

## DECISION MEMORANDUM

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

IPC-E-08-10

**FROM:** BRYAN LANSPERY

**DATE:** APRIL 24, 2009

**RE:** COMPLIANCE FILING - REVISION TO RULE E.

On April 10, 2009, Idaho Power Company ("Company") filed its revision to Rule E, Master Metering Standards. Specifically, the Company added language to section 2b that states sub-metered tenants will be billed by the park operator at the rate specified under Schedule 3 - Master Metered Mobile Home Park Residential Service. The Company contends that the revision to the tariff sheet is necessary to comport with Commission Order No. 30754.

Staff has reviewed the Commission Order to confirm the Company's contention. According to the Commission Decision on the issue, a flat rate for Schedule 3 was approved, and that "[t]his is also the rate that master-metered customers should use when billing their tenants." *Order No. 30754, page 10.*

Rule 101.02 of the Idaho Public Utilities Commission Master Metering Rules, IDAPA 31.26.01, states that "[m]obile home parks sub-metered by the park operator must charge each of their tenants the same rate for electric service that a residential customer of the utility serving the park would charge the tenant if the tenant were directly metered and billed by the utility." Therefore without a waiver the Commission Order is in conflict with the Master Metering Rules. By virtue of the language in Commission Order No. 30754, Staff believes that the Commission implicitly determined that billing tenants under the three-tier residential rate structure would be impracticable, thus warranting a waiver to the current rules regarding master metering.

Under the proposed language, the park operators will bill their tenants at the rate outlined under Schedule 3. Staff notes that for residential master-metered mobile home parks, this is the same rate Idaho Power Company charges the park operator. For master-metered parks billed

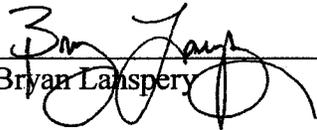
under commercial rate Schedules 7 or 9, the tenants will be billed under the flat rate defined in Schedule 3. Staff believes that granting a waiver and approving the Company's proposed modification to Schedule 3 complies with Commission Order No. 30754.

**STAFF RECOMMENDATION**

Staff believes that the revision to Rule E is necessary, and that the Company's proposal captures the spirit of the Commission Order. Staff recommends that the Commission grant a waiver to the Master Metering Rule 101.02, and accept the modification of Idaho Power Company's Rule E, to be effective on Commission approval.

**COMMISSION DECISION**

Does the Commission wish to grant a waiver to Rule 101.02 of its Master Metering Rules for Electric Utilities, and accept the revision to Rule E- Master Metering Standards proposed by Idaho Power Company?

  
Bryan Lanspery

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