

KARL T. KLEIN
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0320
IDAHO BAR NO. 5156

RECEIVED
2014 DEC 10 PM 2:15
IDAHO PUBLIC
UTILITIES COMMISSION

Street Address for Express Mail:
472 W. WASHINGTON
BOISE, IDAHO 83702-5918

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF AVISTA CORPORATION,)
IDAHO POWER COMPANY, AND) CASE NO. GNR-U-14-01
PACIFICORP DBA ROCKY MOUNTAIN)
POWER'S PETITION FOR AN EXEMPTION TO) COMMENTS OF THE
UTILITY CUSTOMER RELATIONS RULES) COMMISSION STAFF
311(4) AND (5).)**

The Staff of the Idaho Public Utilities Commission comments as follows on Avista Corporation, Idaho Power Company, and PacifiCorp dba Rocky Mountain Power's Petition for an exemption to Utility Customer Relation Rules 311(4) and (5).

BACKGROUND

On September 30, 2014, Avista Corporation, Idaho Power Company, and PacifiCorp dba Rocky Mountain Power (the "Petitioners") petitioned the Idaho Public Utilities Commission for an Order exempting them from Utility Customer Relations Rule ("UCRR") 311.04 and .05, IDAPA 31.21.01.311.04 and .05. The Rule states:

311. TIMES WHEN SERVICE MAY BE TERMINATED – OPPORTUNITY TO AVOID TERMINATION OF SERVICE (Rule 311).

04. Opportunity to Prevent Termination of Service. Immediately preceding termination of service, the employee designated to terminate service shall identify himself or herself to the customer or other responsible adult upon the premises and shall announce the purpose of the employee's presence. This employee shall have in his or her possession the past due account record

of the customer and shall request any available verification that the outstanding bills are satisfied or currently in dispute before this Commission. Upon presentation of evidence that outstanding bills are satisfied or currently in dispute before this Commission, service shall not be terminated. The employee shall be authorized to accept full payment, or, at the discretion of the utility, partial payment, and in such case shall not terminate service. Nothing in this rule prevents a utility from proceeding with termination of service if the customer or other responsible adult is not on the premises.

05. Notice of Procedure for Reconnecting Service. The utility employee designated to terminate service shall give to the customer or leave in a conspicuous location at the affected service address, a notice showing the time of and grounds for termination, steps to be taken to secure reconnection, and the telephone numbers of utility personnel or other authorized representatives who are available to authorize reconnection.

The Petitioners explain that they seek the exemption so they can opt to stop accepting payment at the door and providing customers with on-site personal or paper notice. The Petitioners note that they may petition the Commission for an exemption if “unusual or unreasonable hardships result from the application of any of these rules.” *See* Petition at 5, quoting UCRR 003 and 009. They argue that “good cause exists to grant” the requested exemption because it would enable them to use advances in metering, communication, and electronic payment technologies to potentially reduce operating costs and increase the safety of utility employees without sacrificing customer service. *Id.*

The Petitioners maintain that customers will not be harmed if the exemption is granted because customers will still receive multiple notices before disconnection. The differences between the Petitioners’ current notification practices and their proposed notification practices under the exemption are summarized in Attachment 1. The Petitioners request that the proposed exemption from UCRR 311.04 and .05 take effect at the end of the winter disconnection moratorium on March 1, 2015.¹

The Commission’s Staff held a public informational workshop in this matter on November 21, 2014. Representatives of the Commission Staff, Avista, Idaho Power, Rocky Mountain Power, Community Action Partnership Association of Idaho, Snake River Alliance,

¹ The “winter disconnection moratorium” is specified in UCRR 306, IDAPA 31.21.01.306. That rule generally precludes utilities from terminating service in December through February for residential customers who declare that they cannot fully pay for utility service and whose household includes children, elderly, or infirm persons.

United Water Idaho, and Intermountain Gas attended the workshop either in person or telephonically.

STAFF REVIEW

Although the Petitioners central question to the Commission is whether to grant a rule exemption, the implications of this case are much broader. Granting a rule exemption to Idaho's three major electric utilities will signal a fundamental shift in Commission policy with respect to utilities' customer relations.² Technological changes now enable utilities and customers to interact without face-to-face contact. Consumer expectations also have changed, with increasing demand for 24/7 availability of information and services. At the same time, opportunities for face-to-face communication have changed as local utility offices have closed to the public and new communication and payment options have become available. Concerns have been expressed regarding utility employee safety and customer privacy. The Petition provides the Commission with a timely opportunity to explore ways to adapt to all of these changes.

