effective: October 1, 2003

Issued By Puget Sound Energy

By:



Kari R. Karzmar

Title: Director, Regulatory Relations

EXHIBIT

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607

AVISTA CORPORATION
dba Avista Utilities

SCHEDULE 1

RESIDENTIAL SERVICE - IDAHO

(Single phase & available voltage)

AVAILABLE:

To Customers in the State of Idaho where Company has electric service available.

APPLICABLE:

To service for domestic purposes in each individual residence, apartment, mobile home, or other living unit when all such service used on the premises is supplied through a single meter.

Where a portion of a dwelling is used regularly for; either (a) the conduct of business, (b) where a portion of the electricity supplied is used for other than domestic purposes, or (c) when two or more living units are served through a single meter, the appropriate general service schedule is applicable. However, if the wiring is so arranged that the service for all domestic purposes can be metered separately, this schedule will be applied to such service.

MONTHLY RATE:

	\$4.00 Basic Charge, plus	
First	600 kWh	4.555¢ per kWh
All over	600 kWh	5.303¢ per kWh

Monthly Minimum Charge: \$4.00

OPTIONAL SEASONAL MONTHLY CHARGE:

A \$4.00 monthly charge shall apply to Customers who close their account on a seasonal or intermittent basis, provided no energy usage occurs during an entire monthly billing cycle while the account is closed. Customers choosing this option are required to notify the Company in writing or by phone in advance and the account will be closed at the start of the next billing cycle following notification. If energy is used during a monthly billing cycle, the above listed energy charges and basic charge of \$4.00 shall apply.

SPECIAL TERMS AND CONDITIONS:

Service under this schedule is subject to the Rules and Regulations contained in this tariff.

The above Monthly Rate is subject to increases as set forth in Tax Adjustment Schedule 58, Temporary Rate Adjustment Schedule 65, Temporary Power Cost Adjustment Schedule 66, and Energy Efficiency Rider Adjustment Schedule 91.

Issued July 7, 2000

Effective August 1, 2000

Issued by Avista Utilities
By

Thomas D. Dukich

, Manager, Rates & Tariff Administration

Third Revision Sheet 1

Canceling

WN U-28

Second Revision Sheet 1

AVISTA CORPORATION
dba Avista Utilities

SCHEDULE 1

RESIDENTIAL SERVICE - WASHINGTON

(Single phase & available voltage)

AVAILABLE:

To Customers in the State of Washington where Company has electric service available.

APPLICABLE:

To service for domestic purposes in each individual residence, apartment, mobile home, or other living unit when all such service used on the premises is supplied through a single meter.

Where a portion of a dwelling is used regularly for; either (a) the conduct of business, (b) where a portion of the electricity supplied is used for other than domestic purposes, or (c) when two or more living units are served through a single meter, the appropriate general service schedule is applicable. However, if the wiring is so arranged that the service for all domestic purposes can be metered separately, this schedule will be applied to such service.

MONTHLY RATE:

\$5.00 Basic Charge, plus
 First 600 Kwh 4.52¢ per Kwh
 Next 700 Kwh 5.26¢ per Kwh
 All over 1300 Kwh 6.16¢ per Kwh

Minimum Charge: \$5.00

SPECIAL TERMS AND CONDITIONS:

Service under this schedule is subject to the Rules and Regulations contained in this tariff.

The above Monthly Rate is subject to the provisions of Tax Adjustment Schedule 58, Energy Efficiency Rider Adjustment Schedule 91, Residential and Farm Energy Rate Adjustment Schedule 59, and Temporary Power Cost Surcharge Schedule 93.

Issue June 21, 2002

Effective July 1, 2002
 Per WUTC 5th Supp. Order in Docket UE-011595

Issued by Avista Corporation

By

Kelly Norwood

Vice President, Rates & Regulation

WN U-74

Ninth Revision of Sheet No. 16
Canceling Eighth Revision of Sheet No. 16

PACIFIC POWER & LIGHT COMPANY

FOR COMMISSION'S RECEIPT
STAMPSCHEDULE 16
RESIDENTIAL SERVICEAVAILABLE:

In all territory served by Company in the State of Washington.

APPLICABLE:

To single-family residential Customers only for all single-phase electric requirements when all service is supplied at one point of delivery. For three-phase residential service see Schedule 18.

MONTHLY BILLING:

The Monthly Billing shall be the sum of the Basic and Energy Charges.

All Monthly Billings shall be adjusted in accordance with Schedules 91, 97, 98, 99 and 191.

Basic Charge: \$4.50Energy Charge:

Base

Rate

4.285¢ per kWh for the first 600 kWh

6.025¢ per kWh for all additional kWh

MINIMUM CHARGE:

The monthly Minimum Charge shall be the Basic Charge. A higher minimum may be required under contract to cover special conditions.

CONTINUING SERVICE:

Except as specifically provided otherwise, the rates of this Tariff are based on continuing service at each service location. Disconnect and reconnect transactions shall not operate to relieve a Customer from monthly minimum charges.

