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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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| IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR AN ORDER AUTHORIZING THE UPDATING OF THE COMPANY’S GENERAL RULES AND REGULATIONS RELATING TO THE PRAIRIE SERVICE AREA. | ))))))) | CASE NO. IPC-E-98-3STAFF COMMENTS |

Pursuant to the Notice of Modified Procedure issued by the Commission in this case on March 3, 1998 the Staff of the Idaho Public Utilities Commission hereby submits the following comments in response to the Application of Idaho Power Company (Idaho Power; Company) for authority to update its general rules and regulations pertaining to the Company’s Prairie service area.

The Commission Staff has reviewed the proposed changes to Idaho Power’s Prairie service area tariff and the customer notice sent by Idaho Power to all those customers who would be affected by the proposed changes.  Idaho Power’s notice generally refers to revisions of the Company’s rules and regulations and notes that its Application before the Commission “seeks to bring nonreoccuring charges, such as those for reconnection fees, in line with those paid by the Company’s Idaho customers.”  There is no detailed disclosure, however, of the actual charges being proposed.  Nor does the notice mention that the policy and charges governing new service attachments and distribution line installation are also being revised to match those applicable to all other Idaho Power customers.

Although the Company’s Application does not propose to alter rates for electric service, adoption of the proposed tariff will add several new charges to the Prairie service area tariff as well as significantly change the currently applicable distribution line installation policy.  Staff believes, however, that the changes in the Company’s line installation policy will have relatively little impact on developers operating in the area who are familiar with Idaho Power’s line extension policies throughout the rest of the Company’s service area.

In the event that the Commission ultimately approves Idaho Power’s Application in this case, Staff recommends that the Company provide a more detailed notice to customers disclosing the new account initiation fee, field collection charge, and reconnection fee. The notice should also explain that the charges associated with new service attachment and distribution line installation have also changed.  A toll-free number should be provided so that customers can contact the Company for more information.  Staff notes that the Company has informally agreed to provide the foregoing proposed information to its Prairie service area customers.

In conclusion, Staff recommends approval of the Company’s Application subject to the customer notification recommendation made above.

DATED at Boise, Idaho this              day of March 1998.

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Deputy Attorney General

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