Deployment of Remote Metering Technology

Idaho Power has and Avista plans to have Advanced Metering Infrastructure (AMI) that would let them remotely disconnect and reconnect customers if the exemption is granted. Remote connect/disconnect meters have been installed at the premises of residential and non-residential (primarily small business) customers. Rocky Mountain Power, on the other hand, has no Idaho meters with remote disconnection and connection capability. Idaho Power's and Avista's meters are discussed below.

In 2008, the Commission authorized Avista to implement a remote disconnect/reconnect pilot program for 600 customers and Avista currently has 479 meters with remote connect/disconnect capability in place.³ In Idaho, Avista uses two types of devices. One device uses power line carrier and the other devices uses radio frequency paging to activate the switch that connects and disconnects service. Avista is evaluating the installation of AMI in its Washington service territory beginning in 2016, with further deployment in Idaho thereafter.

² Avista also provides gas service in Idaho. Only electric meters have remote connect/reconnect capability.

³ See Case No. AVU-E-07-09, Order No. 30603. Avista was authorized to continue the pilot program for an indefinite time period by Order No. 31009.

Avista's new AMI meters will have built-in remote connect/disconnect capability. If the rule exemption is granted, Staff assumes Avista will want to use this capability throughout its Idaho service territory.

By the end of 2014, Idaho Power will have replaced 14,500 AMI meters with new meters that have remote connect/disconnect capability.⁴ Idaho Power has not said whether it plans to install more remote connect/disconnect meters after 2014.

Avista and Idaho Power have certain criteria that they use to decide which customers should receive remote connect/disconnect meters. Avista decides where to place these meters based on: a history of multiple disconnect visits or disconnection, employee safety (e.g., threats posed by customers or animals), and lack of meter access. Idaho Power selects sites based on a history of multiple disconnect visits or disconnection for non-payment. Both companies have identified other possible uses for meter placement, such as remote or difficult-to-access service locations.

Meters with remote connect/disconnect capability cost much more than meters without that capability, and widespread deployment represents a large capital expenditure.⁵ However, the resulting reduction in labor and transportation costs associated with utility employees making field visits to disconnect service, leave notices, and collect payment will produce on-going savings in operating costs⁶ that ultimately will reduce the upward pressure on rates for all customers.

Given the higher cost of remote connect/disconnect meters at the present time, Staff believes it is reasonable for Avista and Idaho Power to strategically place meters at locations that meet the screening criteria described above. Most customers selected thus far for meter placement have a history of non-payment, requiring multiple premise visits and disconnection.

⁴ Staff notes that Idaho Power has not sought authorization to install meters with remote connect/disconnect capability. However, this capability was considered as a potential benefit when the Commission approved installation of Idaho Power's AMI infrastructure.

⁵ Idaho Power's net investment in its newly-installed remote connect/disconnect meters is \$1,244,500. See Testimony of Company witness Tami White, p. 12, lines 9-12.

⁶ Idaho Power estimates annual cost savings of approximately \$700,000. See Joint Petition for Exemption, p. 4.

Customer Impact

UCRRs 311.04 and 05 require utilities to knock on customers' doors before disconnecting service, and to accept payment at the door. Under the rules, if someone is at the premises, the utilities advise that person that disconnection is imminent and that they may avoid disconnection by paying at the door or requesting a disconnection delay. The utilities also tell the person how to restore service if it is disconnected. If no one is home, a written notice with this information is left on site.

If the Commission grants the Petitioners requested exemption, then the Petitioners will have the discretion to take or not take the actions required under Rule 311. Both Avista and Idaho Power say they will continue to follow the rule for customers with manual disconnect meters. However, they would cease the knock-and-accept-payment practices for customers with meters having remote connect/disconnect capability. On the other hand, although Rocky Mountain Power only has manual-disconnect meters, it intends to stop knocking and accepting on-site payment. Rather, if the exemption is granted, Rocky Mountain will leave an informational door hanger when manual disconnection occurs.

Establishing Different Practices for Customers with Remote Connect/Disconnect Meters

Avista and Idaho Power will knock and accept payment from customers with "regular" meters but not from customers with remote connect/disconnect meters. This disparity may result in some customer confusion, but is an unavoidable consequence of having meters with differing capabilities.

