

**AR 601 – SEVERE WEATHER MORATORIUM ON INVOLUNTARY DISCONNECTIONS  
IDAHO POWER COMPANY’S INFORMAL COMMENTS  
November 23, 2016**

Thank you for the opportunity to provide comments for the Severe Weather Moratorium proposed rule. Idaho Power sincerely appreciates Staff’s efforts with this docket and in particular Staff’s consideration of the Company’s unique service area in Oregon. Idaho Power would like to suggest a modification of language in item (6) to include the following:

(1) Idaho Power proposes to remove the medical certificate holder language from the proposed rule. OAR 860-021-0410 prohibits an energy utility from disconnecting residential service if the customer submits a medical certificate regardless of weather conditions. Including the medical certificates in the proposed rule would result in redundancy in the disconnection requirements. However, to address the needs of infirm customers, Idaho Power proposes to modify the language to include protecting customers under the winter protection program that are infirm. Idaho Power’s current policy allows an infirm person to qualify without a medical certificate during the moratorium period because the medical certificate requires a prolonged time period to complete. A customer that would qualify for a medical certificate would be considered infirm and would be protected under the provisions of the proposed rule.

(2) Idaho Power reviewed the proposed moratorium time frame from December 15<sup>th</sup> through March 15<sup>th</sup> for its Oregon customers and believes the length of the winter protection program is appropriate; however, the Company proposes to shift the program to December through February. Shifting the program to December through February would maximize the protection offered by the program to customers during extreme weather conditions. Idaho Power performed an analysis of the daily temperatures<sup>1</sup> in the cities of Vale, Ontario, and Halfway, three cities with higher elevations in Idaho Power’s service area, from 2000 through 2015. These cities in eastern Oregon experience different weather than cities in central and western Oregon and are more susceptible to extreme cold weather conditions. These are the same cities Idaho Power commented on in its comments in this docket submitted October 12, 2016. Idaho Power found the average maximum temperatures from March 1<sup>st</sup> through March 15<sup>th</sup> to be significantly warmer than the average maximum temperatures from December 1<sup>st</sup> through 15<sup>th</sup>. As shown in the table below, the average temperature from December 1 through December 15 is much colder than the average temperature from March 1 through March 15.

	<b>March 1 - March 15 Avg. High</b>	<b>December 1 - 15 Avg. High</b>
Ontario	58.56	41.69
Halfway	53.57	39.12
Vale	55.17	40.44

Idaho Power proposes using the same length of time overall for the winter protection program, but shifting the period to December through February to provide a moratorium timeframe that gives the highest protection from cold winter weather conditions for its Oregon customers.

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<sup>1</sup> Analysis was performed using data provided by the National Oceanic & Atmospheric Administration.

In regards to Item (5), the local weather reporting station for all localities within Idaho Power's Oregon service territory is the Boise National Weather Station. Idaho Power is not opposed to submitting a compliance filing notifying the Commission designating a weather reporting station.

Regarding an outreach/marketing approach to inform customers of winter protection programs, Idaho Power sends out a brochure with information about the winter protection program each year to its Idaho customers. The brochure is issued with disconnection notices for Idaho customers from November through February informing customers about the winter protection program and the eligibility requirements. Idaho customers that are enrolled in the winter protection program receive subsequent brochures with Final Notices each month encouraging customers to pay a portion of their electric bills to keep the unpaid balance during the winter months as low as possible. Additionally, all disconnection notices inform customers to contact Idaho Power regarding potential payment plans. Customers that contact Idaho Power are informed of the winter protection program. If the rule is adopted, Idaho Power is not opposed to extending its communication notices regarding the winter protection program to its Oregon customers.

Idaho Power has not experienced any difficulties administering its winter protection program and believes having a winter program that protects a household with a child, elderly, or infirm person is a reasonable alternative to a severe weather winter moratorium.

Finally, Idaho Power plans to continue to voluntarily offer its Cold Weather Program to its residential customers. Idaho Power's Cold Weather Program is similar to the Severe Weather Moratorium described in section 1 of the proposed rule. However, as described in its comments submitted October 12, 2016, Idaho Power's Cold Weather Program does not disconnect delinquent accounts during the winter when the forecasted daytime highs do not exceed 25 degrees for three consecutive weekdays or the forecasted night time low falls below 10 degrees on any weekday. Combining the winter protection program with the cold weather program should provide sufficient protection to customers during the winter.

Below please find Idaho Power's suggested edits to the proposed rule language. Once again, thank you for the opportunity to provide comments.

**\*\* NOT FOR PUBLICATION \*\***

**AR 601: The following draft was prepared as a working draft by Staff of the Public Utility Commission of Oregon for purpose of developing proposed rules yet to be drafted, and for the purpose of discussion and review with interested persons. No rules have been approved for publication or for any other use by Staff or the Commission. A notice of proposed rulemaking has not been issued on this subject.**

### **Severe Weather Moratorium on Involuntary Disconnections**

(1) Except as set forth in section (6) of this rule, an energy utility shall implement a moratorium on the disconnection of residential service when a daily high temperature of less than 32 degrees is forecast by the National Weather Service.

(2) An electric utility shall implement a moratorium on the disconnection of residential service when a local Heat Advisory is issued by the National Weather Service.

(3) An energy utility required to implement a moratorium under section (1) or (2) of this rule shall implement the moratorium for a period of not less than 24 hours.

(4) An energy utility shall base the need for a moratorium on data available from the nearest National Weather Service reporting station and need only apply a moratorium to the area covered by that reporting station. The energy utility shall obtain the required forecast data no later than 8:00 a.m. each business day.

(5) Each energy utility shall make an initial filing with the Commission to designate a weather reporting station for each locality in the utility's service area, and shall update its designations as necessary with a supplemental filing.

(6) If an energy utility implements a winter protection program under which a household with a child, an elderly or infirm person, ~~or a medical certificate holder~~ may voluntarily participate if the customer is unable to pay a utility bill and be protected from service disconnection ~~between~~from December ~~15~~ through ~~March 15~~ February 28 of the calendar year, the requirements of section (1) of this rule shall not apply.