DECISION MEMORANDUM

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WORKING FILE

FROM:SCOTT WOODBURY

DATE:MAY 8, 1996

RE:CASE NO.  IPC-E-96-7

REQUEST FOR EXEMPTION FROM MASTER-METERING RULES—

CROSSINGS CORPORATION

On April 17, 1996, Mr. Dennis L.  Rattie, Director of Development for Crossings Corporation (Crossings; Company), directed a letter (attached) to the Idaho Public Utilities Commission (Commission) requesting an exemption from Rule 102 of this Commission’s Master-Metering Rules for Electric Utilities.  Reference IDAPA 31.26.01.102.  Rule 102 provides:

102.  MASTER-METERING AND INDIVIDUAL METERING IN MULTI-OCCUPANT RESIDENTIAL BUILDINGS(Rule 102).

No multi-occupant residential buildings shall be master-metered after July 1, 1990, if the dwelling units for non-transient tenants contain an electric space heating, water heating, or air conditioning (space cooling) unit that is not centrally controlled and for which the dwelling unit’s tenants individually control electric usage.

Crossings has plans to initiate a second phase in its senior resident retirement center (River Place Senior Living Community) along Park Center Boulevard in Boise.  It will feature a 58-unit congregate living building as well as 20 cottage units along Logger’s Creek.  Crossings requests an exemption from the individual metering standards which would otherwise be applied to the congregate living building.  A similar exemption was granted in 1991 for the first phase of the project.  Reference Commission Order No. 23936, Case No.  IPC-E-91-21 (attached).  Crossings agrees that the proposed cottages maintain the relevant residential characteristics that would require independent metering.

Crossings maintains that the congregate structure should not be viewed as a residential project, only an institutional structure that presents residential characteristics.  The congregate structure will be a two-story facility featuring extensive life safety measures to allow its residents  to live an independent lifestyle in a controlled environment.  The general operating philosophy of Crossings is to provide as many amenities and services that will allow its residents to live in a more simple, worry-free environment.  Included in the standard rental package are meals, housekeeper, maintenance and all utilities (except telephone).  Crossings contends that master metering should not be required in a project of this nature, where utility costs will be covered in the fees paid by residents, and where the facility is designed to be energy efficient.

As reflected in Order No. 23936 “the primary reason that master-metering was prohibited was to encourage conservation by providing direct signals (through individual metering and billing) to consumers regarding their use.”  Crossings contends that because of facility design and operation, no economic or energy advantages would be realized through individual metering.

Crossings reports that the following energy conservation measures will be provided in construction:

•2" x 6"  exterior walls with R-19 batt insulation.

•Roof structures comprised of wood trusses with R-38 insulation.

•High efficiency vinyl framed windows with 1" insulated glass units.

•High efficiency composite doors with insulated cores.

•General use of florescent rather than incandescent bulbs.

Also, described by Crossings is the facility layout and energy using equipment.  Full architectural renderings accompany the filing.

On May 2, 1996, Idaho Power filed a letter with the Commission indicating its recommendation that the request  of Crossings for exemption be granted consistent and on the same terms as those established in Order No. 23936.  In its Order, the Commission granted an exemption subject to the following conditions:

a.  The exemption from the prohibition of master-metering applies only so long as the facility initially known as the RiverPlace Senior Living Community is used for assisted living or similar institutional type care-giving;

b.  The facility is constructed to meet the energy efficient design specifications of Idaho Power Company’s Design Excellence Award Program (DEAP); and

c.  The terms of this exemption are recorded at the Ada County Recorder’s office in a manner that would put any prospective purchaser of the facility on notice of the terms of the exemption.

Staff Analysis

Staff concurs with Crossings and Idaho Power.  The Commission has established precedent in Order No. 23936.  Staff recommends that the exemption be granted.  Staff contends that the public interest does not require the solicitation of comments through a Modified Procedure process.

Commission Decision

Crossings has requested an exemption from Rule 102 of the Commission’s Master Metering Rules for Electric Utilities.  Should the exemption be granted?  Should the exemption be granted on the same terms as those established in Order No. 23936?

Scott Woodbury

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