Staff finds it somewhat contradictory that the employee safety concerns expressed in the Petition do not apply to customers regardless of meter type. Staff assumes that both Avista and Idaho Power are confident that they will be able to identify customers that pose a safety risk and install a remote connect/disconnect meter at those locations. Staff recognizes that this is a time of transition, and is willing to accept Avista and Idaho Power's decision to only change its practices with respect to customers who have remote connect/disconnect meters. Staff notes, however, that in the future, both companies may want to consider adopting uniform procedures.

Customer and Company Benefits From Exemption

For Avista and Idaho Power, remote connection and disconnection provides several benefits:

- Decreases opportunity for on site conflicts between customers and utility;
- Increases field-employee safety by reducing the risk of physical harm or robbery;
- Increases certainty on when disconnection and reconnection will occur;
- Encourages customer's to communicate with the utility call center to make payment arrangements, make the utility aware of a medical emergency, etc.;
- Reduces utilities' operating costs associated with field disconnection visits; and
- Allows for quicker reconnection of service after the customer pays or makes payment arrangements.⁷

Rocky Mountain Power, which does not have remote connect/disconnect meters, says not being required to knock provides several benefits during a manual disconnection visit:

- Decreases opportunity for on site conflicts between customers and utility;
- Increases field-employee safety; and
- Encourages customer's to communicate with the utility call center to make payment arrangements, make the utility aware of a medical emergency, etc.

On the other hand, if someone is at the premises when the field disconnection visit occurs, there are benefits to knocking on the door and/or accepting payment:

- Customer avoids disconnection of service;
- Customer is made aware of imminent disconnect; and
- Customer has the opportunity to delay disconnect.

Customers of Avista and Idaho Power who do not have a remote connect/disconnect meter will continue to have these options.

⁷ Avista reports that service typically was restored in less than 15 minutes.

Payment at the Door and Other Payment Options

A relatively small percentage of customers respond to a knock on the door by paying to prevent disconnection. Of the total field disconnect visits made by Avista, Idaho Power and Rocky Mountain Power in CY 2013, the percentage of customers who paid at the door ranged from 20% (Avista and Idaho Power) to 14% (Rocky Mountain Power). Although payment at the door allows customers to pay at the last possible minute, the customer risks disconnection if he or she is not on the premises at the right time or is unable to answer the knock at the door when it comes. Staff agrees with the Petitioners that there are many other payment options available to customers, each of which provides better assurance that service will not be disconnected. *See* Attachment 2 for a list of payment options with associated costs. In addition, a field-visit charge⁸ is assessed when a customer pays at the door, making it the most expensive payment option currently available to customers.

Staff believes that if an exemption is granted, the utilities should undertake an effective customer-communication campaign, including informing customers about available payment options, to notify customers in advance that the utilities will no longer accept payment at the door and allow customers to consider which payment option best fits their needs.

Customer Notification

UCRR 304 requires utilities to notify customers of a pending disconnection for non-payment. The content of the notice is prescribed by Rule 305. *See* Attachment 3 for the complete text of these two rules.

If the Commission grants the utilities an exemption from UCRR Rules 311.04 and .05, the utilities would continue to provide written and oral (phone) notices to all customers. However, Avista and Idaho Power customers with remote connect/disconnect meters would not receive an on-site visit and, consequently, the utilities would not provide these customers with the opportunity to avoid disconnection by payment at the door or to receive an at-the-door disconnection notice. Since Rocky Mountain Power does not have remote connect/disconnect capable meters, on-site visits are necessary. If the exemption is granted, instead of knocking on customer doors, Rocky Mountain Power would leave an on-site notice informing customers that

⁸ Avista charges a field visit charge of \$16.00 and both Idaho Power and Rocky Mountain Power charge \$20. The charge is assessed if payment is made by the customer to avoid disconnection during a utility field visit to disconnect service.

service has been disconnected and how they can get service restored. Rocky Mountain Power also would no longer accept payment at the door.

Rule 304.02 requires utilities to make a diligent⁹ attempt to contact a customer by phone or in person at least twenty-four (24) hours before the scheduled disconnection. Utility practice has been to both call and make a site visit, except for the few Avista customers who have a remote/disconnect meter. More than one phone call attempt may be necessary to make actual contact with a customer or leave a message. Each utility uses an automatic dialing system to place calls. The system can tell whether a call is not answered or answered by a person, voice mail or answering machine. Utilities may not be able to make actual contact with a customer, but the rule clearly requires utilities to make a serious attempt.

