

BEFORE THE RECEIVED

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IDAHO PUBLIC UTILITIES COMMISSION

IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF )  
PACIFICORP DBA ROCKY MOUNTAIN )  
POWER FOR APPROVAL OF CHANGES )  
TO ITS ELECTRIC SERVICE SCHEDULES )  
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CASE NO. PAC-E-10-07

DIRECT TESTIMONY OF MARILYN PARKER

IDAHO PUBLIC UTILITIES COMMISSION

OCTOBER 14, 2010

1 Q. Please state your name and address for the  
2 record.

3 A. My name is Marilyn Parker. My business address  
4 is 472 West Washington Street, Boise, Idaho.

5 Q. By whom are you employed and in what capacity?

6 A. I am employed by the Idaho Public Utilities  
7 Commission as a Utilities Compliance Investigator. I  
8 accepted that position with the Consumer Assistance Staff  
9 in November 2002.

10 Q. What is your educational and professional  
11 background?

12 A. Prior to my employment with the Idaho Public  
13 Utilities Commission, I had twenty years experience  
14 working in private industry for three different utility  
15 companies. In 1973 and 1974, I was employed by Central  
16 Alaska Utilities, a water company in Anchorage, Alaska, as  
17 the Executive Secretary to the President of the company.  
18 From 1982 until 1987, I was employed as a Customer Service  
19 Representative for Idaho Power Company in Salmon, Idaho.  
20 From February 1989 until November 2002, I was employed by  
21 Intermountain Gas Company in Customer Services. During my  
22 last six years at Intermountain Gas, I supervised  
23 representatives at the Customer Service Center's Emergency  
24 Answering Service.

25 I received a Bachelor of Arts Degree in

1 Management and Organizational Leadership from George Fox  
2 University in Boise, Idaho in June of 2002.

3 In June 2003 and June 2006, I attended the  
4 National Low Income Energy Consortium Annual Conference in  
5 Sacramento, California and Washington, D.C., respectively.

6 Q. Have you previously testified before the  
7 Commission?

8 A. Yes, I have.

9 Q. What is the purpose of your testimony in this  
10 proceeding?

11 A. I will address the following topics: (1)  
12 customer comments received by the Idaho Public Utilities  
13 Commission regarding this case; (2) Rocky Mountain Power's  
14 (RMP) customer relations; (3) RMP's Landlord Program; (4)  
15 RMP's rebilling policy; and (5) RMP's policy of leaving  
16 meters on between customers and the resulting unbilled  
17 usage.

18 Q. Please summarize your testimony and  
19 recommendations to the Commission.

20 A. I reviewed customers' comments regarding the  
21 proposed rate increase. Customers are unhappy with the  
22 prospect of another rate hike, especially in light of the  
23 current economic conditions in eastern Idaho. I reviewed  
24 the Company's call center telephone answering statistics  
25 and found them to be commendable. Also notable is RMP's

1 relatively low number of customer complaints filed with  
2 the IPUC in 2009.

3 With respect to the Company's Landlord Program,  
4 I recommend that RMP review its policy of allowing  
5 landlords to submit applications for service to the  
6 Company on behalf of their tenants and report its findings  
7 to the Commission Staff no later than 60 days following  
8 issuance of the Commission's final order in this case.  
9 Staff also recommends that RMP retain the Application for  
10 Service form for a minimum of four years so that it will  
11 be available for review in the event there is a dispute  
12 later regarding responsibility for bill payment.

13 I discuss my concerns regarding RMP's procedures  
14 for rebilling customers whose meters failed or whose bills  
15 were prepared inaccurately. I make several  
16 recommendations to improve communication with customers  
17 and improve the accuracy of billing estimates. I also  
18 recommend that within 60 days of the final date of the  
19 Commission's order in this case, the Company meet with  
20 Staff to discuss how its rebilling policy can be revised.

21 I recommend that RMP discontinue its practice of  
22 routinely allowing service to remain connected between  
23 customers. I recommend that the Commission direct RMP to  
24 develop a policy that discourages energy waste, reduces  
25 unbilled revenue, improves billing accuracy by reducing

1 the number of estimated bills, and manages the Company's  
2 resources in a cost-effective manner.

3 **Customer Comments Regarding the Proposed Rate Increase**

4 Q. Have you reviewed the written customer comments  
5 that have been received by the Commission regarding this  
6 case?

