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BEFORE  THE  IDAHO  PUBLIC  UTILITIES  COMMISSION

IN THE MATTER OF THE APPLICATION)

OF PACIFICORP DBA UTAH POWER &)CASE  NO.  UPL-E-95-1

LIGHT COMPANY FOR AUTHORITY TO)

AMEND ITS IDAHO TARIFF LANGUAGE)

REGARDING CONNECT AND DISCON-)

NECT SERVICE TO IRRIGATION)

PUMPS.)COMMENTS OF

 )THE COMMISSION

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COMES  NOW  the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Scott Woodbury, Deputy Attorney General, and submits the following  comments for the Commission’s consideration in Case No. UPL-E-95-1.

Utah Power has requested to keep irrigation customers connected year round unless the customer requests disconnection in writing.  Staff acknowledges the benefits to the Company of this proposed change and does not dispute them.  However, Staff does have some concerns related to customer safety.  These concerns are outlined below and support Staff's recommendations which follow.

Electrical service for nearly all irrigation pumping service differs from residential, commercial and most industrial service in that the electric panels are located remote from buildings or other structures.  The panels are typically free-standing and the electric meter is usually mounted on a pole several feet away.

In the typical installation, the meter, panel, and the pump motor are completely exposed to the weather.  This can include sunlight, rain, snow, wind, blowing dust, and lightning.  Although the equipment is made to withstand these conditions, periodic maintenance is still highly recommended.  Owners should check for cracked water seals, loose connections, dirty or loose contacts, blown fuses and lightning arresters, loose conduit and other problems.  Although these inspections can be made anytime, they are especially recommended before the start of each irrigation season.  The advantage to a pre-season inspection is that cleaning, repair and checking for loose connections is easier and much safer when the panel and equipment is not energized.  Inspection and repair can be done with the panel energized and the main breaker turned off, but portions of the panel are still "hot."     A similar analogy would be repair of a home appliance.  The appliance may be able to be repaired while still plugged in, but it is much safer to repair it when it is unplugged.  By leaving irrigation service connected year round, the opportunity to inspect and repair it while things are still "unplugged" is lost.

Pump panels typically contain small strip "heaters" which are intended to keep contacts warm and operable in cold weather.  A warm, dry electric panel, while desirable from an operational standpoint, also creates an ideal environment for rodents, bugs and insects.  Cold winter weather forces these animals to seek more hospitable conditions like those found in energized pump panels.  If panels, conduits and other openings are not completely sealed, these animals can build nests and create dangerous conditions for short circuiting once the pumps are turned on.  The problem may still exist even in non-energized panels, but the chances are less in non-energized panels where no heaters are present to attract rodents.

During the non-irrigation season it is sometimes common for farmers to turn stock loose in fields to graze on stubble left in the field.  Stock tend to seek scratching posts, and pump panels make good ones.  Grazing animals can loosen connections and conduits, creating unsafe conditions and increasing the importance of pre-season inspections and repair.

 Since irrigation service has previously been disconnected in the winter, there will be a period of at least one season, and more likely several, in which safety will be a greater concern.  Owners and hired help, many of whom do not speak English, will need to be informed about the change and educated about the dangers.  It will likely take some time before owners, hired help, and even electricians are completely aware that pump panels are energized year round.

Recommendations:

1.UP&L should implement a campaign to educate irrigation customers about the change.  This could include bill inserts, letters and media advertising.

2.Stickers should be attached to the front of pump panels (and also inside if possible) with a message stating that the panel is always energized.  The message should appear in both English and Spanish.

3.UP&L should periodically visually inspect irrigation services.  The inspection should include equipment between the Company's meter and the customer's pump, as well as equipment on the Company's side of the meter.  While the customer is ultimately responsible for the safety of their own equipment, it would be irresponsible for the Company to re-energize equipment with obvious safety problems.

4.UP&L should record and report any electrical accidents that occur during the non-irrigation season.  This would alert the Company if safety is actually a problem.

5.Customers should be able to request disconnection  for the entire non-irrigation season or for any part of it for purposes of making inspections or repairs.  There should be no charge for one disconnection and reconnection, and customers should be able to request disconnection either orally or in writing.

DATED  at Boise, Idaho, this            day of January 1995.

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Scott Woodbury

Deputy Attorney General

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Rick Sterling

Staff Engineer

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