An IDACORP Company

RECEDED
Lisa D. Nordstrom Attorney

October 24, 2006

Jean D. Jewell, Secretary<br>Idaho Public Utilities Commission<br>472 West Washington Street<br>P. O. Box 83720<br>Boise, Idaho 83720-0074

Re: Case No. IPC-E-06-25
Stewart v. Idaho Power Company
Dear Ms. Jewell:
Please find enclosed for filing an original and seven (7) copies of Idaho Power Company's Answer in the above-referenced matter.

I would appreciate it if you would return a stamped copy of this transmittal letter in the enclosed self-addressed, stamped envelope.

Very truly yours,


LDN:sh
Enclosures

LISA D. NORDSTROM, ISB \# 5733
BARTON KLINE, ISB \# 1526
Idaho Power Company
1221 West Idaho Street
P. O. Box 70

Boise, Idaho 83707
Telephone: (208) 388-5825
FAX Telephone: (208) 388-6936
Attorney for Idaho Power Company

## RECEIVED

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

REID STEWART,
Complainant
v.

IDAHO POWER COMPANY
Respondent))

Case No. IPC-E-06-25
ANSWER

Respondent, Idaho Power Company ("Idaho Power" or the "Company") hereby answers the Complaint of Reid Stewart in the above-entitled case as follows:

## BACKGROUND

## 1. Removal of Single-Phase Service

On August 9, 2006, the Company received an inquiry from Commission Staff regarding customer Reid Stewart. Mr. Stewart had indicated to Staff that he had two unused power poles on his property that he wanted to have removed and that his friends could remove them less expensively than the Company.

The above-referenced two poles were used to provide single-phase service and were used until December of 2003 to serve a manufactured home located on Mr. Stewart's property. Prior to Staff's inquiry, Mr. Stewart had contacted Idaho Power Company to
request that the facilities be relocated so he could install a pivot irrigation system. An Idaho Power Company Facility Representative met with Mr. Stewart at his property in May 2006 and gave him a rough estimate of $\$ 800$ for Idaho Power to remove two poles, line, a single-phase transformer, and related facilities. At the time of the service visit, the manufactured home was still located on the site.

## Removal of Three-Phase Service

On August 16, 2006, the Company received another Staff inquiry regarding Reid Stewart's requested removal of a three-phase service serving an irrigation pump located several miles from the single-phase facilities described above. The irrigation pump was active and a meter read of $8,000 \mathrm{kWh}$ was taken on September 25,2006 . The facilities to be removed at the second site include four power poles, four lines, cross arms, a threephase transformer bank with cluster mount bracket, switches and a CT meter package. On June 10, 2006, the Company's Facility Representative provided Mr. Reid a formal work order estimate of $\$ 2505.82$ for removal of the three-phase facilities. A photograph showing the last of the four poles to be removed, including transformers, is attached as Exhibit 1. The work order cost information for the three-phase removal request is attached as Exhibit 2.

Idaho Power evaluated additional requests made by Mr. Stewart during Staff's second inquiry, including: 1) leaving the poles onsite for Mr. Stewart's use after Idaho Power removed its facilities, and 2) allowing Mr. Stewart's electrician to remove the poles. The Facility Representative indicated to Mr. Stewart that if he wanted the poles, the Company's crew would leave them on the site after removing them. The Company also reviewed the option of allowing Mr. Stewart to remove his own facilities, which is not authorized by the Company's tariffs. At the time of the second inquiry, the Company determined that it could not allow the customer to remove the Company's facilities because
of: 1) the safety, reliability and liability issues inherent in removing facilities, and 2) the existing Rule H Line Installation tariff, which does not provide for customer removal of Company-owned faciilities. Because the lines are currently energized, the Company would require a line crew to de-energize, ground and then remove facilities prior to any customer contact with the poles. In an attempt to resolve the additional issues raised by Mr. Stewart, the Company provided this information to Commission Staff and explained that for safety, reliability, and liability reasons the Company has always used its own personnel (or contractors under their control) to remove and salvage its facilities.