7 A. Yes, as of September 29, 2010, 56 customers had  
8 commented on the case. More than one-half of those  
9 commenting were on the Time-of-Use (TOU) Schedule 36,  
10 which is a residential rate that allows customers to  
11 receive a lower rate when electric consumption is moved to  
12 "off peak" time periods. These TOU customers were upset  
13 because RMP is proposing to raise their rate by 15.6%,  
14 almost double the percentage increase proposed for  
15 residential rate Schedule 1. The perception by many of  
16 the TOU customers is that RMP was, for some reason,  
17 punishing them. One-half of those commenting also  
18 mentioned the bad timing of the requested rate increase  
19 and cited poor economic conditions as a reason that the  
20 increase in rates should be denied.

21 Many customers suggested that the utility needs  
22 to tighten its own belt first before asking its customers  
23 to pick up the extra money it needs. Other comments were  
24 from low and fixed income customers worried about another  
25 increase in rates and how they would be able to pay any

1 more money for electricity than they are already paying.

2 Q. Has the Staff considered the concerns expressed  
3 by customers?

4 A. Yes, the Staff shares the concerns expressed by  
5 customers regarding energy affordability, rate design, and  
6 the Company's efforts to control costs. Staff witnesses  
7 discuss reduction of Company expenses and investments to  
8 control cost and make energy more affordable. Staff also  
9 proposes modifications to revenue spread and rate design  
10 to better assure equity among customers.

11 **Customer Relations**

12 Q. What is RMP's current telephone Customer Service  
13 Level?

14 A. Customer Service Level is the percent of calls a  
15 utility answers within a specified length of time. RMP's  
16 service level goal is to answer 80% of its calls within 30  
17 seconds. This service level is one of the Customer  
18 Service Performance Standards established in PAC-E-04-07.  
19 RMP consistently has met or exceeded its performance  
20 targets over time. Since 2007, RMP has reached 85% or  
21 better in one-third of the months. It has averaged more  
22 than 80% in each year. In only one month in the past  
23 three years did RMP drop below 80%, and in that month  
24 (January 2007) RMP had a service level of 79%. Overall,  
25 in the past three years, RMP has maintained commendable

1 service levels.

2 Q. What were the total number of complaints and  
3 inquiries filed with the IPUC's Consumer Assistance Staff  
4 in 2009?

5 A. The Consumer Assistance Staff received 43  
6 complaints and 8 inquiries for a combined total of 51  
7 contacts with RMP's customers in 2009. Of the 43  
8 complaints received, two-thirds involved either credit and  
9 collection issues (e.g., deposits, disconnections, payment  
10 arrangements) or billing issues (e.g., high bills,  
11 rebilling, billing at the wrong rate, line item charges).

12 Q. How does this compare to prior years?

13 A. The number of complaints and inquiries decreased  
14 from 72 in 2008 to 51 in 2009. In 2007, there were 62  
15 complaints and inquiries and in 2006 there were 34. See  
16 Staff Exhibit No. 112.

17 Q. In 2009, how does RMP's total number of  
18 complaints and inquiries filed with the IPUC's Consumer  
19 Assistance Staff compare with other major regulated energy  
20 companies in Idaho?

21 A. On a per one-thousand customer basis, Rocky  
22 Mountain Power had the lowest number of complaints and  
23 inquiries. In three of the last four years, Rocky  
24 Mountain has had fewer complaints and inquiries than the  
25 other three companies. See Staff Exhibit No. 113.

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**Landlord Program**

Q. Please briefly describe RMP's Landlord Program.

A. RMP calls its program the "Landlord Interim Billing Agreement". When a landlord signs up for this program, the landlord can choose to have electric service at his or her rental properties transfer automatically into the landlord's name when a tenant discontinues service. In those situations, if the landlord has the Landlord Interim Billing Agreement in place, the electricity is not physically disconnected when the tenant moves out. At that point, the tenant's account is closed and a final bill is prepared for the tenant. The financial responsibility then transfers to the landlord on the date the tenant requested to be disconnected. From that point forward, the landlord is the responsible party for service until a new tenant moves in and assumes financial responsibility. There is no charge to the landlord for transferring service into or out of the landlord's name.

Q. What are the benefits of a Landlord Program?

A. For the landlord, the major benefit is that it protects the landlord's property from freezing if a tenant moves out and requests disconnection of service during the winter. Another benefit is that it allows electricity to

1 stay on between tenants, allowing landlords to clean and  
2 perform maintenance on the premises after a tenant has  
3 moved out and show the property to prospective tenants.

