

## DECISION MEMORANDUM

**TO:** COMMISSIONER KJELLANDER  
COMMISSIONER REDFORD  
COMMISSIONER SMITH  
COMMISSION SECRETARY  
LEGAL  
WORKING FILE

**FROM:** KEITH HESSING

**DATE:** FEBRUARY 6, 2014

**RE:** PROPOSED EXEMPTION FROM IDAHO POWER'S RULE C TARIFF  
PROVISIONS REGARDING AGGREGATED METER READING  
PURSUANT TO CASE NO. IPC-E-07-02.

### BACKGROUND

Idaho Power's Rule C states that where a customer has more than one delivery point or separate meters 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 20,000 kW." In Case No. IPC-E-07-02, Order No. 30274, the Commission granted the Company 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. Each of the 13 accounts identified in that case involved situations where having multiple meters at the same premises was the most cost-effective and optimal means of providing service.

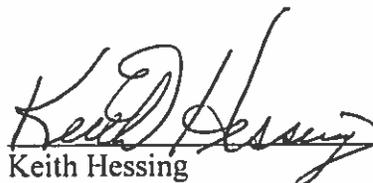
The Order also authorized a streamlined regulatory procedure for handling future situations where an exemption to Rule C was merited. Instead of requiring the Company to file a petition for each additional exemption, the Company was authorized to provide the Commission with information supporting its decision that an exemption was merited. Unless the Commission objected to a proposed exemption, the affected customer would then be added to the list of customers exempt from the Rule C provision.

Idaho Power now wishes to add Simplot's Caldwell facility to the list of Rule C exemptions. A new larger facility has been constructed on the premises, which replaced the previously existing facility. The new facility required the addition of a second feeder from a

substation dedicated to serving Simplot. Standard substation design required the feeders to be metered separately. This drives the request for a Rule C exemption. The Simplot Caldwell facility is currently a Schedule 19 customer but is expected to soon be a Special Contract Customer as its load grows to 20 MW. The Special Contract has been filed with the Commission in Case No. IPC-E-13-23 and is currently under review. When the Simplot Caldwell facility becomes a Special Contract Customer, the Rule C exemption will no longer be needed because the special contract will address the metering situation. Idaho Power's letter requesting the exemption is attached.

### **STAFF RECOMMENDATION**

Staff has no objection to Idaho Power's proposed Rule C exemption for the Simplot Caldwell facility and Staff recommends that the Commission accept Idaho Power's proposal to add the facility to the list of Rule C exemptions.

  
Keith Hessing

i:udmemos/IPC-E-07-02 Simplot Caldwell facility exemption doc

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IDAHO  
PUBLIC UTILITIES COMMISSION

**LISA D. NORDSTROM**  
Lead Counsel  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

December 31, 2013

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, Order No. 30274  
Exemption from the Company's Rule C Provisions Regarding Aggregated Meter Reading

Dear Ms. Jewell:

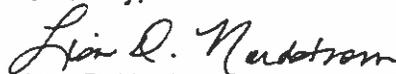
Pursuant to Order No. 30274 in Case No. IPC-E-07-02, Idaho Power Company ("Company") hereby requests to add an additional customer to the list of customers exempt from Rule C's aggregated meter reading provisions. As outlined in the abbreviated procedure approved by the Idaho Public Utilities Commission ("Commission") in Order No. 30274, the Company is providing the customer's name, city location, and an explanation of why aggregation is appropriate for review prior to aggregating meter readings. The Commission envisioned that the Commission Staff would notify the Commission if it has an objection to the customer proposed for aggregation. (Order No. 30274, p.3.)

The Simplot facility in Caldwell was previously served from a single 28.5 MVA transformer, and the output of the transformer was metered with one meter serving multiple feeders dedicated to Simplot. In response to plans for increased load that will qualify for a Special Contract, Idaho Power installed an additional 28.5 MVA transformer at the dedicated substation. Because each transformer requires a separate meter to facilitate independent operation, which is the standard substation configuration, the optimal solution is to aggregate the meter readings.

If the Simplot facility in Caldwell is granted an exemption, the Company will submit an updated list of Customers exempt from Rule C's aggregated meter reading provisions.

If you have any questions regarding this request, please contact Connie Aschenbrenner at 388-5994 or [caschenbrenner@idahopower.com](mailto:caschenbrenner@idahopower.com).

Sincerely,



Lisa D. Nordstrom

LDN:kkt

cc: Greg Sald  
Brent Lulloff  
Jake Perryman  
Jim Hovda  
RA File  
Legal File

ATTACHMENT  
K. HESSING, STAFF  
2/06/14