RULES AND REGULATIONS:

Service under this Schedule is subject to the General Rules and Regulations contained in the tariff of which this Schedule is a part and to those prescribed by regulatory authorities.

Issued November 25, 2002 Effective January 1, 2003Issued by PACIFIC POWER & LIGHT COMPANYBy D. Douglas Larson Title Vice President, Regulation

TF2 16.E

Advice No. 02-006

Form F

Pacific Power

Oregon Price Summary
In Effect as of September 1, 2003

Schedule 4 (Standard Residential)

Customer Charge	Energy Charge	0-500 KWh	501-1000 KWh	>1000 KWh	Deferred Accounting Adjustment	Y2K Deferral Adjustment	Sale of Centralia Adjustment	Systems Benefit Charge Adjustment	Trial Mountain Mine Closure Costs Surcharge	Sale of Halsey Property Surcredit	Supply Service Schedule	Residential Consumer SB1149 Adjustment	Small Non Residential Consumer SD1149 Adjustment	Large Non Residential Consumer SR1149 Adjustment	Rate Mitigation Adjustment
57.00	3.917	0.334	0.002	-0.191	0.190	0.020	-0.034	-0.194	0.014	4.058	2.512	6.570 cents/KWh	3.00%	-0.47%	-1.387
	3.917	0.334	0.002	-0.191	0.190	0.020	-0.034	-0.194	0.014	4.058	3.026	7.084 cents/KWh	3.00%	-0.47%	-0.601
	3.917	0.334	0.002	-0.191	0.190	0.020	-0.034	-0.194	0.014	4.058	3.796	7.854 cents/KWh	3.00%	-0.47%	-0.601

(*) See Tariff for application for special conditions.
 (***) Prior to Meter Credit and BPA Credit. Also does not include the effect of Schedule 91 (Low Income Assistance). For Schedule 4 customers add \$0.38 per meter per month.
 (****) Cents Per Qualifying KWh.

Portland General Electric Company
P.U.C. Oregon No. E-17

Third Revision of Sheet No. 7-1
Canceling Second Revision of Sheet No. 7-1

**SCHEDULE 7
RESIDENTIAL SERVICE**

AVAILABLE

In all territory served by the Company.

APPLICABLE

To Residential Consumers.

CHARACTER OF SERVICE

60-hertz alternating current of such phase and voltage as the Company may have available.

MONTHLY RATE

The sum of the following charges per Point of Delivery:*

<u>Basic Charge</u>			
Single Phase Service	\$10.00		
Three Phase Service	\$16.00		
<u>Transmission and Related Services Charge</u>	0.324 ¢ per kWh		
<u>Distribution Charge</u>	2.272 ¢ per kWh		
Energy Charge			
Standard Cost of Service Offer			
First 250 kWh	4.327 ¢ per kWh		(I)
Over 250 kWh	4.807 ¢ per kWh		(I)
or			
Time-of-Use (TOU) Offer			
(enrollment is necessary)			
On-Peak Period	7.990 ¢ per kWh		(I)
Mid-Peak Period	4.807 ¢ per kWh		(I)
Off-Peak Period	2.926 ¢ per kWh		(I)
First 250 kWh block credit	(0.480)¢ per kWh		(R)

* See Schedule 100 for applicable adjustments

Advice No. 03-21
Issued November 17, 2003
Pamela Grace Lesh, Vice President

Effective for service
on and after January 1, 2004

Portland General Electric Company
P.U.C. Oregon No. E-17

Second Revision of Sheet No. 7-2
Canceling First Revision of Sheet No. 7-2

SCHEDULE 7 (Continued)

MONTHLY RATE (continued)

Renewable Portfolio Options

(available upon enrollment in either Energy Charge option)

Renewable Usage	0.800¢ per kWh in addition to Energy Charge	
Fixed Renewable	\$3.50 per month per block	
Habitat	\$2.50 per month and 0.800¢ per kWh in addition to Energy Charge	(R)(M) (N)

Nonstandard Metering Charge**

Single Phase meter	\$1.00	(R)
Three Phase meter	\$4.25	

** Applicable to TOU

RENEWABLE ENERGY RESOURCE PORTFOLIO OPTIONS

The Consumer shall be charged for the Renewable Portfolio Option in addition to all other charges under this schedule for the term of enrollment in the Renewable Portfolio Option.

Habitat Option

The organization, For the Sake of Salmon, will receive \$2.50 per month from each Consumer enrolled in the Habitat Option. The 0.800¢ per kWh shall purchase Tradable Renewable Credits (TRCs) and/or renewable energy consisting of at least twenty percent of new renewable resources and the remainder from other qualifying resources.

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Fixed Renewable Option

The Company shall purchase 200 kWhs of Tradable Renewal Credits (TRCs) and/or renewable energy per block enrolled in the Fixed Renewable Option. All TRCs purchased under this option shall come from new renewable resources.

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Pamela Grace Lesh, Vice President

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