With many more remote connect/disconnect meters in place, coupled with the changes in utility practices being considered in this case (no site visit, knock on the door, or opportunity to pay at the door), making phone contact with customers becomes even more critical. Unfortunately, Avista is the only utility currently making a “diligent” attempt to contact its customers by phone prior to disconnection, making up to seven phone call attempts to contact a customer. Idaho Power makes only one call. Rocky Mountain Power makes only one phone call, but if the Company is aware that a customer has a life-threatening medical condition, two phone calls are made. This is unacceptable. Staff recommends that Idaho Power and Rocky Mountain Power increase the frequency of phone call attempts to no less than three calls made at different times of the day, with at least one made after 6 p.m. for all customers, not just those with remote connect/disconnect meters.

Non-Residential Customers

UCRR 304 also applies to small-commercial customers. See UCRR 300-02. Disconnecting service for these non-residential customers without warning at the time of disconnection poses risks to persons other than the customer. For instance, if a business customer’s employee operates equipment when disconnection occurs, the resulting sudden power loss could damage equipment and possibly cause injury. The business’s customers and employees will be affected. Staff notes that the person who receives bills and notices may not be

⁹ “Webster’s Ninth New Collegiate Dictionary defines “diligent” as “characterized by steady, earnest and energetic application and effort”.

on the premise when disconnection occurs, and employees may not know that disconnection is imminent.

Avista currently has eight non-residential customers with remote connect/disconnect meters, while Idaho Power has 509. Staff recommends that prior to May 1, 2015, Avista and Idaho Power contact non-residential customers with remote connect/disconnect meters in person or by phone to advise the customer that the Company will no longer be visiting the premises to disconnect service and will no longer accept payment at the door. Avista and Idaho Power should also advise customers to take any necessary steps to protect its customers and employees if disconnection is unavoidable. Staff understands that Rocky Mountain Power, which has no remote disconnection meters, will still try to make face-to-face contact at the time of disconnection for non-payment. This additional step will provide an extra safety layer.

Customer Education and Employee Training

Each utility says it will conduct a customer-education campaign to inform only those customers who will be affected by the change in company practices. A major reason cited by both Idaho Power and Rocky Mountain Power for not informing all customers is to avoid confusion for the majority of customers whose bills are not past due or subject to disconnection. In addition, Rocky Mountain Power states that customers who are not past due on their accounts do not like receiving notification about collection-related activity, and are not aware that payment can be made at the door. Further, notification of the change could potentially cause an increase in incoming phone calls and complaints. Staff thus agrees with the utilities' intent to notify only those customers who will be impacted by the change.

Rocky Mountain Power provided the most detailed description of its communication campaign. Staff believes the comprehensive proposal outlined by Rocky Mountain Power provides a good model for educating employees and customers about the proposed change. Rocky Mountain Power says it will include a message¹⁰ on bills with past due account balances, and on the initial past due reminder notices and final disconnection notices. Further, a 3x5 card in English and Spanish stating that Rocky Mountain no longer accepts payment at the door will

¹⁰ Message reads as follows: "Rocky Mountain Power employees no longer accept payments at your home or business for safety reasons. Several payment options are available. Learn more at rockymountainpower.net/pay or call 1-888-221-7070."

be stapled to a door hanger at the premises 48-hours before the disconnection date. On the day of disconnection, any customer answering a door knock will be verbally told of the change and handed a 3x5 card. If customer contact is not made on the day of disconnection, a second card will be stapled to a door hanger and left at the residence.¹¹ Call Center representatives will inform customers of the new process when contacted by customers who have a past due balance that are asking about payment arrangements or where to pay. Field metering specialists will undergo additional training to handle customer questions and concerns.¹²

After field metering specialists stop knocking on doors to verbally communicate with customers, Rocky Mountain Power will continue to inform customers of the change. After implementation, communication will continue through the use of a message on bills with past due account balances, on the initial past due reminder and final disconnection notices, 3x5 cards, door hangers, and customer interaction with customer service representatives and field metering specialists.

Staff believes that training call center and field personnel about the reason for the change and the resulting benefits will help ensure a smooth transition. Additionally, educating customers with past due balances who initiate contact with the utility prior to implementation, will help reduce confusion and the number of inquiries. Staff recommends that the Commission direct Avista and Idaho Power to implement a customer-education campaign like that proposed by Rocky Mountain Power, and to submit those plans to the Commission within 14 days after Commission's order issues. At a minimum, each company must:

- Prior to implementing the change in utility practices, provide field personnel and customer service representatives with additional training for handling customer questions and concerns;

¹¹ In the fall of 2015, when the door hanger is due for an annual review and reprinting, the door hanger will be updated to include the message that is contained on the 3x5 card. The 3x5 card inventory will be used until depleted.

