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IDAHO PUBLIC UTILITIES COMMISSION

Lisa D. Nordstrom
Attorney II

January 23, 2007

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-07-02
In The Matter of the Petition of Idaho Power Company for an
Exemption of Specific Accounts From the Company's Rule C
Provisions Regarding Aggregated Meter Reading

Dear Ms. Jewell:

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

LISA D. NORDSTROM ISB #5733
BARTON L. KLINE ISB #1526
Idaho Power Company
P. O. Box 70
Boise, Idaho 83707
Telephone No. (208) 388-5825
FAX Telephone No. (208) 388-6936
E-mail: lnordstrom@idahopower.com

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IDAHO PUBLIC
UTILITIES COMMISSION

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)
IDAHO POWER COMPANY FOR AN)
EXEMPTION OF SPECIFIC ACCOUNTS)
FROM THE COMPANY'S RULE C)
PROVISIONS REGARDING AGGREGATED)
METER READING)
_____)
CASE NO. IPC-E-07-02
PETITION

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 an exemption for specific accounts from the Company's Rule C provisions regarding aggregated meter reading. In support of this Petition, Idaho Power represents as follows:

I.

When Idaho Power delivers power to a customer with more than one delivery point or with multiple meters, the Company takes separate meter readings and

generally does not combine them. This practice conforms with Idaho Power's General Rules and Regulations, Rule C ¶ 6, which states:

Where separate Points of Delivery exist for supplying service to a Customer at a single Premises or separate meters are maintained for measurement of service to a Customer at a single Premises, the meter readings will not be combined or aggregated for any purpose except for determining if the Customer's total power requirements exceed 25,000 kW.

There are good reasons why Rule C prohibits aggregated meter readings, not the least of which is the additional complexity and infrastructure required to perform this function. Thus, the Company is not requesting these provisions in Rule C be removed or deleted. Rather, the Company requests an exemption from Rule C's aggregated meter reading provisions to allow bills for *specific* large accounts to be prepared by combining the readings from multiple meters. This would allow Idaho Power to best accommodate the electric requirements of some of the Company's larger customers, where multiple meters at the same premises are the most cost-effective and optimal means to design the distribution facilities necessary to provide the customer's requested level of service.

For example, a customer's energy load may be served by a dedicated substation with multiple feeders where the customer's energy needs exceed the maximum 10 MW limit of a typical feeder. Because each feeder requires a separate meter and the cost to install substation metering is substantial, the optimal solution is simply to meter each feeder individually and aggregate the meter readings.

A second situation in which multiple meters at the same premises can be the most cost-effective and optimal means of providing service is when the customer requests Alternate Distribution Service (Schedule 46). Depending on the configuration

under which alternate distribution service is provided, a customer may receive service from both a feeder metered at the substation and from a feeder metered at primary voltage. In this situation, the most economic means of providing service is to aggregate the meter readings for billing purposes.

A third situation in which multiple meters can be economic is when the feeder providing service to a large customer is taken out of service for maintenance and an alternate feeder is used temporarily to provide service during the maintenance period. Idaho Power's ability to aggregate these meter reads for billing purposes would avoid multiple monthly maximum demand charges.

II.

Idaho Power Company currently has 13 accounts that fall within one of the three scenarios explained above and where aggregated billing would provide the best, most cost-effective result. Therefore, the Company requests an exemption from aggregated meter reading provisions in Rule C ¶16 for the following accounts:

Amalgamated Sugar (Paul)

American Micro Systems (Pocatello)

Kinross Delamar (Murphy)

Lamb Weston (Twin Falls)

McCain Foodservice (Burley)

Micron Fab B (Nampa)

Micron Nano Fab (Boise – anticipated to be online 4/1/07)

Mountain Home Air Force Base (Mountain Home)

Irrigation Customers:

Grindstone Butte: Header 746, Pump 05s 09e 3403 (Glenns Ferry)

Grindstone Butte: Header 744, Pump 05s 09e 3405 (Glenns Ferry)

Farm Development Corp (Sailor Creek): Header 745,

Pump 05s 09e 3404 (Glenns Ferry)
Magic Water Corporation (Buhl)
West End Project (Melba)

III.

If and when other occasions arise when aggregated meter reading is determined to be electrically optimal, cost-effective and/or operationally required in order to provide the requested service to a customer, the Company requests the Commission authorize Idaho Power to forward the customer's name, city location, and an explanation of why aggregation is appropriate to the Commission for review without requiring the Company to file a separate Petition requesting an exemption. Unless the Commission has an objection, the customer would then be added to the list of customers exempt from Rule C as it is applied to aggregated meter readings.

IV.

The customers of the aforementioned accounts listed in Section II have received a letter and a personal contact from Idaho Power explaining the Company's intention to file this Petition seeking their exemption from Rule C's aggregated meter reading provisions. Each customer has been assured only their name and city location would be disclosed in this process, and no customer objected.

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:

Lisa D. Nordstrom
Barton L. Kline
Idaho Power Company
P. O. Box 70
Boise, ID 83707
lnordstrom@idahopower.com

Ric Gale
VP – Pricing & Regulatory
Idaho Power Company
P. O. Box 70
Boise, ID 83707
rgale@idahopower.com

WHEREFORE, Idaho Power Company respectfully requests that the Commission issue an order granting an exemption for specific accounts from the Company's Rule C regarding aggregated meter readings.

DATED this 23rd day of January, 2007.


LISA D. NORDSTROM
Attorney for Idaho Power Company