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IDAHO PUBLIC
UTILITIES COMMISSION

101 S. Capitol Boulevard, Suite 1900
Boise, Idaho 83702
main 208.389.9000
fax 208.389.9040
www.stoel.com

February 16, 2012

RICHARD R. HALL
Direct (208) 387-4211
rrhall@stoel.com

BY HAND DELIVERY

Idaho Public Utilities Commission Staff
472 W. Washington
Boise, Idaho 83702
Attn: Jean Jewell

**Re: Idaho Public Utilities Commission Staff v. PacifiCorp
Case No. PAC-E-12-01**

Dear Jean:

On January 31, 2012, Rocky Mountain Power filed PacifiCorp's Answer, Affirmative Defenses and Motion to Dismiss in the above captioned case. We failed to properly mark Confidential Attachment E to this pleading in this filing.

Enclosed please the Response we filed yesterday with all attachments, A thru F, properly marked. Please note that Confidential Attachment E was not marked confidential on the Answer filed in January.

Thank you for your assistance in this matter and please do not hesitate to contact me.

Best regards,

A handwritten signature in cursive script that reads "Richard R. Hall".

Richard R. Hall

RRH:ct
Enclosure

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IDAHO PUBLIC UTILITIES COMMISSION

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Barbara.Ishimatsu@PacifiCorp.com

Attorney for Rocky Mountain Power

BEFORE THE PUBLIC UTILITIES COMMISSION STATE OF IDAHO

**IDAHO PUBLIC UTILITIES
COMMISSION STAFF IN RE: THE
MATTER OF IDAHO TRAVERTINE
CORP.,**

Complainant,

vs.

**PACIFICORP,
d/b/a ROCKY MOUNTAIN POWER,**

Respondent.

:
:
:
: **Case No. PAC-E-12-01**
:
:
: **PACIFICORP'S RESPONSE TO**
: **COMMISSION STAFF REPLY**
:
:
:

COMES NOW, PacifiCorp, d/b/a Rocky Mountain Power ("Rocky Mountain Power" or the "Company"), by and through its attorneys and in response to the Commission Staff's ("Staff") Reply to Rocky Mountain Power's Answer to the Commission Staff Complaint

filed January 31, 2012, in Case No. PAC-E-12-01, submits the following response with supplemental information for the Commission's consideration of this matter.

Staff alleges that Rocky Mountain Power violated Rule 203 of the Utility customer Relations Rules by billing Idaho Travertine under an inappropriate rate schedule. Both parties agree, "Idaho Travertine is eligible to receive service under"¹ Electric Service Schedule ("Schedule" or "Rate") 6 and Schedule 23. However, a customer simply being eligible for more than one schedule and then being billed on a schedule which, in hindsight, turns out to be less favorable does not constitute a violation of Rule 203. Staff must show that Idaho Travertine was "billed under a schedule contrary to the customer's election", or "the election was based on erroneous information provided by the utility." IDAPA31.21.01.203.01.c.

In this instance, Idaho Travertine elected Schedule 6. Idaho Travertine contacted Rocky Mountain Power to transfer service from the existing account holder. Based on this information, the Company determined the account at that location was previously billed under Schedule 6 but also qualified for Schedule 23. Depending on the customer's circumstances, if it qualified for the Regional Power Act credit under Schedule 34, it could also qualify for service under Schedule 6A. In addition, if the customer desired to receive service under a time of day rate, Schedule 35 would have been appropriate. A mock-up for demonstrative purposes illustrating the next step in the customer set-up process is provided in **Confidential Attachment F**, whereby the Company informs the customer:

The default Schedule for this service is based on how much power you use regardless of when usage occurs. This service is eligible for optional rate billing based on the time of day you use your power as well as how much power you use. Would you like more information regarding optional rates or would you prefer our default billing?

¹ Commission Staff Reply, page 3.

At that point, the Customer's response is necessary prior to completing the new account set-up. The computerized process requires the selection of one of two radio buttons for telephone customers, "Default Schedule" or "Optional Schedule". The account cannot be finalized unless the customer elects one choice or the other. The record shown in **Confidential Attachment E** to PacifiCorp's Answer, Affirmative Defenses and Motion to Dismiss, is an excerpt from the Company's actual records of the set-up process for Idaho Travertine indicating that Idaho Travertine declined to receive information about optional Schedules on April 13, 2010, meaning that the "Default Schedule" radio button was selected during the set-up process. Idaho Travertine was not passively assigned to Schedule 6 but was assigned to a schedule consistent with the customer's request to "transfer" service from a prior account and with its confirmation of the "Default Rate" on April 13, 2010.