¹² A special training session will be held to inform the field metering specialists of the change, why the change is being made, and their role in the campaign. Metering Managers will periodically accompany specialists to ensure customers are being informed of the change and to evaluate how receptive customers are to the change.

- Prior to implementation and for at least one (1) year thereafter, do the following:

Provide information regarding the change in utility practices to customers who contact the Company about either a past due balance, a payment arrangement, where to make a payment, or a pending disconnection;

Include a message regarding the change in utility practices in customer bills with past due account balances, on the initial past due notice and final disconnection notice; and

Inform customers of the change in utility practices when contacting a customer by phone prior to disconnection.

Currently, Avista uses a special notice developed for its pilot program to provide information to customers at the time a remote connect/disconnect device is installed. When reviewing complaints regarding Avista's pilot program, Staff found that the notice caused some customer apprehension about the new meter.

Idaho Power does not intend to advise customers at locations where it has installed meters with remote connect/disconnect capability of the new meter's functionality or how or why it will be used in the future. Staff believes it is not necessary to notify a customer about the connect/disconnect meter or device at the time of installation and recommends that Avista be given the option to discontinue doing so. Staff believes it is better to focus customer communication on the change in practices rather than on metering technology.

Field Visits During the Moratorium

Idaho Power intends to make field visits during the winter moratorium¹³ to knock on a customer's door before disconnecting the customer for non-payment regardless of the meter type. Avista does not intend to do so for its remote connect/disconnect customers. Avista field employees will continue to knock only at premises without remote disconnection capability before disconnecting service for non-payment.

¹³ During the months of December through February service cannot be terminated for any residential customer who declares the he or she is unable to pay their utility bill in full and whose household includes children under the age of eighteen (18), elderly, sixty-two (62) years or older, or the infirm whose physical health or safety would be seriously impaired with termination of service.

Rocky Mountain Power will no longer knock on a customer's door, regardless of the time of year, for disconnection due to non-payment. In response to Staff Production Request No. 14, Barbara Coughlin stated:

The Company has requested exemption to UCRR 311 to establish a consistent no-knock policy for residential customers throughout the year. Implementing a policy in knocking part of the year would reduce the overall effectiveness of this initiative. This will allow Company employees to be consistent with their approach and will give customers confidence in how the Company conducts business. A change in the process during the year could result in confusion, and an increase in customer frustration after the Company stops knocking after the moratorium.

Staff agrees with Rocky Mountain Power and recommends that a consistent no-knock policy be followed throughout the year for Avista and Idaho Power's customers with remote connect/reconnect meters, and for all Rocky Mountain Power's customers.

Reconnection Charges

Presently, the amount of a reconnection charge to restore service depends on when the customer makes the reconnection request. Customers who place a reconnection request outside of a company's normal business day or business hours are charged a higher reconnect fee. Attachment 4 describes in greater detail each utility's reconnection charges.

Avista and Idaho Power propose to reduce the reconnection charge for customers with a remote connect/disconnect meter. In its pilot program, Avista reduced its reconnect charges by fifty percent (50%) for affected customers. Requests made during business hours were reduced to \$12; after business hours and weekend/holiday charges were \$24. Avista intends to continue to charge these reduced fees. Idaho Power proposes to reduce its reconnect charge to \$13 regardless of when a request for reconnection is received. Rocky Mountain Power does not have remote connect/reconnect meters; therefore, no proposal was offered for a reduction in the reconnection charge. Neither Avista nor Idaho Power provided detailed cost justification for their proposed reduction in reconnection charges.

Staff recommends that Avista charge the same reconnection fee (\$12) regardless of when a customer makes a reconnection request. With that exception, Staff would accept the proposed reduced reconnection charges at this time. The proposed charges provide cost savings to affected customers, but the charges are still high enough to encourage customers to avoid disconnection. After the new procedures have been implemented and the cost of remote

reconnection is better known, Staff will reexamine the appropriateness of the reconnection charges.