4 Q. Does Staff have any concerns regarding RMP's  
5 Landlord Program?

6 A. Yes. RMP allows landlords to obtain a tenant's  
7 Application for Service from the tenant and submit it by  
8 fax to RMP. Staff is concerned that RMP may not have  
9 proof in some situations that the tenant has granted  
10 permission to the landlord to submit billing and sign-up  
11 information on the tenant's behalf or that the information  
12 provided is accurate. Staff believes the best practice is  
13 one where the utility communicates directly with the  
14 person who will be financially responsible for the  
15 billing. Accepting Applications for Service from third  
16 parties is a questionable business practice. Staff is  
17 also concerned that RMP may not have adequate checks and  
18 balances in place to meet the requirements of the Federal  
19 Trade Commission's (FTC) "Red Flag Rule".

20 Q. What is the FTC's Red Flag Rule?

21 A. The FTC issued regulations (the Red Flag Rule)  
22 requiring financial institutions and creditors to develop  
23 and implement written identity theft prevention programs  
24 as part of the Fair and Accurate Credit Transactions Act  
25 of 2003. A program must provide for the identification,

1 detection, and response to patterns, practices or specific  
2 activities known as "red flags" that could indicate  
3 identity theft. The Red Flag Rule applies to creditors  
4 that defer payments for goods or services. Because  
5 utilities bill customers after services are provided, they  
6 are considered creditors.

7 Q. Does Staff have any recommendations regarding  
8 the Company's policy of accepting Applications for Service  
9 from landlords on behalf of tenants?

10 A. Yes. Staff recommends that the Company review  
11 its policy to make sure that the information it obtains  
12 from landlords is accurate and is provided with the full  
13 knowledge and permission of tenants as well as to insure  
14 compliance with the Red Flag Rule. The Company's findings  
15 should be reported to the Commission Staff no later than  
16 60 days following issuance of the Commission's final order  
17 in this case. Staff also recommends that RMP retain the  
18 Application for Service form for a minimum of four years  
19 so that it will be available for review in the event there  
20 is a dispute later regarding responsibility for bill  
21 payment.

22 **Rebilling in Accordance with the Idaho Public Utilities**  
23 **Commission's Utility Customer Relations Rule 204 (UCRR)**

24 Q. What concerns did Staff identify in its  
25 investigation of RMP's procedure to rebill its customers

1 when a customer's bill is prepared inaccurately due to  
2 reasons such as a meter malfunction or metering equipment  
3 that was incorrectly installed or programmed?

4 A. RMP does not follow an objective or  
5 independently verifiable methodology when preparing  
6 estimated bills. Its process entails using electric  
7 consumption at the premises from prior years to establish  
8 electric usage trends in its rebilling calculation. RMP  
9 does not apply a weather normalization factor based on  
10 Heating or Cooling Degree Days obtained from the National  
11 Weather Service. To come up with its estimate of the  
12 amount of electricity the customer used, RMP compares  
13 electric usage trends of other residents in the  
14 neighborhood during the same time period.

15 Q. Why does Staff believe the current method of  
16 rebilling employed by RMP is problematic?

17 A. Staff believes there are more accurate ways to  
18 prepare corrected billings. Both Avista Utilities and  
19 Intermountain Gas Company have implemented rebilling  
20 mechanisms that have been accepted by Commission Staff.  
21 Both Avista Utilities and Intermountain Gas employ in  
22 their methodologies, among other factors, the National  
23 Weather Service's Heating and Cooling Degree Days tailored  
24 to specific regions of their service territories. Unlike  
25 usage data gathered from a customer's neighbors, this

1 weather data is both objective and verifiable.

2 Q. Does RMP adequately communicate with customers  
3 whose meters malfunctioned and who will be rebilled?

4 A. No. RMP told Staff it informs those customers  
5 who will be rebilled by means of the customers' billing  
6 statements. However, it is Staff's opinion that the  
7 brief, non-descript message on the statement is not an  
8 acceptable explanation. The billing statement is usually  
9 the first notification the customer receives indicating  
10 that some of the previous months' bills have been wrong.  
11 RMP's current procedure is to print a brief message on the  
12 customer's bill stating that the customer should call RMP  
13 for an explanation of the added charges if the customer  
14 desires additional information. Staff Exhibit No.114 is a  
15 redacted copy of a customer's bill.

