



LISA D. NORDSTROM
Attorney II

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IDAHO PUBLIC
UTILITIES COMMISSION

December 1, 2006

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

Re: Case No. IPC-E-06-30
In The Matter Of The Petition Of Idaho Power Company For
Approval A Permanent Exemption From Utility Customer Relations
Rule 201.03 As It Is Applied to Time-Variant Pricing

Dear Ms. Jewell:

Please find enclosed an original and seven (7) copies of Idaho Power Company's Petition 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,

Lisa D. Nordstrom

LDN:sh
Enclosures

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Attorneys for Idaho Power Company

Street Address for Express Mail:

1221 West Idaho Street
Boise, Idaho 83702

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF) CASE NO. IPC-E-06-30
IDAHO POWER COMPANY FOR A)
PERMANENT EXEMPTION FROM UTILITY) PETITION
CUSTOMER RELATIONS RULE 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 the Idaho Public Utilities Commission ("the Commission") issue an order granting Idaho Power a permanent exemption from Utility Customer Relations Rule ("UCRR") 201.03¹ as it applies to all current and future time-variant pricing services. Rule 201.03 requires that beginning and ending meter readings appear on customer billings. In support of this Petition, Idaho Power represents as follows:

¹ IDAPA 31.21.01.201.03

I.

Idaho Power currently has three tariff schedules with time-variant pricing based on usage data collected by Advanced Meter Reading ("AMR") systems. Schedule 19 is available to large commercial customers with metered demand of 1,000 kW or more per billing period. Schedules 4 and 5 are voluntary pilot programs² available to residential customers in the Emmett Valley until April 1, 2007.

In order to implement the time-variant pricing associated with Schedules 4, 5, and 19, Idaho Power uses meter data management systems ("MDMS") provided by a third-party vendor. The Company's MDMS have not been designed in a way that allows the beginning and ending meter readings to be displayed on customers' bills. Idaho Power does not believe it is the best use of resources to modify the systems to facilitate printing the beginning and ending meter readings on the monthly bills of those customers participating in the time-variant pricing options. However, Idaho Power can and currently does display the actual consumption by time block (e.g., on-peak, mid-peak, or off-peak) during the billing period on customers' bills.

II.

On July 27, 2005, in Order No. 29834 issued in Case No. IPC-E-05-19, the Commission granted the Company a limited waiver of Utility Customer Relations Rule 201.03 as it applies to the inclusion of the beginning and ending meter readings for time-variant pricing service on customers' bills under Schedules 4, 5, and 19. The Commission further ordered that the limited waiver shall expire on December 31, 2006. Idaho Power now seeks a permanent waiver or exemption from UCRR 201.03.

² The Energy Watch and Time-of-Day Pilot Programs, respectively.

III.

Since the introduction of Schedules 4 and 5 in June 2005, the Company has not received any inquiries from customers regarding beginning or ending monthly meter readings. The Company also has not received any inquiries from its Schedule 19 customers concerning beginning and ending meter readings since the introduction of time-of-use pricing in December 2004. Customer bills currently display the total metered energy consumption broken into time periods as well as the other data required by UCRR 201. If a dispute arises or if a customer requests details on meter readings, the Company's customer service representatives have access to the beginning and ending meter read information and can assist customers.

IV.

In order to cost-effectively accommodate the technological advances in meter reading and billing made possible by AMR, the Company requests the Commission grant a permanent exemption from UCRR 201.03 as it applies to the beginning and ending meter readings for time-variant pricing services utilizing meter data obtained through an AMR system. Such an exemption will allow the Company to make additional time-variant pricing services available in the future without requesting additional limited waivers.

V.

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.

VI.

Communications with reference to this Petition should be sent to the following:

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WHEREFORE, Idaho Power Company respectfully requests that the Commission issue an order granting a permanent exemption from UCRR 201.03 as it applies to the beginning and ending meter readings for all current and future time-variant pricing services utilizing meter data obtained through an AMR system.

DATED this 1st day of December, 2006.


LISA D. NORDSTROM
Attorney for Idaho Power Company