Staff contends that "but for an omission by Rocky Mountain Power in failing to switch Idaho Travertine to the appropriate schedule, the succeeding customer (Rocky Mountain Travertine) would have automatically been assigned to Schedule 23."² This is an assertion without evidence and contrary to a customer's rights under Electric Service Regulation No. 3 to use any applicable Schedule, which could be Schedule 6 or 6A, Schedule 23 or 23A, or Schedule 35. There is simply no evidence that Rocky Mountain Travertine did not consciously elect Schedule 6 and it is inappropriate for Staff to make assumptions about a non-party's decisions.

Staff maintains that Rocky Mountain Power "arbitrarily" assigned Idaho Travertine to Schedule 6 on April 14, 2010. Idaho law defines an arbitrary decision as one "made without a rational basis, or in disregard of the facts and circumstances, or without adequate determining principles." Lane Ranch Partnership v. City of Sun Valley, 175 P.3d 776, 780

² Commission Staff Reply, page 4

(Idaho 2007). Clearly, the account set-up process outlined above is based on the guiding principles of a scripted interview. The Company had a rational basis that considered the actual circumstances because the assignment requires the customer to qualify for a particular Schedule and then consent to the “default rate” or the “optional rate.”

Even if the requirements of Rule 203.01.c were met, Staff does not consider the exception in Rule 203.02:

Exceptions. The utility shall not be required to adjust billings when it has acted in good faith based upon available information or when the customer was given **written notice of options** under the tariff schedules and **did not make a timely election to exercise available options.** (emphasis added)

Rocky Mountain Power’s actions fall squarely within both exceptions. Rocky Mountain Power acted in good faith based upon Idaho Travertine’s verbal assent to be billed on the “Default Rate” when the account in question was established April 13, 2010. Furthermore, Rocky Mountain Power provided written notice of optional Schedules on Idaho Travertine’s first bill May 12, 2010 (**Confidential Attachment A** to PacifiCorp’s Answer, Affirmative Defenses and Motion to Dismiss), in the new customer welcome letter sent in May 2010 (**Attachment B** to PacifiCorp’s Answer, Affirmative Defenses and Motion to Dismiss), and the annual Consumer Information disclosure mailed in December 2010 (**Attachment D** to PacifiCorp’s Answer, Affirmative Defenses and Motion to Dismiss). The Company provided at least three written notices of available options in the seven months after Idaho Travertine established its account. In November 2011, eighteen months after the first notice, Idaho Travertine filed an informal complaint with the Commission alleging that the account should have been placed on Schedule 23.

An eighteen-month delay is not a “timely” election. What constitutes a reasonable time to exercise an option of unspecified duration “is usually an implication of fact, and not of law, derivable from the language used by the parties considered in the context of the

subject matter and the attendant circumstances, in aid of the apparent intention.” 60 AMJUR POF 3d 255. In the instant case, the Commission should look to the language of Electric Service Regulation No. 3 to determine what is a reasonable time for election of an optional Schedule, “[t]he Company will bill the Customer under such elected Schedule from and after the date of the next meter reading.” In this context, a reasonable time to select a different Schedule is one billing period. A customer cannot reasonably elect an optional Schedule for a prior billing period. Otherwise, the protection against backbilling under Electric Service Regulation No. 3 and Rule 203.02 is meaningless. According to Company records, Idaho Travertine never contacted Rocky Mountain Power to elect another Schedule for the account established April 13, 2010 until filing its informal complaint. Thus, because Idaho Travertine waited eighteen months from the first written notice before electing to change to Schedule 23, Rule 203 does not require Rocky Mountain Power to adjust Idaho Travertine’s account as though it were on Schedule 23 from April 13, 2010 because the exception in Rule 203.02 applies.

Staff contends that Rocky Mountain Power “should utilize specific criteria when setting up a new customer account that assesses usage characteristics to assist the customer in determining an appropriate tariff.” Referring again to the script in **Confidential Attachment F**, Rocky Mountain Power offered to do just that when it informed Idaho Travertine the account was “eligible for optional rate billing based on the time of day you use your power as well as how much power you use.” When choosing between cell phone plans that offer unlimited minutes or specified minutes with free nights and weekends, a customer must assesses his individual estimates of use based on time of day and call duration which may or may not be comparable to the last person having that phone number, the last person at that residence, or even other family members on the same account. Likewise, when establishing

an account with Rocky Mountain Power, a customer needs to provide its own estimates of the time of day and volume of power and energy to be used.