Implementation Date

The utilities ask the Commission to approve the exemption by December 31, 2014, with the change in practices to be implemented at the end of winter moratorium on March 1, 2015. Customers who declare winter protection are at a higher risk of disconnection for non-payment at the end of the moratorium period. Even customers who have not received winter protection may have difficulty paying high winter bills and face the possibility of disconnection. Staff believes that the utilities should not implement the new process, in which there is no knock and payment can no longer be made at the doors, until the moratorium ends. Staff recommends a May 1, 2015, implementation date to allow additional time for the utilities to educate employees and customers who will be impacted by the change.

Customer Comments

Customers were given until December 10, 2014 to file comments. As of December 10, 2014, one customer submitted written comments to the Commission. The customer states that people who live paycheck to paycheck are good at budgeting for pre-paid commodities such as food and gas, but are often challenged in budgeting for electricity. The customer believes being able to prepay for usage could potentially prompt customers to monitor usage and conserve energy. As a result, the need for on-site disconnection visits would decrease, and both utilities and customers would achieve cost savings.

Although none of the regulated electric utilities in Idaho have a pre-paid metering system in place, Staff notes that customers can pre-pay for service, make payments at intervals other than just monthly, or set up a level payment plan. Avista and Idaho Power customers have on-line access to usage information as well.

STAFF RECOMMENDATIONS

Staff recommends that the Commission:

1. Exempt Avista, Idaho Power and Rocky Mountain Power from UCRR 311.04 and .05;
2. Require each utility to comply with UCRR 304.02 and provide adequate notice before disconnection by increasing the number of call attempts to three or more;

3. Require Avista and Idaho Power to submit a detailed employee training and customer education plan, similar to that of Rocky Mountain Power, within 14 days of issuance of the Commission's order;

4. Require Avista and Idaho Power to make contact in person or by phone with non-residential customers who have remote connect/disconnect meters prior to May 1, 2015, to advise the customers that the Company will no longer be visiting the premises to disconnect service, will no longer accept payment at the door, and the business should take steps to protect its customers and employees;

5. Approve reconnection charges of \$12 for Avista and \$13 for Idaho Power applicable to locations with remote connect/disconnect meters;

6. Require a consistent no-knock policy be followed throughout the year for both Avista and Idaho Power's customers with remote connect/reconnect meters, and for all Rocky Mountain Power's customers; and

7. Authorize Avista to discontinue its practice of notifying customers about the connect/disconnect meter at the time of installation.

8. Direct Avista, Idaho Power and Rocky Mountain Power to implement the approved changes to their business practices effective May 1, 2015.

Respectfully submitted this 10th day of December 2014.



Karl T. Klein
Deputy Attorney General

Technical Staff: Beverly Barker
Curtis Thaden

i:umisc/comments/gnru14.1kkbabet comments

Disconnection Notification Process

Current	Avista	Idaho Power	Rocky Mountain Power
Monthly Bill	X	X	X
Initial (7-day) Past-Due Notice	X	X	X ⁽¹⁾
Final (3-day) Disconnect Notice	X	X	X
48-hour door hanger			X
24-hour in person and/or telephone notification	X	X	X ⁽²⁾
Knock & door hanger at time of disconnection	X	X	X

Proposed	Avista	Idaho Power	Rocky Mountain Power
Monthly Bill	X	X	X
Initial (7-day) Past-Due Notice	X	X	X ⁽¹⁾
Final (3-day) Disconnect Notice	X	X	X
48-hour door hanger and phone call			X
24-Hour in person and/or telephone notification	X	X	X ⁽²⁾
At time of disconnection			
No knock on door or door hanger (<u>remote</u> disconnect)	X	X ⁽³⁾	N/A ⁽⁴⁾
Knock on door & door hanger (<u>manual</u> disconnect)	X	X	
No knock on door but door hanger (<u>manual</u> disconnect)			X

- ⁽¹⁾ Paperless billing customers receive a past due notice by email only. A second email reminder is sent 48-hours prior to disconnection date.
- ⁽²⁾ Customers known to have a life-threatening medical condition receive an additional site visit and telephone call prior to disconnection.
- ⁽³⁾ Will knock on door during Winter Moratorium (December, January, February).
- ⁽⁴⁾ Rocky Mountain Power does not have meters with remote disconnect capability.

Note: yellow highlight indicates changes to current process.

