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Attorney for the Commission Staff

## 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 201.03	)	
AS IT IS APPLIED TO TIME-VARIANT	)	COMMENTS OF THE
PRICING SERVICE.	)	COMMISSION STAFF
	)	

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**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Kira Dale Pfisterer, Deputy Attorney General, and submits the following comments in response to Order No. 29807.

### BACKGROUND

On June 2, 2005, Idaho Power Company filed a Petition requesting an Order providing Idaho Power with a limited waiver of Utility Customer Relations Rule 201.03 in order to accommodate a technology issue related to a problem with the Company's meter data translation system (MDTS). The Company's MDTS is used to implement the time-variant pricing associated with Idaho Power's Schedules 4, 5, and 19. Rule 201.03 requires that beginning and ending meter readings appear on customers' monthly billings.

## **THE PETITION**

Currently, the Company's MDTs and billing systems do not integrate in a way that allows the beginning and ending meter readings to be displayed on the Company's bills. According to the Company, it would be costly and time-consuming to modify the two systems so that the beginning and ending meter readings would print on the Company's monthly bills for customers enrolled in time-variant pricing programs.

There are three tariff rates or schedules that involve time-variant pricing that would be affected by this proposed waiver. Under Idaho Power's Schedule 19, the energy charge varies by whether the customer takes secondary, primary or transmission service as well as the time of day and season. Schedule 19 applies to large commercial customers with metered demand of 1,000 kW or more per billing period.

In addition to Schedule 19, Idaho Power has two pilot programs featuring time-variant pricing. Both pilot programs are: (1) voluntary; (2) available only to the Company's residential customers located in the Emmett Valley, and (3) will expire on April 1, 2006. Under Idaho Power's Schedule 4 Energy Watch pilot program, customers will pay approximately 5.3 cents per kilowatt-hour at any time except during those times the Company advises the customer there is an Energy Watch in effect. Customers who opt for this Schedule will be billed 20 cents per kilowatt-hour used during the 4-hour Energy Watch time period. Under Idaho Power's Schedule 5 Time-of-Day pilot program, the price paid per kilowatt-hour varies between approximately 6.9 and 5.3 cents per kilowatt-hour, depending upon the time of day electricity is used. The Schedule 4 and 5 pilots are limited to 300 meters each. Currently the pilots have a total of 172 enrolled customers.

## **STAFF ANALYSIS**

Initially, Staff was concerned about the lack of a beginning and ending meter reading displayed on customer bills because it would make resolving billing disputes more difficult. However, it is Staff's understanding that actual meter reading data can be retrieved easily from the third-party vendor data translation system should a dispute or question arise. The information required by Rule 201.03 will be available, but it will not be printed on bills due to technical constraints.

In addition, Staff notes that the two residential pilot programs are of limited duration and are only available to a limited number of customers. In general, customers will not be harmed in the

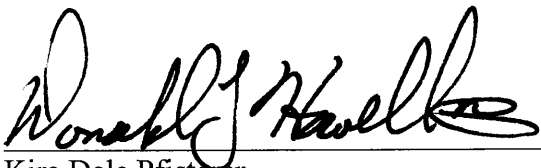
short run by the lack of meter readings printed on bills since Idaho Power will provide this information upon request.

In its Petition, the Company did not identify a specific period during which the waiver would be in effect. Staff recommends that the waiver expire on December 31, 2006 so that the Company will have adequate time to evaluate its experience with time-variant pricing programs and determine whether it can comply with Rule 201.03. Should it choose to do so, the Company could seek to extend the waiver period or seek a permanent waiver on or before year-end 2006.

#### **STAFF RECOMMENDATION**

Staff recommends that Idaho Power's petition be approved and a limited waiver of Rule 201.03 be granted for those metering installations where time-variant pricing is facilitated by advanced meter reading. Staff recommends that the waiver expire on December 31, 2006.

Respectfully submitted this 11<sup>th</sup> day of July 2005.

for   
Kira Dale Pfisterer  
Deputy Attorney General

Technical Staff: Dave Schunke  
Beverly Barker  
Marilyn Parker

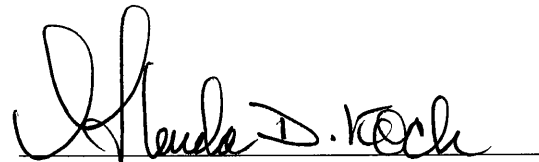
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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 11<sup>TH</sup> DAY OF JULY 2005, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-05-19, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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SECRETARY