16 Q. What suggestions does Staff have for improving  
17 RMP's rebilling policy?

18 A. At a minimum, Staff recommends that each  
19 affected customer be sent a letter of explanation along  
20 with a spreadsheet comparing usage and dollars previously  
21 billed with the estimated usage and rebilled dollar  
22 amount. This information should be mailed out prior to  
23 the actual rebilling by the Company. This provides the  
24 customer an opportunity to contact the Company if there  
25 are any questions or disagreement with the usage estimate.

1 It also allows the Company to revise its estimate if  
2 necessary before the customer is actually billed, thereby  
3 avoiding the additional step of having to prepare a  
4 revised rebilling statement. Staff also recommends that  
5 the Company attempt to contact the customer by phone if  
6 the rebilling covers more than a three-month period or is  
7 for a significant dollar amount. This would allow the  
8 customer to discuss with the Company any unusual  
9 circumstances that might affect the rebilling. Currently,  
10 RMP calls the customer if the rebilled amount is more than  
11 \$10,000; Staff believes the threshold should be much  
12 lower.

13 Staff recommends that the letter of explanation  
14 make it clear to the customer that in accordance with UCRR  
15 204, payment arrangements are available for a period of  
16 time that may extend to the length of time that the  
17 underbilled amount accrued or the customer was not billed.

18 Staff recommends RMP meet with Staff within 60  
19 days from the date of the final order in this case to  
20 discuss development of acceptable policies with respect to  
21 estimating usage and rebilling.

22 **Unbilled Usage Due to Leaving Service Connected**

23 Q. What is RMP's policy regarding allowing service  
24 to remain connected between customers?

25 A. RMP does not routinely physically disconnect

1 service when a customer closes an account. As a result,  
2 energy continues to be used even though there is no  
3 customer to bill for that usage.

4 Q. What is RMP's justification for this policy?

5 A. RMP maintains that most premises are only vacant  
6 for a few days between customers. According to the  
7 Company, by not disconnecting service after a customer  
8 discontinues service, RMP saves the time of service  
9 technicians and vehicle mileage associated with having to  
10 disconnect and subsequently reconnect service within a  
11 relatively short period of time. From the Company's point  
12 of view, the dollar savings in employee time and vehicle  
13 mileage outweigh the lost revenue associated with the  
14 unbilled energy.

15 Q. What did Staff find in its investigation of this  
16 policy?

17 A. The presumed net benefit of RMP's policy of not  
18 disconnecting service may be more myth than fact. Staff  
19 found that in many instances, not much time and mileage,  
20 if any, was saved. The Company continues to send a  
21 technician to the premises monthly to read the meter.  
22 When unbilled usage at a premise exceeds 1,000 kWh, a  
23 technician is dispatched to disconnect the meter. In  
24 those instances where the threshold is reached, the  
25 Company does not save any time and mileage costs because a

1 technician eventually had to be dispatched to turn off the  
2 meter anyway, and a technician eventually would have been  
3 required to turn the meter back on when a new customer  
4 established service. Not only does RMP not save the time  
5 and mileage costs in those instances, it loses a  
6 considerable amount of revenue for electricity that went  
7 unbilled.

8 Q. Has RMP's threshold always been 1,000 kilowatt  
9 hours?

10 A. No. Until a few years ago, the threshold was  
11 400 kWh. This means that during a time period of  
12 increasing upward pressure on rates, the Company more than  
13 doubled the amount of energy and associated revenue it was  
14 willing to lose before taking action.

15 Q. How much energy goes unbilled due to RMP's  
16 policy?

17 A. In 2009, there were 835 instances where usage  
18 exceeded 1,000 kWh, meaning at least 835,000 kWh was  
19 unbilled. The majority of affected accounts were  
20 residential. At RMP's current average residential rate,  
21 that is a minimum retail loss in revenue of \$75,818. The  
22 Company did not identify how much additional energy was  
23 used in excess of the 1,000 kWh threshold before it  
24 actually disconnected service, nor did it provide the  
25 total amount of unbilled usage attributable to situations

1 where the 1,000 kWh threshold was not exceeded before a  
2 new customer signed up for service. Staff estimates that  
3 in excess of 1,000,000 kWh goes unbilled annually due to  
4 this policy. Based on the current average residential  
5 rate, more than \$90,000 in revenue was foregone by the  
6 Company in 2009.

7 Q. What other concerns were found regarding RMP's  
8 meter reading and billing policies as they pertain to  
9 leaving meters connected between customers?