PAYMENT OPTIONS

Avista	Idaho Power	Intermountain Gas	Rocky Mountain Power
--------	-------------	-------------------	----------------------

CHECKS BY PHONE

Vendor	Kubra	NCO ePayments	Bill Matrix	Bill Matrix
Transaction Fee	\$3.50, unless enrolled ⁽¹⁾	\$2.85	\$2.75	\$1.95 ⁽²⁾
Transaction Cap	\$10,000	\$250,000	\$600	\$600 ⁽²⁾

CREDIT AND DEBIT CARDS BY PHONE

Vendor	Kubra	NCO ePayments	Bill Matrix	Bill Matrix
Transaction Fee	\$3.50	\$2.85	\$2.75	\$1.95 ⁽²⁾
Transaction Cap	\$3,000 ⁽⁸⁾	\$2,500 ⁽³⁾	\$600	\$600 ⁽²⁾

AUTHORIZED PAY STATIONS

Vendor	Multiple Vendors	Western Union	Western Union	CheckFreePay
Transaction Fee	Free	Free	\$1.00	\$1.00 ⁽⁶⁾
Transaction Cap	\$2,500	\$2,500 per cust per day	\$2,500	No Cap

E-BILLING WITH FREE PAYMENT OPTION

Vendor	APS (Auto Pymt Service)	CheckFree	IGC	RMP
Transaction Fee	Free	Free	Free	Free

ONLINE PAYMENTS AT COMPANY WEB SITE

Vendor	Kubra	NCO ePayments	IGC	RMP
Transaction Fee	\$3.50, unless enrolled ⁽¹⁾	\$2.85	No fee (checking only) ⁽⁵⁾	No fee (chk or svngs acct)

ONE TIME ONLY ONLINE PAYMENTS AT COMPANY WEB SITE

Transaction Fee	\$3.50, unless enrolled ⁽¹⁾	No fee (checking only)	No fee (checking only) ⁽⁵⁾	No fee (chk or svngs acct)
-----------------	----------------------------------------	------------------------	---------------------------------------	----------------------------

AUTOMATIC WITHDRAWAL FROM CUSTOMER'S FINANCIAL INSTITUTION

Program Name	APS (Auto Pymt Service)	Preferred Pay	Auto Pay	Automatic Payment
Transaction Fee	Free	Free	Free	Free
	Residential and	Residential and	Residential and	Residential and
	Commercial handled same	Commercial handled same	Commercial handled same	Commercial handled same ⁽⁷⁾

OTHER WAYS TO PAY

Dropbox ⁽⁴⁾	Free	Free	Free	Not an option
Mailed Payments	No cost except postage			
Walk-In to office	Not an option	Not an option	Not an option	Not an option

⁽¹⁾ Free if enrolled (checking account only). Call Avista to enroll. \$10,000 limit for payment with check by phone, \$25,000 limit for payment on-line.

⁽²⁾ Residential fee only; Commercial fee is \$4.95 per transaction up to \$1,000.

⁽³⁾ If an Idaho Power Customer Service Representative assists, payment can be as high as \$5,000.

⁽⁴⁾ See individual company websites for a list of drop box locations.

⁽⁵⁾ \$5,000 limit.

⁽⁶⁾ Pay station fee \$1.50 starting in Q1 2015.

⁽⁷⁾ Electronic Data Interchange (EDI) is an additional option for commercial customers.

⁽⁸⁾ Cap is \$3,000 for a standard transaction fee of \$3.50. Any payment above \$3,000 (limit is \$25,000) is subject to a 3% fee.

Note: Fees are not approved by Commission. Fee charged by the vendor, not the utility.

304. REQUIREMENTS FOR NOTICE TO CUSTOMERS BEFORE TERMINATION OF SERVICE (Rule 304).

01. Initial Notice. If the utility intends to terminate service to a customer under Rule 302, the utility shall send to the customer written notice of termination mailed at least seven (7) calendar days before the proposed date of termination. This written notice shall contain the information required by Rule 305.

02. Final Notice. The utility may mail a final written notice to the customer at least three (3) calendar days, excluding weekends and holidays, before the proposed date of termination. Regardless of whether the utility elects to mail a written notice, at least twenty-four (24) hours before the proposed date of termination, the utility shall diligently attempt to contact the customer affected, either in person or by telephone, to advise the customer of the proposed action and steps to take to avoid or delay termination. This final notice shall contain the same information required by Rule 305.

03. Additional Notice. If service is not terminated within twenty-one (21) calendar days after the proposed termination date as specified in a written notice the utility shall again provide notice under Subsections 304.01 and 304.02 if it still intends to terminate service.

04. Failure to Pay. No additional notice of termination is required if, upon receipt of a termination notice, the customer:

- a. Makes a payment arrangement and subsequently fails to keep that arrangement;
- b. Tenders payment with a dishonored check; or
- c. Makes an electronic payment drawn on an account with insufficient funds.

