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Attorneys for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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|--|---|----------------------------|
| IN THE MATTER OF THE APPLICATION |) | |
| OF PACIFICORP DBA ROCKY MOUNTAIN |) | CASE NO. PAC-E-12-4 |
| POWER FOR AUTHORITY TO MODIFY |) | |
| ITS SCHEDULE NOS. 7, 7A, AND 11 AND |) | |
| ELECTRIC SERVICE REGULATION |) | COMMENTS OF THE |
| NO. 12. |) | COMMISSION STAFF |
| |) | |

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Kristine A. Sasser, Deputy Attorney General, submits the following comments in response to the Notice of Application and Notice of Modified Procedure issued on March 6, 2012, Order No. 32474.

BACKGROUND

On January 18, 2012, PacifiCorp dba Rocky Mountain Power (Company) filed Tariff Advice No. 12-01 proposing revisions to its Security Area Lighting (Schedule Nos. 7 and 7A) and Street Lighting (Schedule No. 11) tariffs and Line Extension Regulation (Regulation No. 12). Rocky Mountain Power requested that its proposed changes take effect on February 17, 2012.¹

¹ On February 16, 2012, Rocky Mountain Power notified the Commission by e-mail that it agreed to suspension of its proposed effective date.

After reviewing the filing, Staff recommended that the Commission suspend Rocky Mountain Power's proposed February 17 effective date and process the tariff advice through the use of Modified Procedure because of the numerous revisions across several rate schedules, including a proposed change to a regulation.

The Company proposes to remove low-pressure sodium vapor lamps from Schedule No. 7 and 7A.

The Company proposes to specify no new service for customer-owned/customer-maintained energy only service for Schedule No. 7.

The Company wishes to clarify obligations to repair inoperable lights and cost responsibility for premature replacement of operable lights for Schedule Nos. 7, 7A and 11.

The Company proposes to add language regarding temporary disconnect cost obligations, pole painting and light shielding for Schedule Nos. 7, 7A and 11.

The Company proposes to remove metal halide lamps from Schedule No. 11.

The Company wishes to clarify its extension allowance in Electric Service Regulation No. 12, which affects customers taking service under Schedule Nos. 11 and 12.

Rocky Mountain Power also proposes several general "housekeeping" type changes.

STAFF ANALYSIS

The Company seeks to discontinue offering service for low pressure sodium vapor (LPSV) lamps under Schedule Nos. 7 and 7A. LPSV lamps are used for security lighting, as are mercury vapor lamps and high pressure sodium vapor lamps. While generally considered quite efficient, LPSV lamps are not utilized as much as the other options, presumably due to poor color retention and a monochromatic orange-yellow light output.² Rocky Mountain Power has had no LPSV lamp customers in the past five years; therefore, Staff does not believe the Company's request would have a revenue shifting impact to other Schedule 7 customers.

Similarly, the Company has had no Schedule 11 customers with metal halide street lighting within the past five years. Rocky Mountain Power notes that federal legislation has made maintaining metal halide lamps more expensive and difficult. The 2007 Energy Independence and Security Act established higher efficiency standards for metal halide lamps, effectively preventing the sale of probe-start fixtures. High pressure sodium vapor lamps are the more common street

² LPSV lamps tend to wash out color, causing objects to appear as a yellowish black-and-white version of itself.

lighting option due to greater efficiency and longer fixture life. A comparison of lighting options for Schedule Nos. 7, 7A, and 11 are included as Attachment A. Given the lack of customer acceptance of LPSV lamps and metal halide street lights, Staff does not believe current or future customers are unduly harmed by not having these options available.

The Company also proposes to add provisions clarifying its obligations for repair, maintenance, pole repainting, and glare or vandalism shielding for Schedules 7, 7A, and 11. Most of the tariff language additions comport to the Company's current practices, with one exception. Rocky Mountain Power proposes that Schedule 11 customers who request removal of lights be responsible for any associated costs. Staff believes this is a reasonable modification, and is similar to the practices of Idaho Power and Avista Utilities. The Company has indicated to Staff that the requested revisions have been incorporated in corresponding rate schedules in Wyoming, and plans a similar filing in Utah.


Finally, Rocky Mountain Power proposes making customer advances toward non-residential street lighting extensions non-refundable (found in Electric Service Regulation No. 12 and applicable to Schedule Nos. 11 and 12). The Company calculates an extension allowance as five times the annual revenue from the lights to be added, and the customer advance would be applied toward costs that exceed this amount. Given the methodology used to calculate the allowance, Staff believes customer contributions would be minimal, if necessary at all. Staff also considers this an equitable alternative to having these costs recovered from other street lighting customers through base rates.

Staff considers the Company's proposed revisions reasonable and unlikely to materially affect current or future customers. There have been no public comments filed in opposition in this proceeding. Staff has not received any complaints, formal or informal, from customers under Schedule Nos. 7, 7A, or 11 in the last ten years. Since the majority of the amendments simply institutionalize current Company practice or remove unpopular lighting options, Staff does not believe the revisions are contentious by nature. Based on its findings, Staff recommends approving Rocky Mountain Power's proposed adjustments.

STAFF RECOMMENDATION

Staff recommends the Commission approve Rocky Mountain Power's proposed revisions to Schedule Nos. 7, 7A, 11 and Electric Service Regulation No. 12.

Respectfully submitted this 27TH day of March 2012.



Kristine A. Sasser
Deputy Attorney General

Technical Staff: Bryan Lanspery

i:umisc:comments/pace11.4ksbl comments

PacifiCorp Lighting Options for Schedule Nos. 7, 7A, and 11

| Lighting Option | Schedule | # Units, 2010 | Change in Units Since 2007 |
|-----------------|----------|---------------|-------------------------------|
| MV | 7 | 1948 | (277) |
| HPSV | 7 | 992 | (347) |
| HPS Flood | 7 | 557 | (6) |
| LPSV | 7 | 0 | 0 |
| MV | 7A | 1124 | (223) |
| HPSV | 7A | 951 | 206 |
| HPS Flood | 7A | 36 | (12) |
| LPSV | 7A | 0 | 0 |
| HPSV | 11 | 2057 | (203) |
| MH | 11 | 0 | 0 |

MV: Mercury Vapor

HPSV: High Pressure Sodium Vapor

HPS Flood: High Pressure Sodium Flood

LPSV: Low Pressure Sodium Vapor

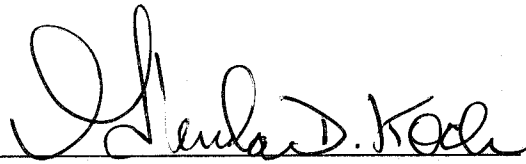
MH: Metal Halide

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 27TH DAY OF MARCH 2012, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. PAC-E-12-04, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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