Rocky Mountain Power had no way of knowing Idaho Travertine's business plan. Staff acknowledges the Company would not provide a prior customer's billing history to a new customer based on privacy concerns³ then inexplicably asserts that if the prior customer's billing history had been reviewed by the Company "it would have been obvious to the Company that Schedule 6 was not the most advantageous rate schedule."⁴ First, the prior customer's historical usage may have very little or no relevance to the current customer's operation or usage patterns, nor is it part of the evidence in this case, so Staff's assertion is unfounded. Secondly, under the Company's customer privacy policy⁵, a previous customer's usage statistics would not be provided unless the new customer obtained express consent from the prior customer. If Idaho Travertine's use had been based on Rocky Mountain Power's data and billed on a schedule which later turned out to be less beneficial, Rocky Mountain Power could easily be facing a complaint from Idaho Travertine that Rocky Mountain Power arbitrarily assigned it to a rate schedule based on facts and circumstances of another customer rather than on the facts and circumstances unique to Idaho Travertine's operation of its business. Lastly, Rocky Mountain Power offered to perform an analysis based on Idaho Travertine's individual usage forecast when it established the account on April 13, 2010, yet Idaho Travertine declined.

³ Commission Staff Reply, page 4.

⁴ Id.

⁵ "[A]ccess of [account] information is strictly limited to those uses necessary to conduct the business of servicing your accounts and agreements with the company." Rocky Mountain Power Privacy Practices, available at <http://www.rockymountainpower.net/footer/privacy.html>

Staff contends that all customers on Schedule 6 and Schedule 23 “ought to be reviewed annually to verify those customers are assigned to the appropriate schedule” based on the annual reviews performed for managed accounts as discussed in Production Request No. 10 in Case No. PAC-E-08-07.⁶ As noted in that Request, the Company only makes proactive annual reviews for its large managed accounts. Imposing an annual review of non-managed commercial and industrial customers would be overly burdensome and would not be cost-effective. Based on a review of the approximately 8200 accounts on Schedule 23 and 23A, 37% of those customers do not have demand meters making it impossible to calculate a comparison against Schedule 6.

As a compromise in settlement of this Complaint, Rocky Mountain Power is willing to add tools on its website to facilitate any customer making a comparison between Schedule 6 and Schedule 23 based on past use. The Company would also be willing to include an annual bill message for customers billed on Schedule 6 to notify them of this tool and remind them the Company will perform a rate comparison of historical use upon request. However, no recommended changes would occur until the customer complies with Electric Service Schedule No. 3 by submitting a written request to change and the Company would then implement the new Schedule as of the next billing period.

While there may be room for improvements to the rate schedules and eligibility criteria, a complaint proceeding should not be the platform for changes that benefit or could be to the detriment of many others not involved in this dispute. A general rate case is the appropriate forum to negotiate rate design. Other customers’ alleged ignorance of optional rate schedules is not at issue here; Idaho Travertine clearly knew of the existence of Schedule 23 based on its 1997 informal complaint.

⁶ Commission Staff Reply, page 5.

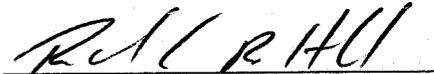
In summary, Rocky Mountain Power's statements about the availability of optional rates are not "passive" but instead require a positive confirmation from the customer declining information about other rates based on time of day or quantities. Rocky Mountain Power appropriately assigned Idaho Travertine to Schedule 6 consistent with the Customer's request to "transfer" service from Rocky Mountain Travertine, the Customer's confirmation to be billed under the "Default Rate" during the set-up process, and the Customer's failure to make a timely election of a different Schedule.

WHEREFORE, Rocky Mountain Power respectfully requests the Commission accept this supplemental information, reject the claims made by Staff, and find that Rocky Mountain Power does not owe Idaho Travertine a refund of \$15,952.31.

Dated this 16th day of February 2012,

Respectfully submitted,

ROCKY MOUNTAIN POWER,



Richard R. Hall
Local Counsel
Stoel Rives LLP
101 S. Capitol Boulevard, Suite 1900
Boise, ID 83702-7705
Phone: (208) 389-9000
Fax: (208) 389-9040

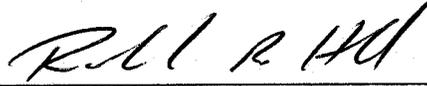
Daniel E. Solander
Barbara Ishimatsu
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, Utah 84111
Telephone No. (801) 220-4014
Facsimile No. (801) 220-3299

Attorneys for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of February, 2012, I caused to be served, via hand delivery, a true and correct copy of PacifiCorp's Response To Commission's Staff Reply in case No. PAC-E-12-01 to the following:

Idaho Public Utilities Commission Staff
472 W. Washington
Boise, Idaho 83702



Richard R. Hall

Attachment B

Attachment B



201 South Main
Salt Lake City, Utah 84111

Arco ID 83213-0697



Dear

We're glad to have you on board as a Rocky Mountain Power customer. Our priority is providing your business with safe, reliable power and excellent customer service to help you achieve your goals.

