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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE JOINT)
PETITION OF AVISTA CORPORATION,)
IDAHO POWER COMPANY, AND ROCKY) CASE NO. GNR-U-14-01
MOUNTAIN POWER COMPANY FOR AN)
EXEMPTION FROM UTILITY CUSTOMER)
RELATIONS RULE 311(4) AND (5).)
_____)

IDAHO POWER COMPANY

DIRECT TESTIMONY OF TAMI WHITE

IN SUPPORT OF JOINT PETITION

1 Q. Please state your name and business address.

2 A. My name is Tami White and my business address
3 is 1221 West Idaho Street, Boise, Idaho 83702.

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

5 A. I am employed by Idaho Power Company ("Idaho
6 Power" or "Company") as the Senior Manager of Rate Design
7 in the Regulatory Affairs department.

8 Q. Please describe your educational background.

9 A. I earned a Bachelor of Business Administration
10 degree in Accounting from California State University,
11 Stanislaus. I have attended various electric utility
12 courses, including "Electric Utility System Operation," a
13 course offered through Professional Training Systems, Inc.,
14 and "Overview of System Operations" presented by the
15 Western Electricity Coordinating Council. In 2014, I
16 attended the Utility Executive Course at the University of
17 Idaho.

18 Q. Please describe your work experience with
19 Idaho Power.

20 A. I began my employment with Idaho Power in 1999
21 as a Financial Analyst in the Company's Delivery Finance
22 Support area where I provided accounting and financial
23 support services to the Delivery Business Unit. In 2005, I
24 was promoted to Finance Team Leader where I was responsible
25 for leading a group of Financial Analysts, Accountants, and

1 Accounting Specialists in providing accounting and
2 financial support services to the Operations Business Unit.
3 I was responsible for all aspects of the monthly accounting
4 closing process for the Operations Business Unit and for
5 the monthly billing and settlements processes for
6 transmission sales and purchases, wholesale energy
7 transactions, Public Utility Regulatory Policies Act of
8 1978 (PURPA) transactions, large special contracts, and
9 joint use transactions. While working in Operations
10 Finance Support, I participated in the development of the
11 Company's Federal Energy Regulatory Commission ("FERC")
12 Open Access Transmission Tariff ("OATT") formula rate for
13 transmission services.

14 In October of 2010, after 11 years in finance, I
15 accepted a position as Manager of FERC and Regional Affairs
16 in the Regulatory Affairs department. In this position I
17 was responsible for managing regulatory activities such as
18 the preparation and filing of Idaho Power's OATT rates for
19 transmission service, supervising participation and
20 settlement negotiations of Bonneville Power Administration
21 rate cases, and creating analyses that form the basis for
22 Idaho Power's FERC regulatory strategy.

23 In January of 2012, I was promoted to Senior Manager
24 of Rate Design. As Senior Manager of Rate Design, I
25 oversee the Company's rate design activities such as

1 regulatory ratemaking and compliance filings, tariff
2 administration, and the development of various pricing
3 strategies and policies.

4 Q. What is the purpose of your testimony in this
5 proceeding?

6 A. The purpose of my testimony is to describe
7 Idaho Power's request for an exemption from the provisions
8 of Utility Customer Relations Rules ("UCRR") 311(4) and (5)
9 and the Company's planned efforts to inform its customers
10 regarding the anticipated changes if the request is
11 approved.

12 **I. REQUEST FOR EXEMPTION**

13 Q. Please describe Idaho Power's proposal.

14 A. Idaho Power is requesting an exemption from
15 the requirement to have its personnel knock at the door
16 during a disconnection for non-payment transaction when
17 that location has a meter with remote connect/disconnect
18 capability. This change will allow Idaho Power to more
19 fully utilize its metering capabilities and reduce
20 operating and maintenance ("O&M") costs. Idaho Power is
21 requesting an exemption from the provisions of UCRR 311(4)
22 and (5) only for locations where remote connect/disconnect
23 capable meters have been installed. UCRR 311(4) requires
24 that immediately preceding termination of service, utility
25 personnel must attempt to make face-to-face contact with

1 the customer or other responsible adult on the premises to
2 accept payment on an outstanding bill. UCRR 311(5)
3 requires the utility employee designated to terminate
4 service to notify the customer in person or with a
5 conspicuously placed notice of the procedure to reconnect
6 service. Idaho Power is requesting an order by December
7 31, 2014, with an effective date of March 1, 2015.

