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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER )  
COMPANY'S PETITION FOR AN ORDER ) CASE NO. IPC-E-05-19  
PROVIDING A LIMITED WAIVER OF )  
UTILITY CUSTOMER RELATION RULE ) PETITION  
201.03 AS IT IS APPLIED TO TIME- )  
VARIANT PRICING SERVICE. )  
\_\_\_\_\_ )

COMES NOW Idaho Power Company ("Idaho Power" or the "Company") and pursuant to RP 053, hereby requests that the Commission issue its order providing Idaho Power with a limited waiver of Utility Customer Relation Rule 201.03 to allow bills for customers taking time-variant pricing service facilitated by advanced meter reading to display total consumption information but not beginning and ending meter readings. This request for a limited waiver is based on the following:

1. Rule 201.03 of the Commission's Utility Customer Relation Rules (IDAPA 31.21.01) provides that customer bills based on metered service will display the beginning and ending meter readings.

2. Idaho Power's recently approved Schedules 4 and 5, which implement the Energy Watch and Time-of-Day Programs for residential customers, and Idaho Power's Schedule 19, all utilize advanced meter reading ("AMR") to facilitate time-variant pricing. Because of the time-variant nature of the service under Schedules 4, 5 and 19, customers' hourly usage throughout the billing period is accumulated into the appropriate time blocks (e.g., on-peak, mid-peak, and off-peak) in order to process the billings. The meter data translation system used to accumulate the hourly usage data into the appropriate time periods will provide to the Company's billing system the total energy consumption for each of the time periods. However, the meter data accumulation process described above precludes the display of beginning and ending meter readings on customers' bills. As a result, beginning and ending meter readings are not available where time-variant pricing is facilitated by AMR.

3. Modifying the meter data translation system, which is owned and maintained by a third party, to provide both beginning and ending meter readings and the accumulated hourly usage data in the appropriate time periods is not economically feasible .

4. As previously noted, customer bills will display the total metered energy consumption broken into each of the time periods. As a result, customers will receive the total consumption data as well as all of the other data required by Rule 201.

5. The Company requests that this Petition be processed under RP 201, *et seq.*, allowing for consideration of issues to be processed under Modified Procedure, i.e., by written submissions rather than by an evidentiary hearing.

6. Service of pleadings, exhibits, orders and other documents relating to this proceeding should be served on the following:

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WHEREFORE, based on the foregoing, the Company respectfully requests that the Commission issue its order providing a limited exception to Rule 201.03 and allow Idaho Power's bills for those metering installations where time variant pricing is facilitated by advanced meter reading to provide total metered monthly energy consumption data but not provide beginning and ending monthly meter readings.

Respectfully submitted this 2nd day of June, 2005.



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BARTON L. KLINE  
Attorney for Idaho Power Company