To get you started, we've enclosed our Business Customer Care Guide. In it you'll find information on our Business Solutions team, our specially trained experts who can assist customers like you and help you manage your account the way you like. Our streamlined call menu gives you quick access to these specialists, who can help you with billing, energy efficiency and more.

This guide also gives you information on:

- programs and incentives we offer to help you use energy wisely and manage costs, as well as easy energy efficiency tips;
- our online Business Solutions Toolkit;
- our payment options – choose the most convenient option for your business;
- our award-winning Blue SkySM renewable energy program; and
- your rights and responsibilities as an energy consumer, so you get the best possible service.

For your reference, we've included important price information on the back of this letter. Pricing for your business is listed under **Schedule 6**.

We want to make it easy to do business with us. If you have any questions, please call our Business Solutions team toll free at 1-866-870-3419 or visit rockymountainpower.net/business.

If you would like to sign up to receive our quarterly e-mail newsletter, *energy connections*, with updates on energy efficiency, payment and other services we offer or need further assistance, please send us a message at rockymountainpower.net/contact.

Are there others in your organization who may have the opportunity to interact with us? Please pass this information on to them.

We're looking forward to serving you.

Sincerely,

A handwritten signature in cursive script that reads "Karen Gilmore".

Karen Gilmore
Vice President, Customer Services

our true strength is
our connection to you

We're working to keep your prices down as energy use grows

Delivering safe, reliable, low-cost power is a responsibility we take seriously. We work to keep prices down by lowering our operating costs and improving how we do business.

To meet the growing demand for electricity, we're building new lines, substations and power plants as well as continuing

to invest in maintaining the existing electric system.

You can see how your rates compare to other states at rockymountainpower.net/busmap. And you can get information on rates and the regulatory process at rockymountainpower.net/rates.

Price information

Schedule 23/23A – General Service

Single or three phase service

Monthly Bill:

Customer Service Charge	
Secondary	\$13.72
Primary	\$41.16
Energy Rate	
May through October	7.6737 cents per kWh
November through April	6.6985 cents per kWh
Primary Voltage Discount	0.3706 cents per kWh
Minimum Bill	The Customer Service Charge
Seasonal Service Option (one year contract minimum):	
Net minimum seasonal payment	
Secondary	\$164.64
Primary	\$493.92
Plus appropriate Energy charges	

Schedule 6/6A – General Service – Large Power

Single or three phase service

Monthly Bill:

Customer Service Charge	
Secondary	\$30.97
Primary	\$92.91
Power Rate	
May through October	\$11.34 per kW
November through April	\$9.33 per kW
Energy Rate	3.1380 cents per kWh
Primary Voltage Discount	\$0.53 per kW of Power
Minimum Bill	The Customer Service Charge
Seasonal Service Option (one year contract minimum):	
Net minimum seasonal payment	
Secondary	\$371.75
Primary	\$1,115.25
Plus appropriate Power and Energy charges	

Schedule 10 – Irrigation and Soil Drainage Pumping Power Service

Single or three phase service to motors on pumps and machinery used for irrigation and soil drainage

Irrigation Season: June 1 to September 15

Schedule 10, continued

Monthly Bill, On-Season:

Customer Service Charge	
Small - 15 HP or less	\$11.74
Large - over 15 HP	\$34.14
Power Rate	\$4.55 per kW
Energy Rate	
First 25,000 kWh	7.1315 cents per kWh
Next 225,000 kWh	5.2750 cents per kWh
All Additional kWh	3.9095 cents per kWh
Minimum Bill	The Customer Service Charge

Monthly Bill, Post-Season:

Customer Service Charge	
	\$18.08
Energy Rate	6.0315 cents per kWh
Minimum Bill	The Customer Service Charge

Schedule 7/7A – Security Area Lighting

Initial Lumens	Watts	Rate Per Lamp
Mercury Vapor Lamps		
7,000	175	\$26.40
20,000	400	\$47.09
Sodium Vapor Lamps		
5,600	70	\$16.77 Lamp and Support Pole \$13.34 Lamp Only
9,500	100	\$19.20 Lamp and Support Pole \$15.77 Lamp Only
16,000	150	\$25.29 Lamp and Support Pole \$22.52 Lamp Only
27,500	250	\$36.37 Lamp and Support Pole \$32.94 Lamp Only
50,000	400	\$50.84 Lamp and Support Pole \$45.00 Lamp Only
Sodium Vapor Flood Lamps		
16,000	150	\$25.29 Lamp and Support Pole \$22.52 Lamp Only
27,500	250	\$36.37 Lamp and Support Pole \$32.94 Lamp Only
50,000	400	\$50.84 Lamp and Support Pole \$45.00 Lamp Only
Low Pressure Sodium Vapor Lamps (Energy Only)		
8,000	55	\$3.60 Per Lamp
13,500	90	\$5.32 Per Lamp
22,500	135	\$7.40 Per Lamp
33,000	180	\$9.01 Per Lamp

All customers are subject to additional charges/credits as set forth in Rocky Mountain Power's retail tariffs approved by the Idaho Public Utilities Commission including Adjustment Schedule 191.