10 A. Staff questioned RMP regarding the meter reading  
11 it uses for billing purposes when an account is opened and  
12 closed if a technician is not sent to the premises to  
13 obtain a meter reading. RMP stated that it uses the  
14 actual monthly cyclical meter reading obtained on the  
15 regular meter reading day to estimate a beginning or  
16 ending read when a customer requests connection or  
17 disconnection within five days of the regular monthly  
18 meter reading date. Affected customers are billed based  
19 on estimated rather than actual usage.

20 If a customer requests connection or  
21 disconnection outside of this ten day window (five days  
22 before or after a regular meter reading), RMP sends a  
23 technician out to obtain a reading. In other words, in 20  
24 out of 30 days in a billing cycle, there are no savings in  
25 employee time and vehicle mileage because an out-of-cycle

1 meter reading had to be obtained.

2 Q. Why is Staff concerned about this policy at this  
3 time?

4 A. When this policy was implemented, energy rates  
5 were lower than they are today and RMP was not capacity-  
6 constrained. Now, customers are constantly reminded about  
7 the importance of using energy wisely. RMP has a number  
8 of programs in place to encourage energy efficiency and  
9 conservation. RMP sends mixed messages to customers when  
10 it encourages conservation on one hand and on the other  
11 hand, leaves service connected when there is no customer  
12 paying for or beneficially using the energy being  
13 delivered to the premises. Staff recommends that the  
14 Commission direct RMP to develop a policy that discourages  
15 energy waste, reduces unbilled usage, improves billing  
16 accuracy by reducing the number of estimated bills, and  
17 manages the Company's workforce and equipment in a cost-  
18 effective manner. Staff is willing to work with the  
19 Company to devise an acceptable policy.

20 Q. Is Staff recommending that the Company  
21 immediately dispatch an employee to read a meter or  
22 disconnect service when a customer establishes or  
23 discontinues service?

24 A. No. The Company needs a reasonable length of  
25 time to respond to a customer's request. For residential

1 and small commercial customers, a work completion interval  
2 of up to three calendar days is reasonable in the majority  
3 of circumstances. An interval of up to five calendar days  
4 is reasonable for those situations where weather, the  
5 customer's remote location, or some other out-of-the-  
6 ordinary issue may delay work. For other types of  
7 customers, e.g., irrigation customers, a work completion  
8 interval of up to ten calendar days would be reasonable.  
9 Staff believes these intervals are realistic based on  
10 Idaho Power's reported success in using these same  
11 intervals to manage its performance.

12 Q. Does RMP employ any of the newer advanced meter  
13 reading technologies?

14 A. No. RMP has limited technical capability at  
15 this time. Currently, RMP has approximately 16,000  
16 residential and commercial meters that can be read by its  
17 meter readers with handheld devices. However, obtaining  
18 those meter readings still requires a meter reader to be  
19 near the meter to operate the electronic device.  
20 Approximately 57,000 meters in Idaho are still read by a  
21 meter reader standing in front of the meter.

22 Q. Would newer metering technologies solve some of  
23 the metering and billing issues raised by Staff?

24 A. Yes, many of the issues mentioned would be less  
25 problematic and in some cases eliminated with advanced

1 meter reading technologies. To Staff's knowledge,  
2 however, RMP has no immediate plans to upgrade its meters  
3 to allow for remote meter reading or remote disconnection  
4 and reconnection of service.

5 Q. If RMP is required to disconnect service within  
6 a reasonable interval after a customer discontinues  
7 service, won't this increase workload and expense to the  
8 Company?

9 A. As Staff pointed out earlier, the Company may  
10 not be saving as much time and money as it believes by  
11 leaving meters on between customers. To the extent that  
12 RMP's costs do increase, there are ways in which the  
13 Company can recover at least a portion of its costs  
14 directly from customers who are causing those costs.

15 Both Idaho Power and Intermountain Gas assess an  
16 account initiation fee when a new account is opened to  
17 help cover the costs associated with connecting and  
18 disconnecting meters. Currently, RMP customers are not  
19 charged an account initiation fee if an account is opened  
20 during regular working hours. Based on the total number  
21 of RMP accounts opened in 2009, which includes accounts  
22 that required an actual connection of the meter as well as  
23 those accounts that did not require an actual meter  
24 connection but required a reading or estimated reading to  
25 complete the transfer of service, the Company would have

1 received approximately \$288,000 in additional revenue if  
2 it had in place a \$20 account initiation fee.

