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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)
IDAHO POWER COMPANY FOR A) **CASE NO. IPC-E-06-30**
PERMANENT EXEMPTION FROM UTILITY)
CUSTOMER RELATIONS RULE 201.03 AS)
APPLIED TO TIME-VARIANT PRICING) **COMMENTS OF THE**
SERVICE.) **COMMISSION STAFF**
)

On December 1, 2006, Idaho Power Company filed a Petition requesting a permanent exemption from Utility Customer Relations Rule (UCRR) 201.03, IDAPA 31.21.01.201.03, as it applies to all current and future time-variant pricing services using meter data obtained through an Advanced Meter Reading (AMR) system. UCRR 201.03 requires that the beginning and ending meter readings appear on customer billings.

Idaho Power was previously granted a waiver of the requirements of UCRR 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. Order No. 29834. That waiver was scheduled to expire on December 31, 2006. *Id.* However, the Commission extended the previously granted temporary waiver while it considered the Company's request for a permanent exemption.

The Company requests a permanent exemption from the requirement of displaying the monthly beginning and ending meter readings in order to cost-effectively accommodate the technological advances in meter reading and billing made possible by AMR. It states that such an exemption will allow the Company to make additional time-variant pricing services available in the future without requesting additional limited waivers. Staff recommends that the Commission approve Idaho Power's request.

In Case No. IPC-E-05-19, the Commission Staff recommended that the Company be granted a temporary exemption in order to allow the company to evaluate its experience with time-variant pricing programs. Staff noted that the voluntary residential pilot programs associated with AMR (Schedules 4 and 5) were available only until April 6, 2006; these pilot programs have since been extended until April 1, 2007.

More customers will be affected by this rule exemption in the future as more time-variant pricing services become available to customers, but the current impact is limited to relatively few customers. At the present time, only large commercial customers served under Schedule 19 and a total of 150 residential customers served under Schedule 4 and 5 are affected. As of January 5, 2007, no comments had been filed with the Commission regarding this case. Since the exemption has been in effect, the Commission's Consumer Assistance Staff has received no inquiries or complaints about the lack of beginning and ending meter readings on affected customers' bills. Although meter readings are not printed on customers' bills, Staff notes that meter reading data is available. The Company has committed to provide this information to customers upon request.

Respectfully submitted this 8th day of January 2007.



Donovan E. Walker
Deputy Attorney General

Technical Staff: Beverly Barker

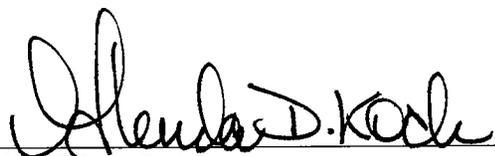
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 8TH DAY OF JANUARY 2007, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-06-30, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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