8 Q. Why is Idaho Power requesting this exemption?

9 A. Due to advancements in meter technology, it is
10 now possible to acquire meters with remote
11 connect/disconnect capability eliminating the need to send
12 a Company representative to a customer's location to
13 connect or disconnect service. Idaho Power identified
14 14,500 locations where it made sense, from a cost/benefit
15 perspective, to install these meters. Idaho Power began
16 installing these meters in April of 2014.

17 Q. What criterion did Idaho Power use to
18 determine where remote connect/disconnect meters should be
19 installed?

20 A. The criterion Idaho Power used to determine
21 which locations should have remote connect/disconnect
22 metering capability was any location that was field visited
23 two or more times during an approximately 18-month period
24 ending August 2013.

25

1 The reasons for the field visits were primarily due
2 to collection activity, payments collected at the door, and
3 disconnections for non-payment. These visits also included
4 customer requested connections and disconnections. After
5 these 14,500 meters are installed, Idaho Power will have
6 the capability to remotely connect/disconnect service at
7 these locations and avoid the cost of sending an employee
8 to the location.

9 Q. Does Idaho Power plan to install remote
10 connect/disconnect capable meters at more locations in the
11 future?

12 A. Idaho Power will continue to look for
13 locations where this remote connect/disconnect metering
14 technology provides cost reductions. This could include
15 remote locations, locations that are difficult to access,
16 or where safety is a concern. These meters are being
17 installed at residential or small commercial customer sites
18 of 240 volt, single phase services that are 200 amps or
19 less.

20 Q. Is Idaho Power seeking an exemption from
21 UCRR(4) and (5) for these locations?

22 A. Yes.

23 Q. If Idaho Power's request for an exemption is
24 approved, when will it start using the remote capability of
25 these meters?

1 A. Although Idaho Power began installing remote
2 connect/disconnect capable meters at select locations in
3 April 2014, the Company will continue to adhere to the
4 applicable UCRRs until such time that its request for an
5 exemption from the rules is granted by the Idaho Public
6 Utilities Commission ("Commission").

7 As required by UCRR 306(1), Idaho Power will not
8 terminate service or threaten to terminate service during
9 the months of December through February to any residential
10 customer who declares that he or she is unable to pay in
11 full for utility service and whose household includes
12 children, elderly, or infirm persons, whether they have a
13 remote connect/disconnect capable meter or not. Idaho
14 Power refers to this December through February time period
15 as "winter moratorium." During winter moratorium, Idaho
16 Power plans to continue to knock on the door of all
17 customers (including customers with remote
18 connect/disconnect meters) before a disconnection for non-
19 payment.

20 Idaho Power will continue to follow all other rules
21 for health and safety exceptions and all rules regarding
22 day and time restrictions on disconnections.

23 **II. CUSTOMER IMPACT AND OUTREACH**

24 Q. If Idaho Power's request for exemption is
25 granted, how will customers be impacted?

| | 2010 | | 2011 | | 2012 | | 2013 | |
|------------------------------|------------------|---------------|------------------|---------------|------------------|---------------|------------------|---------------|
| Drop Box | 132,307 | 2.7% | 127,010 | 2.6% | 118,048 | 2.4% | 136,287 | 2.7% |
| Postal Service (mail) | 2,511,676 | 50.7% | 2,378,874 | 48.2% | 2,232,588 | 44.7% | 2,101,991 | 41.4% |
| Paystations | 386,915 | 7.8% | 364,230 | 7.4% | 341,678 | 6.8% | 332,525 | 6.5% |
| Preferred Pay (1) | 458,987 | 9.3% | 475,396 | 9.6% | 481,999 | 9.6% | 497,621 | 9.8% |
| Paperless bank debiting (2) | 1,111,358 | 22.4% | 1,206,593 | 24.4% | 1,243,656 | 24.9% | 1,309,184 | 25.8% |
| myAccount Bill Pay (3) | | | 24,248 | 0.5% | 292,528 | 5.9% | 444,808 | 8.8% |
| On-line or phone payment (4) | 331,209 | 6.7% | 340,727 | 6.9% | 270,000 | 5.4% | 248,169 | 4.9% |
| Pay at Door (5) | 18,170 | 0.4% | 19,255 | 0.4% | 17,691 | 0.4% | 11,487 | 0.2% |
| | 4,950,622 | 100.0% | 4,936,333 | 100.0% | 4,998,189 | 100.0% | 5,082,072 | 100.0% |

- (1) Auto bank debiting
(2) Paperless bank debiting through CheckFree or other banks or credit unions, or through vendor electronic data interchange.
(3) Electronic bank payment through myAccount at idahopower.com.
(4) On-line or phone payment with check, debit or credit card, \$2.85 fee applies to transaction.
(5) 2013 payments collected at the door reflect data through August of 2013.