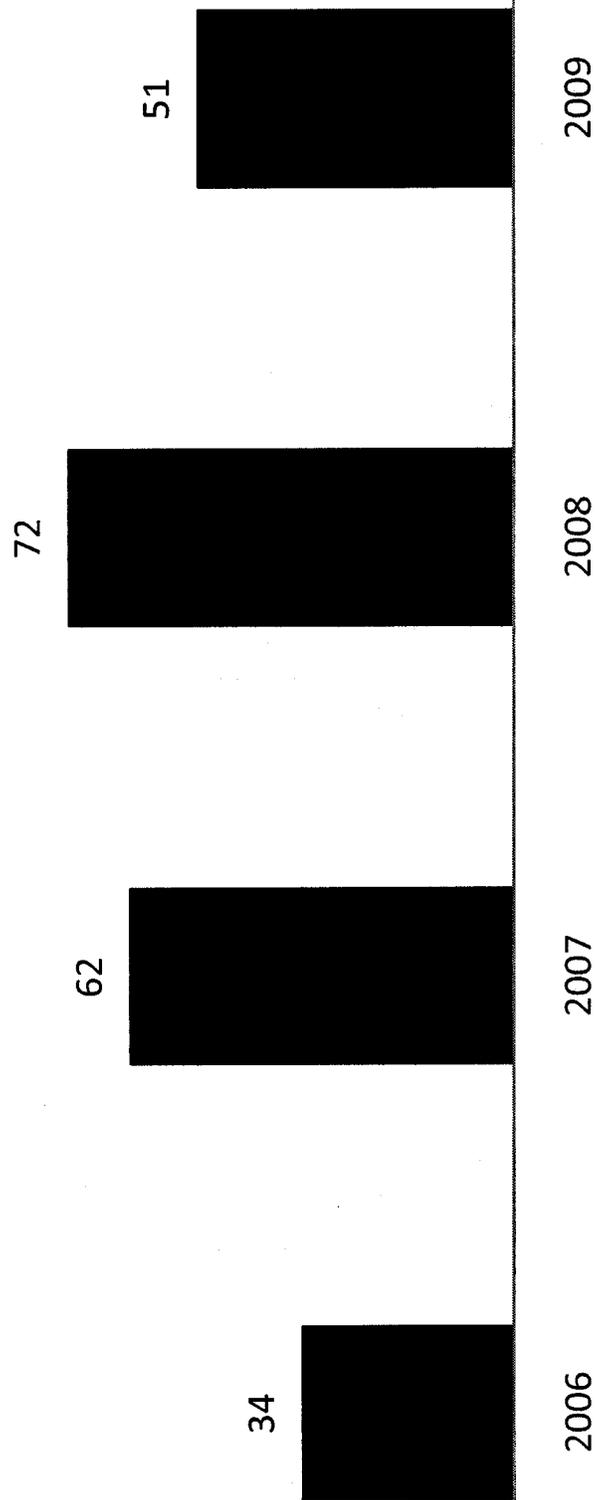
3 Q. What do the other regulated gas and electric  
4 companies in Idaho charge residential customers to open an  
5 account?

6 A. Idaho Power's fee is \$20 for accounts initiated  
7 during working hours and Intermountain's fee is \$14 for  
8 accounts opened during regular office hours. Avista  
9 Utilities is currently considering implementation of such  
10 a charge.