Rates are in effect April 2009 and are subject to change by commission order.

These rate tables do not include specific pricing information for Schedules 9, 11, 12, 19, 24 or 35/35A since relatively few customers are billed this way. However, the schedules are available by calling toll free at 1-866-870-3419 or on our Web site at rockymountainpower.net/rates.

Explanation of terms:

Customer Service Charge: A fee charged that helps pay for the costs of providing service.

Kilowatt-hour (kWh): A measure of electrical energy equal to the amount of energy used by a 100-watt light bulb for ten hours or one 1,000 watt hair dryer for one hour.

Power (kW): The average kilowatts (kW) supplied during the 15-minute period of maximum use during the month as determined by a power meter.

Delivery Voltage: Secondary delivery voltage is service at less than 2,300 volts. Primary delivery voltage is service at 2,300 to less than 46,000 volts where customer provides and maintains all transformers and other necessary equipment. Transmission delivery voltage is service at 46,000 volts or greater through a single point of delivery.

Horsepower (HP): The total connected horsepower served through one service connection.

Attachment C

Attachment C

Rocky Mountain Power

Business Solutions: Present options
gives you an easy way to
manage your energy costs.

press 1 If you're not a customer, please call
1-800-432-6569 for more information.

press 2 For more information, please call
1-800-432-6569.

press 3 For more information, please call
1-800-432-6569.

press 4 For more information, please call
1-800-432-6569.

press 5 For more information, please call
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press 6 For more information, please call
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1-800-432-6569.

Lead the way with renewable energy

Our voluntary Blue Sky[®] renewable energy program gives you an easy way to reduce your energy costs to your business, the environment and the region.

For just a few dollars more on your monthly electric bill, you can:

- support renewable energy;
- encourage the development of renewable energy;
- meet your organization's environmental goals; and
- gain recognition for your efforts through your participation in our partner program and the Environmental Protection Agency's Green Power Partner program.

When you participate in Blue Sky, we purchase renewable energy credits on your behalf, which helps ensure that more electricity is generated from renewable resources in the region. Rocky Mountain Power does not profit from offering you this option.

Blue Sky purchases are in addition to our investments and plans to meet energy needs with cost-effective renewable energy. Working together, we can help bring even more renewable energy generation to the region.

For program details, a list of participating businesses and more information, visit www.rockymountainpower.com/blue-sky or call toll free at 1-800-746-3717.

We partner with business customers for better service

As part of our commitment to customer service, we want to clarify your role and ours in energy usage. The Idaho Public Service Commission governs relationships between utility consumers and companies. They set the rules for billing, complaints, service discontinuation and other matters. Rocky Mountain Power has prepared this summary of your rights and responsibilities when you apply for an account with, or as a current customer of, a utility company in Idaho.

Deposits:
If you are a current customer with a good payment record or a new customer who has good credit with your previous utility for the same type of service, you will not need to make a security deposit. If you don't meet these requirements, however, you may be asked to make a security deposit.

Small commercial customer - required deposits: will be no more than one-sixth of the estimated yearly billing at your service address, based on current rates. If you are a current customer, have paid all undeposited bills and have no more than one (1) late payment during the past 12 months, you may be eligible for a deposit waiver. If you are not a current customer, you may be required to pay the deposit in two installments if unable to pay in full.

Large commercial and industrial customers - required deposits: will be no more than one-third of the estimated yearly billing at your service address, based on current rates. If you are a current customer, you may be eligible for a deposit waiver. If you are not a current customer, you may be required to pay the deposit in two installments if unable to pay in full.

Prepayment customers - required advance bill payment: required advance payment of the full amount of the bill. If you are a prepayment customer, you will be required to pay the bill in full at the time of service.

Balance remains at the end of the season, it will be refunded.

Billing:
You will receive a bill for electric service each month, based on billing determinants, such as kilowatt hours registered on your electric meter during the billing period. Your bill will show the date on which your payment is due, the applicable rate schedule and the amount of the bill.

Disconnection notices:
Before we disconnect your service, in most instances, we will send you a written notice mailed at least 7 calendar days before the disconnection date. However, only a 24-hour notice will be given when you do not make a first payment according to your payment schedule, or when you have a payment check or make an electronic payment drawn on an account with insufficient funds.