Staff's September 27, 2006 Decision Memorandum indicated that Mr. Stewart was unsatisfied with the outcome of the informal procedures to resolve his complaint. He informed Staff that he still wanted to pursue the option of removing the poles himself, and that he had oral bids from local electricians to remove the four poles for $\$ 100$ each. Mr. Stewart clarified that he wanted Idaho Power to disconnect the facilities from the Company's distribution system and sell the abandoned facilities to him, at which time he would be responsible for removing them. Mr. Stewart objects to the price the Company charges under its Rule H tariff to remove unused facilities and believes he can use less expensive equipment and personnel to complete the project. Because he believes the project does not require specialized equipment or personnel, Mr. Stewart proposes a transfer of responsibility and liability from the Company to him.

In response to Mr. Stewart's complaint, the Company investigated the individual cost of the items in the three-phase work order. (Exhibit 2). The quoted work order estimate, including removal of the four poles, was $\$ 2,505.82$. Without removal of the poles, the estimate is reduced to $\$ 2,112$. The $\$ 393.82$ difference is the amount the Company would charge for removal of all four poles, or $\$ 98.46$ per pole. The customer contends that removal of the four poles using his personnel and equipment would cost $\$ 100$ per pole.

This is approximately $\$ 1.50$ per pole more expensive than the Company's quote. Under this scenario, the Company would still be required to de-energize the line, ground it and remove the conductor and transformers from the poles. Thus, Idaho Power does not agree with Mr. Stewart's assertion in his September 7, 2006 Motion for Competitive Bidding that "a local contractor will remove the poles and lines for much less cost."

## COMPANY POSITION

The Company's tariff indicates that if a customer requests the removal of distribution facilities, the customer "will pay a nonrefundable charge equal to the work order cost." Rule H5.a. This approved tariff language allows Idaho Power to maintain control over the removal and salvage of its distribution facilities, thus minimizing safety, liability and system reliability issues inherent in their removal. Idaho Power does not believe it should deviate from the tariff on file with the Commission.

The work requested by Mr. Stewart is a substantial undertaking and the Company anticipates using a standard four person line crew to de-energize the lines and remove the facilities. The Company utilizes highly trained personnel and specialized equipment to safely complete such projects, and the work order costs reflect this. The large equipment needed for the job includes: a bucket truck to remove conductor from the pole, a linebed to remove the transformers from the pole and to hold the poles in place while they are pulled out of the ground, and a pole jack to pull the poles out.

When the Company hires contract crews for electrical and/or non-electric contact work, the Company requires the contract crews to meet or exceed the standards listed in the Company's General Conditions for Construction Services. The Company and its contractors carry liability and workers' compensation insurance, and follow Prudent Electrical Practices (defined as those practices, methods and equipment that are commonly used in prudent electrical engineering and operations to operate electric
equipment lawfully and with safety, dependability, efficiency and economy).

## SERVICE OF PROCESS

Service of pleadings and communications with reference to this case should be sent to the following:

Lisa Nordstrom<br>Barton L. Kline<br>Idaho Power Company<br>1221 W. Idaho Street<br>Boise, Idaho 83702<br>Inordstrom@idahopower.com<br>blkine@idahopower.com

Bic Gale
Celeste Schwendiman
Idaho Power Company
1221 W. Idaho Street
Boise, Idaho 83702
rgale@idahopower.com
cschwendiman@idahopower.com

## REQUESTED RELIEF

For the reasons stated above, Idaho Power requests that the Commission deny Mr.
Stewart's Complaint and allow the removal of distribution facilities to proceed in accordance with Idaho Power's approved tariffs.

Dated this
 day of October 2006.


## CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the $\nmid$ th and correct copy of the within and foregoing ANSWER upon the following named parties by the method indicated below, and addressed to the following:

## Donovan Walker

Idaho Public Utilities Commission
472 W. Washington Street
P.O. Box 83720

Boise, Idaho 83702
Reid Stewart
3100 W. 1000 S.
Aberdeen, ID 84318

X Hand Delivered
U.S. Mail

Overnight Mail
FAX
X Email: Donovan.walker@puc.idaho.gov
Hand Delivered
U.S. Mail

Overnight Mail
FAX
Email:


# IDAHO POWER COMPANY 

## CASE NO. IPC-E-06-25

Stewart v. Idaho Power Company

# CASE NO. IPC-E-06-25 

## IDAHO POWER CO.

 ANSWER TO REID
## STEWART COMPLAINT

## EXHIBIT 1 IS TOO DARK

TO SCAN

## IDAHO POWER COMPANY

## CASE NO. IPC-E-06-25

Stewart v. Idaho Power Company

EXHIBIT NO. 2

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