1 Currently, Idaho Power receives approximately 40
2 percent of payments via the postal service, while the
3 remaining 60 percent of payments are received through other
4 means. During 2012, there were 341,678 payments processed
5 by the Company's pay station network. This compares to
6 17,691 payments collected in the field during a disconnect
7 visit. The 17,691 payments taken during a disconnect visit
8 represent 13,094 customers. This means that 4,597 payments
9 (26 percent) were repeat customers using the field
10 collector as a payment method.

11 Q. How will customers that have remote
12 connect/disconnect capable meters be informed of the change

1 in the service disconnection process if Idaho Power's
2 request for exemption is granted?

3 A. Idaho Power will inform the customer via an
4 insert included in the initial disconnect notice and again
5 in the final disconnect notice. This insert will inform
6 the customer that Idaho Power will not be visiting their
7 location to accept payment at the door or to disconnect
8 service and will also include information about how the
9 customer can make payments, how they can avoid service
10 disconnections, and where they may apply for energy
11 assistance. The insert will also provide information on
12 the steps the customer can take to have service reconnected
13 should service be disconnected.

14 Q. Does Idaho Power believe an insert in the
15 disconnection notice is adequate communication to customers
16 with remote connect/disconnect meters?

17 A. Yes. Providing detailed information at the
18 time the customer is facing a potential service
19 disconnection makes the information timely and pertinent.
20 In addition, providing the detailed information to only
21 those customers whose behavior triggers a service
22 termination event avoids confusion or possible upset for
23 those customers who have the remote connect/disconnect
24 meters but for whom the technology will not be used for
25 involuntary service disconnections. Because Idaho Power is

1 installing remote connect/disconnect meters in only a small
2 portion of its customer locations, a broader educational
3 campaign does not seem appropriate.

4 Q. Is Idaho Power proposing to change its current
5 service disconnection practices for customers that do not
6 have remote connect/disconnect capable meters?

7 A. No. Idaho Power proposes to continue knocking
8 and offering to take payment before disconnection for all
9 service points that do not have remote connect/disconnect
10 capable meters.

11 Q. Why is Idaho Power proposing to continue
12 knocking on the door for these customers?

13 A. Locations without remote connect/disconnect
14 meters will still need to be visited by an Idaho Power
15 representative to connect or disconnect service. Because
16 customers that do not have remote connect/disconnect
17 capable meters have less on-site collection activity and
18 are less likely to expect field personnel on their
19 property, Idaho Power plans to continue knocking on the
20 doors of these customers so as to avoid startling occupants
21 while crossing the property to the meter.

22 **III. STAKEHOLDER OUTREACH**

23 Q. Has Idaho Power consulted with any of its
24 stakeholders regarding this proposal?

25

1 A. Yes. On Wednesday, April 23, 2014 and again
2 on Tuesday, August 29, 2014 representatives from Idaho
3 Power's Regulatory Affairs department met with Commission
4 staff to discuss its proposal.

5 On Monday, September 22, 2014 representatives from
6 Idaho Power's Regulatory Affairs department and Customer
7 Relations department visited with the executive director of
8 the Community Action Partnership of Idaho ("CAPAI") to
9 discuss its proposal. Additionally, on Tuesday, September
10 30, 2014 representatives from Idaho Power's Regulatory
11 Affairs department and Customer Relations department
12 visited with the executive council volunteer and the
13 director of advocacy of AARP, Idaho to discuss its
14 proposal.

15 **IV. BENEFITS AND REDUCED CHARGES**

16 Q. What benefits will be derived if Idaho Power's
17 request for exemption is granted?

18 A. There are many benefits of the remote
19 connect/disconnect meter technology, both for customers who
20 have these meters and those who do not. The primary
21 benefit for both the Company and its customers of
22 implementing this remote connect/disconnect meter
23 technology is estimated reduced O&M costs of approximately
24 \$700,000 per year. This reduction comes from the
25 elimination, through attrition, of seven meter specialist

1 positions - which is 24 percent of the total number of
2 meter specialist positions. This savings includes labor,
3 overtime, and benefits costs. It is expected that 36
4 percent of total on-site collection and
5 connection/disconnection activity will be eliminated by
6 this proposal.