If we do not shut off the service within 24 calendar days after the proposed date, you and remind you that your service can be disconnected after 24 hours.

Closing your account:
You need to let us know as soon as possible if you plan to move or close. If you do not let us know, we will bill you for the service. We can't close your account or process your closing bill until you let us know your move-out date.

Third party notices:
You may ask that another person receive your bill and notices.

Complaints and disputes

We will promptly investigate every complaint or dispute we receive, and we'll report to you on the results. If you are not satisfied with the results, please call 1-800-432-6569. Rocky Mountain Power's number is also printed on your bill.

If you're not satisfied with the assistance you received from the first person you talked to at Rocky Mountain Power, you have the right to request a supervisor. We'll give you the supervisor's name and how to reach him or her.

If you talk to the supervisor and still aren't satisfied, you can call in writing to the Public Utilities Commission, 1000 North Capitol Blvd., Boise, ID 83725-0099. The address is P.O. Box 63720, Boise, ID 83720-0074.

Rocky Mountain Power will not knowingly disconnect your service while you are lawfully pursuing a complaint with a supervisor or the commission.

Copies of these rules and Rocky Mountain Power's filed tariffs, including rate schedules and general rules and regulations, in their original writing, are available to you by request. Call 1-800-432-6569 for more information at www.rockymountainpower.com/regulations.

Mailing address:
Rocky Mountain Power
P.O. Box 1538
144 East Main Street, UT 84302-0338



We work for you

Rocky Mountain Power
Business Solutions team
is here to help you find your
business's best energy solution.
Call now.



Let's bring the power to you.

At Rocky Mountain Power,

we're committed

to providing you with more than just electricity. We offer a variety of programs and resources to help you save energy more efficiently and manage your bills. To learn more about what we're doing to help business customers succeed, visit rockymountainpower.net/business.

We're here when you need us



Our specially trained Business Solutions team is here to help - we have 17 specialists working for you. We'll be glad to assist you if you'd like to discuss your account, need help saving energy or other advice.

To meet our Business Solutions team, call toll free at 1-866-670-3419. Want to sign up for our quarterly newsletter or have a question? E-mail us at BusinessSolutions@rockymountainpower.net. We'll respond to your request within four business days. You can also find helpful information at rockymountainpower.net/business.

Choose a payment and billing option that fits your business

You can decide the most convenient way to receive and pay your bill. Here are a few options for you to consider:

Automatic monthly payment - Enroll in our automatic payment program, and you don't have to write a check or mail a payment - it's simply deducted from your bank account on the due date. Your payment is always on time, and you'll still receive a monthly bill in the mail to review.

Keeping customers informed - When you call in for Rocky Mountain Power, you'll learn the current electricity rates and appreciate when you can expect power to be restored. In most cases, you'll receive an accurate record card with confirming your power is back on. You can also request a cardlet from us.

Helping you do the bright thing

Save the environment, save money. Rocky Mountain Power offers a variety of programs and resources to help you save energy more efficiently and manage your bills. To learn more about what we're doing to help business customers succeed, visit rockymountainpower.net/business.



Rocky Mountain Power is proud to be a member of Alliant Energy. Alliant Energy is a leading provider of energy services in the United States. For more information, visit alliantenergy.com.

Our wattsmart programs and incentives help you manage costs

Our energy efficiency programs for Idaho businesses and industrial customers help you save on cooling, lighting and other equipment costs.

With our **Flashwave® Express** program, you receive pre-calculated cash incentives for lighting, HVAC and other equipment upgrades that increase your electric energy efficiency.

Our **Energy Flashwave®** program gives you cash incentives and energy engineering expertise to help you upgrade your commercial or industrial heating, cooling, refrigeration, compressed air, lighting, pumping or industrial process to the most energy-efficient system available. It's important to contact us before you begin your project.

Irrigation Energy Saver offers a variety of services, including new nozzles, gated and drain, cash incentives for pivot system equipment upgrades, on-site pump check and more.

These programs make the best use of the electrical system and keep costs down for everyone. Using energy wisely is also good for the environment. Visit rockymountainpower.net/wattsmart to learn more and inquire online. You can also call our energy services hotline toll free at 1-800-222-4315 or e-mail us at energy.expert@idcp.com.

Use our online tools to save energy. Our Business Solutions team provides energy audits and energy engineering services to help you identify energy-saving opportunities and reduce your energy costs. Visit rockymountainpower.net/business for more information.

Rocky Mountain Power recently helped lower your electric costs by \$1,200 in annual energy costs. Visit rockymountainpower.net/business for more information.