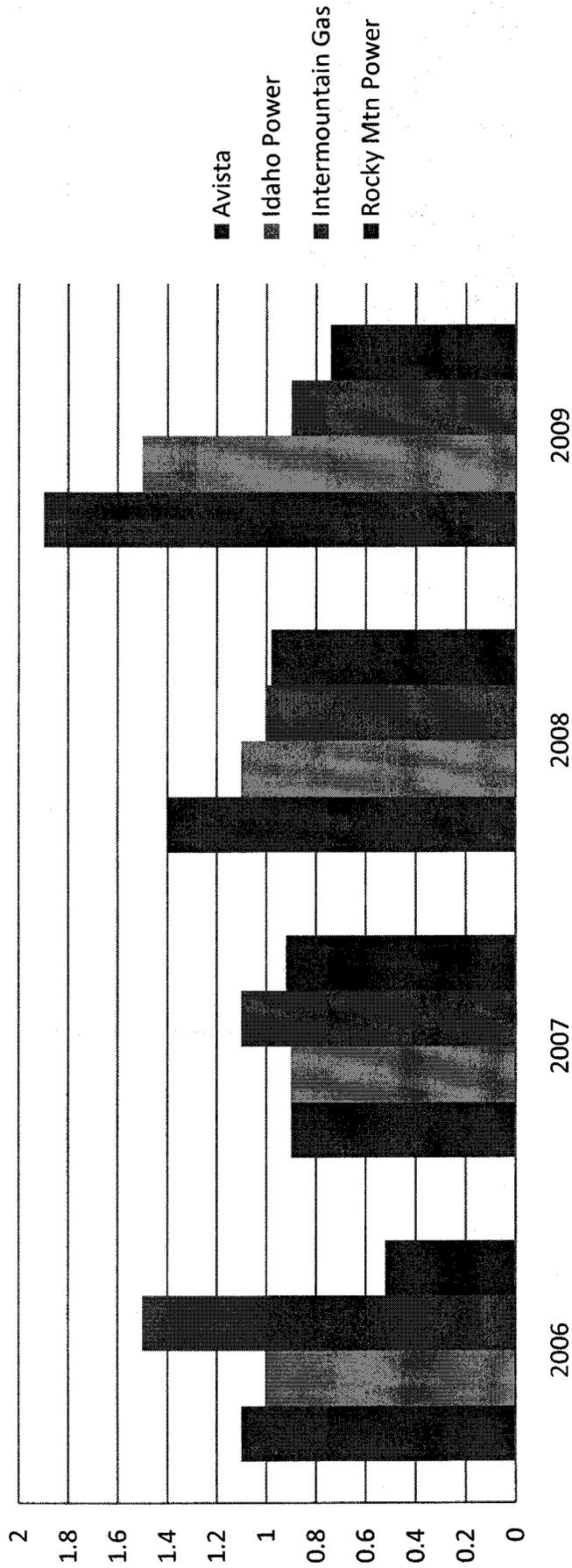
11 Q. Does this conclude your direct testimony in this  
12 proceeding?

13 A. Yes, it does.  
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# Rocky Mtn Power Complaints and Inquiries 2006 - 2009



## Complaints & Inquiries by Company on a per 1000 Customer Basis (2006-2009)



**ROCKY MOUNTAIN  
POWER**

[REDACTED]

Questions about your bill: 1-888-221-7070  
Call toll free 24 hours a day, 7 days a week  
www.rockymtnpower.net

BILLING DATE: Nov 30, 2009  
ACCOUNT NUMBER: [REDACTED]  
DATE DUE: Dec 15, 2009  
AMOUNT DUE: \$199.02

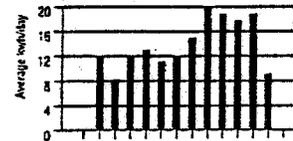
**Your Balance With Us**

Previous Account Balance	40.81
Payments/Credits	-40.81
New Charges	+23.47
Adjustments	+175.55
<b>Current Account Balance</b>	<b>\$ 199.02</b>

**Payments Received**

DATE	DESCRIPTION	AMOUNT
Nov 12, 2009	Payment Received - Thank you	40.81
<b>Total Payments</b>		<b>\$ 40.81</b>

**Historical Data - ITEM 3**



2008 N O D J F M A M J J A S O N 2009

**Your Average Daily kWh Usage by Month**

PERIOD ENDING	NOV 2009	NOV 2008
Avg. Daily Temp.	0	0
Total kWh	269	0
Avg. kWh per Day	9	0
Cost per Day	\$0.78	\$0.00

**NOTE:** One or more of your services has been adjusted. If you would like more information or have any questions, please call us anytime toll free at 1-888-221-7070.

**Detailed Account Activity**

**ITEM 3 - ELECTRIC SERVICE**

[REDACTED] ID  
Residential Schedule 1

METER NUMBER	SERVICE PERIOD From To	ELAPSED DAYS	METER READINGS Previous Current	METER MULTIPLIER	AMOUNT USED THIS MONTH
[REDACTED]	Oct 26, 2009 Nov 25, 2009	30	7230 7499	1.0	269 kWh

Next scheduled read date: 12-29. Date may vary due to scheduling or weather.

NEW CHARGES - 11/09	UNITS	COST PER UNIT	CHARGE
Energy Charge for 5 day(s) Summer	45 kWh	0.1040930	4.68
for 25 day(s) Winter	224 kWh	0.0801500	17.95
Customer Efficiency Services		0.0372000	0.84
<b>Total New Charges</b>			<b>23.47</b>

ADJUSTMENTS	CHARGE
01/09 Meter Information Corrected 01/02/09 - 01/28/09	-25.53

See reverse

Write account number on check & mail to: Rocky Mtn Power, 1033 NE 6th Ave, Portland, OR 97256-0001

RETAIN THIS PORTION FOR YOUR RECORDS.  
RETURN THIS PORTION WITH YOUR PAYMENT.