7 Q. What costs will be incurred if Idaho Power's
8 request for exemption is granted?

9 A. In order to install the 14,500 remote
10 connect/disconnect capable meters, Idaho Power will incur a
11 one-time capital expense of \$2.1 million and will return to
12 inventory and re-use meters valued at \$855,500.

13 Idaho Power purchased the remote connect/disconnect
14 capable meters in late 2013 to take advantage of a discount
15 price offer. Idaho Power will use the meters that are
16 removed in this process for new customer installations or
17 for maintenance replacement meters.

18 Q. Are there other benefits to customers
19 generally?

20 A. Yes. Because there will be fewer meter
21 specialists needed in the field, there will be fewer
22 vehicles required and fewer miles driven. In addition to
23 the O&M savings identified above, implementing Idaho
24 Power's proposal will result in fewer vehicles on the road,
25 thus reducing vehicle expenses and emissions.

1 Q. How do customers who have remote
2 connect/disconnect capable meters benefit?

3 A. For those customers who are facing a
4 disconnection for non-payment, the new process will be more
5 predictable and timely because the customer will know
6 precisely what day their service is subject to
7 disconnection and will not have to guess when the Idaho
8 Power field personnel will arrive. Unlike on-site manual
9 service disconnections, service disconnection at locations
10 where the meter has remote connect/disconnect capability
11 will be on a specific schedule. Idaho Power plans to
12 schedule remote disconnections for non-payment early in the
13 day so that customers will have time to make payment
14 arrangements in order to have their power turned back on in
15 the same day in most cases. Predictability of disconnects
16 and reconnects will result in a more consistent process
17 that can help customers more easily manage these
18 situations.

19 Additionally, the remote connect/disconnect meter
20 has the ability to reconnect service much quicker once
21 payment is received. Idaho Power anticipates that
22 customers with remote reconnect technology will experience
23 reconnection within minutes rather than the hour(s)
24 sometimes required for a crew to travel to customers'
25 premises and manually reconnect them.

1 Because Idaho Power personnel will no longer be
2 required to visit the premises to connect or disconnect
3 service, customers are afforded more privacy in their homes
4 and back yards where the meters are typically located.

5 Residential and Small General Service customers who
6 in the past have paid at the door have been subject to a
7 \$20 Field Visit Charge which is incurred when Idaho Power
8 travels to the customer premises to collect payment or to
9 disconnect service. Because this option will no longer be
10 available, customers will not incur this fee. This Field
11 Visit Charge is reflected on Idaho Power's Schedule 66.

12 Q. What are the current Service Connection
13 Charges a Residential or Small General Service customer
14 pays when Idaho Power travels to the customer premises to
15 reconnect the service?

16 A. When Idaho Power sends personnel to reconnect
17 service at the customer's location, the customer is subject
18 to a Service Connection Charge that varies by the time of
19 day and day of week the reconnection is made. These
20 charges are reflected on Idaho Power's Schedule 66 and are
21 shown below:

22 Service Connection Charge for Schedules 1, 3, 4, 5, 7, 9

| | | |
|----|----------------------------------|------|
| 23 | Monday-Friday 7:30 am to 6:00 pm | \$20 |
| 24 | 6:01 pm to 9:00 pm | \$45 |
| 25 | 9:01 pm to 7:29 am | \$80 |
| 26 | Company Holidays and Weekends | |
| 27 | 7:30 am to 9:00 pm | \$45 |
| 28 | 9:01 pm to 7:29 am | \$80 |

1 Q. What is Idaho Power's proposal concerning
2 these fees?

3 A. For Residential and Small General Service
4 customers with remote connect/disconnect capable meters,
5 Idaho Power proposes to reduce the Service Connection
6 charge to \$13 for all hours of the day and all days of the
7 week because Idaho Power will not incur additional costs to
8 reconnect customers during non-business hours. The reduced
9 Service Connection charge for customers with remote
10 connect/disconnect capable meters represents the costs of
11 back office operations necessary to reconnect and re-
12 establish service, but does not include any field visit
13 costs.

14 **V. CONCLUSION**

15 Q. By what date does Idaho Power request an
16 order?

17 A. Idaho Power is requesting an order by December
18 31, 2014, for the exemption to become effective March 1,
19 2015. The December 31st date will give the Company time to
20 prepare and implement the communication plan and to make
21 any modifications in technology systems needed for
22 implementation.

23 Q. Does this conclude your testimony?

24 A. Yes it does.

25