Attachment D

Attachment D

Consumer Information



We think our customers deserve excellent service. But what do we mean by that? Giving you clear, straightforward answers when you have questions, for one thing. This summary was written in cooperation with the Idaho Public Utilities Commission to give you answers to some common questions about bills, credit, deposits and other parts of your electric service. **If you'd like more information on any of the topics we cover here, please call Rocky Mountain Power toll free at 1-866-870-3419 or visit rockymountainpower.net/regulation.** *Si desea una copia en español de este resumen de los derechos y responsabilidades del consumidor, por favor llame al 1-888-225-2611. Su llamada será gratuita.*

Summary of Idaho utility consumer's rights and responsibilities

Rocky Mountain Power has prepared this summary of your rights and responsibilities when you apply for an account with, or are a current customer of a utility company in Idaho.

Customer responsibilities

- Use services safely and pay for them promptly.
- Contact Rocky Mountain Power when you have a problem with payment, service, safety, billing or customer service.
- Notify Rocky Mountain Power about billing or other errors.
- Contact Rocky Mountain Power when you anticipate a payment problem to try to set up a payment plan.
- Notify Rocky Mountain Power when you are moving to another location.
- Notify Rocky Mountain Power about stopping service in your name or about stopping service altogether.
- Allow safe, unobstructed access to your property for meter reading, tree pruning and other essential Rocky Mountain Power personnel and equipment.
- Provide notice to Rocky Mountain Power if you are making any significant change that may affect the electrical character of your load affecting you or others.

Deposits

If you are a current customer with a good payment record or a new customer who has good credit with your previous utility for the same type of service, you will not need to make a security deposit. If you don't meet these requirements, however, you may be asked to make a security deposit.

Small commercial customers – required deposits will be no more than one-sixth of the estimated yearly billing at your service address, based on current rates. If you are a current customer, have paid all undisputed bills and have no more than one (1) late payment during the past 12 consecutive months of service, your deposit will be returned with interest. If you are terminating your service, the deposit and accrued interest will be credited to your final bill.

Large commercial and industrial customers – required deposits will be an average two months of the peak bills in a one-year period. Customers are allowed to pay the deposit in two installments if unable to pay in full.

Irrigation customers – required advance will consist of advance payment of the full irrigation season's estimated billing. This advance will be applied to the account, and if a credit balance remains at the end of the season, it will be refunded.

Billing

You will receive a bill for electric service each month, based on billing determinants, such as kilowatt-hours registered on your electric meter during the billing period. Your bill will show the date on which your payment is due, the applicable rate schedule and the amount of the bill.

Disconnection notices

Before we disconnect your service, in most instances, we will send you a written notice mailed at least seven calendar days before the disconnection date. However, only a 24-hour notice

will be given when you do not make a first payment according to a payment arrangement, when you tender payment with a dishonored check or make an electronic payment drawn on an account with insufficient funds. If we do not shut off the service within 21 calendar days after the proposed date, we will make another attempt to contact you and remind you that your service can be disconnected after 24 hours.

Closing your account

You need to let us know as soon as possible if you plan to move or close your account. It's a good idea to do this yourself and not depend on someone else to do it for you. We can't close your account or process your closing bill until you let us know your move-out date.

Third party notices

You may ask that another person receive your bills and notices.

Complaints and disputes

We will promptly investigate every complaint or dispute we receive, and we'll report to you on the results. Contact us through our toll-free phone number at **1-866-870-3419**. Rocky Mountain Power's number is also printed on your bill.

If you're not satisfied with the assistance you received from the first person you talked to at Rocky Mountain Power, you have the right to request that your problem be handled by that person's supervisor, and we'll give you the supervisor's name and how he or she can be reached.

If you talk to the supervisor and still aren't satisfied, you can call or write the Idaho Public Utilities Commission. Their toll-free phone number is 1-800-432-0369. The address is P.O. Box 83720, Boise, ID 83720-0074.

Rocky Mountain Power will not knowingly disconnect your service while you are honestly pursuing a complaint with a supervisor or the commission.

Copies of these rules and Rocky Mountain Power's filed tariffs, including rate schedules and general rules and regulations, in their original wording, are available to you by calling toll free at **1-866-870-3419** or online at rockymountainpower.net/regulation.

Mailing address:

**Rocky Mountain Power
PO Box 25308
Salt Lake City, UT 84125**

Customer Service Guarantees

When we say we're going to give you a certain level of service, we mean it. And we're so serious about holding ourselves accountable, we've committed to seven Customer Service Guarantees that cover service issues that our customers have told us are most important – restoring and switching on power, keeping appointments, responding to billing inquiries, resolving meter problems and notifying of planned interruptions. If, for some reason, we can't live up to a commitment, we'll pay you. To find out more about our Customer Service Guarantees please call us toll free at **1-866-870-3419**, or visit rockymountainpower.net/guarantees.