**ROCKY MOUNTAIN  
POWER**  
PO BOX 25308  
SALT LAKE CITY UT 84125

WRITE ACCOUNT NUMBER  
ON CHECK & MAIL TO:

ROCKY MTN POWER  
1033 NE 6TH AVE  
PORTLAND OR  
97256-0001

0.000 0-0

[REDACTED]

**Late Payment Charge for Idaho**  
A late payment charge of 1% may be charged on the delinquent balance per month.

Change of Mailing Address or Phone?  
Check here & provide information on back.

Account Number: [REDACTED]  
Date Due: Dec 15, 2009

AMOUNT DUE: \$199.02

Please enter the amount enclosed.

Questions about your bill:  
Call toll free 1-888-221-7070

Exhibit No. 114  
Case No. PAC-E-10-07  
M. Parker, Staff  
10/14/10 Page 1 of 2



Questions about your bill: Call toll free 1-888-221-7070 www.rockymtnpower.net

BILLING DATE: Nov 30, 2009 ACCOUNT NUMBER: [REDACTED] DATE DUE: Dec 15, 2009 AMOUNT DUE: \$199.02

ADJUSTMENTS - / CONTINUED	UNITS	COST PER UNITS	CHARGE
02/09 Meter Information Corrected 01/28/09 - 02/26/09			-12.91
03/09 Meter Information Corrected 02/26/09 - 03/27/09			-5.93
04/09 Meter Information Corrected 03/27/09 - 04/27/09			6.57
05/09 Meter Information Corrected 04/27/09 - 05/27/09			27.77
06/09 Meter Information Corrected 05/27/09 - 06/25/09			35.39
07/09 Meter Information Corrected 06/25/09 - 07/28/09			61.95
08/09 Meter Information Corrected 07/28/09 - 08/26/09			40.27
09/09 Meter Information Corrected 08/26/09 - 09/25/09			23.10
10/09 Meter Information Corrected 09/25/09 - 10/25/09			22.78
12/08 Meter Information Corrected 12/08/08 - 01/02/09			2.09
<b>Total Adjustments</b>			<b>175.55</b>

When you provide a check as payment, you authorize us to use the information from your check either to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment and you will not receive your check back from your financial institution. If you would like to opt out of this program and continue processing your payment as a check transaction, please call anytime toll free at 1-800-895-0561. If you have opted out previously, please disregard this message.

Looking for other ways to pay?

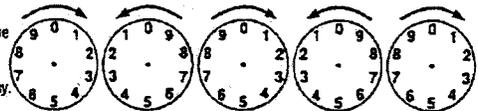
Pay online! Register a new Web account at www.rockymountainpower.net to access new features and our online payment program. Or, for a fee, pay by phone with a check, credit or debit card by calling 1-800-672-2405.

New Mailing Address or Phone?

Please print your new information below and check the box on the reverse side of this Payment Stub. Thank you.

ACCOUNT NUMBER: 60913700-001 2

If you feel your meter read is incorrect, draw lines where the hands appear on the dials or for digital meters record the numbers shown on the display.



LAST

FIRST

M.I.

NEW STREET ADDRESS

CITY

ST

ZIP

TELEPHONE NUMBER

Exhibit No. 114  
Case No. PAC-E-10-07  
M. Parker, Staff  
10/14/10 Page 2 of 2

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 14<sup>TH</sup> DAY OF OCTOBER 2010, SERVED THE FOREGOING **DIRECT TESTIMONY OF MARILYN PARKER**, IN CASE NO. PAC-E-10-07, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

TED WESTON  
ID REGULATORY AFFAIRS MANAGER  
ROCKY MOUNTAIN POWER  
201 S MAIN ST STE 2300  
SALT LAKE CITY UT 84111  
(FED EX)  
E-MAIL: [ted.weston@pacificorp.com](mailto:ted.weston@pacificorp.com)

**E-MAIL: ONLY**

MARK C MOENCH  
DANIEL E SOLANDER  
ROCKY MOUNTAIN POWER  
E-MAIL: [mark.moench@pacificorp.com](mailto:mark.moench@pacificorp.com)  
[daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)

RANDALL C BUDGE  
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BRUBAKER & ASSOCIATES  
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SECRETARY