

DONOVAN E. WALKER
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0357
IDAHO BAR NO. 5921

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UTILITIES COMMISSION

Street Address for Express Mail:
472 W. WASHINGTON
BOISE, ID 83702-5983

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S PETITION FOR AN EXEMPTION)	CASE NO. IPC-E-07-2
OF SPECIFIC ACCOUNTS FROM THE)	
COMPANY'S RULE C PROVISIONS)	
REGARDING AGGREGATED METER)	COMMENTS OF THE
READING.)	COMMISSION STAFF
)	

The Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Donovan E. Walker, Deputy Attorney General, in response to Order No. 30244, the Notice of Application and Notice of Modified Procedure issued on February 14, 2007, respectfully submits the following comments.

BACKGROUND

On January 23, 2007, Idaho Power filed a Petition requesting an exemption for specific accounts from the Company's Rule C provisions regarding aggregated meter reading.

Idaho Power's Rule C states that where a customer has more than one delivery point or separate meters at a single premises, that 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. The Company requests an exemption from Rule C's aggregated meter reading provision to

allow bills for specific large accounts to be prepared by combining the readings from multiple meters. The Company states that this would allow it to best accommodate the electric requirements of some of its 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.

The Company states it currently has 13 accounts where aggregated billing would provide the best, most cost-effective service. Those accounts are:

- 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 Dev. Corp. (Sailor Creek): Header 745, Pump 05s 09e 3404 (Glenns Ferry)
- Magic Water Corp. (Buhl)
- West End Project (Melba)

The Company states that the customers of the above referenced accounts received a letter and a personal contact from Idaho Power explaining the Company's intention to file this Petition seeking an exemption from Rule C, and that no customer has objected.

The Company requests the Commission to authorize an abbreviated procedure in which it could add additional customers to the list of those exempt from Rule C's aggregated meter reading provisions. The Company requests that rather than filing separate petitions requesting exemptions that the Commission authorize it to forward the customer's name, city location, and an explanation of why aggregation is appropriate to the Commission for review. The Company proposes that unless the Commission has an objection, that the customer would then be added to the list of customers exempt from Rule C as it is applied to aggregated meter readings.

STAFF ANALYSIS

Staff has reviewed the Company's filing and finds the request to provide an exception from Rule C for these 13 specific accounts to be reasonable and appropriate. As explained in the Company's filing, there are valid technical and/or economic reasons for using multiple meters, rather than a single meter, for these customers, and aggregating the readings from these meters simply treats these customers as if they had a single meter. Under the current rate schedules, aggregating the readings does not impact the amount the customer is charged for the service provided.

However, Staff is concerned that under some rate structures that might be implemented by the Company in the future, specifically those that vary the amount of the charge for peak demand by time of use, aggregating the readings may impact the amount the customer is billed. In order to provide customers with the flexibility to respond to future rate changes, Staff recommends that customers affected by this change be able to request and receive separate billing if so desired.

Staff is comfortable with the Company using its judgment in identifying specific customers subject to the proposed rule exemption. Therefore, Staff does not oppose the abbreviated procedure proposed by the Company for future exemptions, provided that the customer agrees to the change and can at any time obtain separate billing.

STAFF RECOMMENDATION

Staff recommends the Commission approve the Company's request for an exemption to Rule C of the Company's tariff for the thirteen specific customers identified in the request. Staff also recommends approval of the abbreviated procedure proposed by the Company for future exemptions. Finally, Staff recommends that any customer affected by this change may request and receive separate billing if so desired.

Respectfully submitted this *7th* day of March 2007.



Donovan E. Walker
Deputy Attorney General

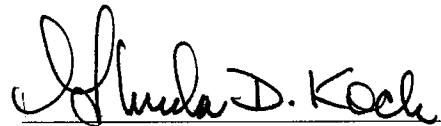
Technical Staff: Wayne Hart
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 7TH DAY OF MARCH 2007, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-07-2, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

BARTON L KLINE
LISA D NORDSTROM
IDAHO POWER COMPANY
PO BOX 70
BOISE ID 83707-0070

RIC GALE
VP – PRICING & REGULATORY
IDAHO POWER COMPANY
PO BOX 70
BOISE ID 83707-0070



SECRETARY