Schedule 23/23A – General Service

Single- or three-phase service

Monthly bill:

Customer service charge: \$13.72, secondary
\$41.16, primary

Energy rate:

May–October 7.6737¢ per kwh
November–April 6.6985¢ per kwh

Energy cost adjustment:

0.100¢ per kwh, secondary
0.093¢ per kwh, primary

Primary voltage discount: 0.3706¢ per kwh

Minimum bill: Customer service charge

Seasonal service option: (one year contract minimum)

Net minimum seasonal \$164.64, secondary
payment \$493.92, primary
plus appropriate Energy charges

Schedule 6/6A – General Service – Large Power

Single- or three-phase service

Monthly bill:

Customer service charge: \$30.97, secondary
\$92.91, primary

Power rate:

May–October \$11.34 per kw
November–April \$9.33 per kw

Energy rate: 3.1380¢ per kwh

Energy cost adjustment:

0.100¢ per kwh, secondary
0.093¢ per kwh, primary

Primary voltage discount: \$0.53 per kw

Minimum bill: Customer service charge

Seasonal service option: (one year contract minimum)

Net minimum seasonal \$371.75, secondary
payment \$1,115.25, primary
plus appropriate Power and Energy charges

Explanation of terms:

Customer service charge: A fee charged that helps pay for the costs of providing service.

Kilowatt-hour (kwh): A measure of electrical energy equal to the amount of energy used by a 100-watt light bulb for ten hours or one 1,000-watt hair dryer for one hour.

Power (kw): The average kilowatts (kw) supplied during the 15-minute period of maximum use during the month as determined by a power meter.

Delivery voltage: Secondary delivery voltage is service at less than 2,300 volts. Primary delivery voltage is service at 2,300 to less than 46,000 volts where customer provides and maintains all transformers and other necessary equipment. Transmission delivery voltage is service at 46,000 volts or greater through a single point of delivery.

Horsepower (HP): The total connected horsepower served through one service connection.

Schedule 10 – Irrigation and Soil Drainage Pumping Power Service

Single- or three-phase service to motors on pumps and machinery used for irrigation and soil drainage.

Irrigation season: June 1 – September 15

Monthly bill, on-season:

Customer service charge:

Small – 15 HP or less \$11.74
Large – Over 15 HP \$34.14

Power rate: \$4.55 per kw

Energy rate:

First 25,000 kwh 7.1315¢ per kwh
Next 225,000 kwh 5.2750¢ per kwh
All additional kwh 3.9093¢ per kwh

Energy cost adjustment: 0.100¢ per kwh

Minimum bill: Customer service charge

Monthly bill, post-season:

Customer service charge: \$18.08

Energy rate: 6.0315¢ per kwh

Energy cost adjustment: 0.100¢ per kwh

Minimum bill: Customer service charge

Schedule 7/7A – Security Area Lighting

	Initial lumens	Watts	Rate per lamp
Mercury vapor lamps	7,000	175	\$26.47
	20,000	400	\$47.24
Sodium vapor lamps	5,600	70	\$16.80 w/support pole \$13.37 lamp only
	9,500	100	\$19.24 w/support pole \$15.81 lamp only
	16,000	150	\$25.35 w/support pole \$22.58 lamp only
	27,500	250	\$36.47 w/support pole \$33.04 lamp only
	50,000	400	\$50.99 w/support pole \$45.15 lamp only
Sodium vapor flood lamps	16,000	150	\$25.35 w/support pole \$22.58 lamp only
	27,500	250	\$36.47 w/support pole \$33.04 lamp only
	50,000	400	\$50.99 w/support pole \$45.15 lamp only
Low pressure sodium vapor lamps (energy only)	8,000	55	\$3.63 per lamp
	13,500	90	\$5.36 per lamp
	22,500	135	\$7.46 per lamp
	33,000	180	\$9.08 per lamp

Working to keep prices down: Delivering safe, reliable, low-cost power is a responsibility we take seriously. We continuously work to keep prices down by lowering our operating costs and improving how we do business. See how your rates compare at rockymountainpower.net/ratemap.

All customers are subject to additional charges/credits as set forth in Rocky Mountain Power's retail tariffs approved by the Idaho Public Utilities Commission including Adjustment Schedule 191. Energy Cost Adjustment rates shown are from Adjustment Schedule 94, Energy Cost Adjustment.

Rates are in effect December 2010 and are subject to change by commission order.

These rate tables do not include specific pricing information for Schedules 9, 11, 12, 17, 19, 24 or 35/35A since relatively few customers are billed this way. However, the schedules are available by calling toll free at 1-866-870-3419 or on our website at rockymountainpower.net/rates.