305. CONTENTS OF NOTICE OF INTENT TO TERMINATE SERVICE (Rule 305).

01. Contents of Notice. The written or oral notice of intent to terminate service required by Rule 304 shall state:

- a. The reason(s), citing these rules, why service will be terminated and the proposed date of termination;
- b. Actions the customer may take to avoid termination of service;
- c. That a certificate notifying the utility of a serious illness or medical emergency in the household may delay termination as prescribed by Rule 308;
- d. That an informal or formal complaint concerning termination may be filed with the utility or the Commission, and that service will not be terminated on the ground relating to the dispute between the customer and the utility before resolution of the complaint (the Commission's address and telephone number must be given to the customer); and
- e. That the utility is willing to make payment arrangements (this statement must be in bold print on written notices).
- f. That for purposes of termination, partial payments will be applied toward utility service charges first, unless the customer requests otherwise, and that charges for non-utility services cannot be used as a basis for termination.

02. Additional Requirements for Gas and Electric Utilities. During the months of November, December, January and February, oral and written notices provided by gas and electric utilities to residential customers shall include or be accompanied by an explanation of restrictions on termination of service and the availability of the Winter Payment Plan described in Rule 306.

Reconnection Charges

Reconnection Charge	Avista		Idaho Power ⁽¹⁾		Rocky Mountain Power
	Current	Proposed ⁽²⁾	Current	Proposed ⁽²⁾	
Business Hours	\$24	\$12	\$20	\$13	\$25
After Hours	\$48	\$24	\$45	\$13	\$50
After Hours (late night/early morning)			\$80	\$13	
Weekends/Holidays	\$48	\$24	\$45	\$13	\$50
Weekends/Holidays (late night/early evening)			\$80	\$13	

Business Hours: Avista and Rocky Mountain Power (8:00 am to 4:00 pm). Idaho Power (7:30 am to 6:00 pm).

After Hours: Avista and Rocky Mountain Power (4:00 pm to 7:00 pm). Idaho Power (6:01 pm to 9:00 pm).

After Hours (late night/early morning): Idaho Power (9:01 pm to 7:29 am).

Weekends/Holidays: Avista and Rocky Mountain Power (8:00 am to 4:00 pm). Idaho Power (7:30 am to 9:00 pm).

Weekends/Holidays (late night/early morning): Idaho Power (9:01 pm to 7:29 am).

Note: The reconnection charge is based on when the customer contacts the Company to request reconnection.

Avista & Rocky Mountain Power:

If the customer pays or makes satisfactory arrangements during the hours of 8:00 am to 7:00 pm weekdays, excluding holidays, or 8:00 am to 4 pm, weekends and holidays, reconnect will be done the same day. If payment or arrangements are made at other times, the company will reconnect service the following day, except in the case of medical emergencies and disconnect in error, which will be done the same day.

⁽¹⁾ Applies to Schedules 1, 7 & 9.

⁽²⁾ Reduced reconnection fee only applies to customers with remote connect/disconnect meters. Avista proposes to continue to charge fees approved under its pilot program in Case No. AVU-E-07-09.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 10TH DAY OF DECEMBER 2014, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. GNR-U-14-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

DAVID J MEYER
AVISTA CORPORATION
PO BOX 3727
SPOKANE WA 99220
E-MAIL: david.meyer@avistacorp.com

LINDA GERVAIS
AVISTA CORPORATION
PO BOX 3727
SPOKANE WA 99220
E-MAIL: linda.gervais@avistacorp.com

LISA D NORDSTROM
REGULATORY DOCKETS
IDAHO POWER COMPANY
PO BOX 70
BOISE ID 83707-0070
E-MAIL: lnordstrom@idahopower.com
dockets@idahopower.com

TAMI WHITE
IDAHO POWER COMPANY
PO BOX 70
BOISE ID 83707-0070
E-MAIL: twhite@idahopower.com

DANIEL E SOLANDER
TED WESTON
ROCKY MOUNTAIN POWER CO
201 S MAIN ST STE 2300
SALT LAKE CITY UT 84111
E-MAIL: daniel.solander@pacificorp.com
ted.weston@pacificorp.com
datarequest@pacificorp.com

BARBARA COUGHLIN
PACIFICORP
825 NE MULTNOMAH STE 800
PORTLAND OR 97232
E-MAIL: barbara.coughlin@pacificorp.com



SECRETARY