

**AR 602 – INVOLUNTARY DISCONNECTION DATA REPORTING POINTS
IDAHO POWER COMPANY’S INFORMAL COMMENTS
August 14, 2017**

Idaho Power Company (“Idaho Power” or “Company”) submits these comments in response to the Public Utility Commission of Oregon (“Commission”) Staff’s (“Staff”) request for comments in Oregon Docket No. AR 602, Rulemaking into Service Disconnection Reports for Energy Utilities. The purpose of AR 602 is to develop an administrative rule to implement a requirement for utilities in the state of Oregon to report on service disconnections in their respective service areas. After the recent workshop held on July 12, 2017, Staff requested that utilities and stakeholders submit comments on the following topics.

Usefulness of Report

Idaho Power supports reporting that is purposeful and provides a benefit to its customers and stakeholders. For example, if it is determined that utility reporting of involuntary disconnections could assist state agencies to identify patterns that would enable them to propose and support adjustments to the Low Income Home Energy Assistance Program (“LIHEAP”) that would result in achieving the overall goal of reducing disconnections for this segment of customers, Idaho Power believes the creation of this reporting requirement would be beneficial.

In the July 12, 2017, workshop, the Community Action Partnership of Oregon (“CAPO”) suggested it will use the report to determine if energy assistance funds should be reassigned to different geographic areas across the state of Oregon; however, CAPO also indicated that funds were reassigned last winter without the existence of utility reporting on disconnects. Idaho Power believes that other data, such as reported visits to local Community Action Partnership (“CAP”) agencies, may be a better indicator of need than a report of disconnections in a certain geographical area.

Sunset Clause

Idaho Power believes including a “sunset clause” in a proposed rule can mitigate the risk of creating a reporting requirement that may not be useful for the Commission or other stakeholders in the long-term. The Company proposes including a sunset clause in the rule that would allow for parties to revisit the need for, scope, and frequency of the reporting requirement and provide for an extension of the reporting requirement following demonstration of an ongoing benefit of the reporting requirement.

Prior to the sunset date identified in the rule, Staff would file a report demonstrating the continued need for a report by including a specific explanation of the direct benefits of the reporting requirement to customers. This report should be informed by Staff, utility, and stakeholder input describing experience with the report and how it has been used. This process will ensure useful reporting and prudent cost management for customers if it is determined that reporting is no longer needed. Idaho Power believes a sunset clause following a two-year reporting period would provide a reasonable amount of time for the Commission, Staff, utilities, and other stakeholders to determine the usefulness of a report.

Data Confidentiality

Idaho Power does not have concerns about the availability of the report for public records purposes so long as all customer information is aggregated to protect individual customers' identities.

What "Assistance" Programs Should Be Included?

Idaho Power is capable of reporting disconnections for customers who have received LIHEAP funds. However, Idaho Power is not capable of reporting disconnections for customers who have received Oregon Energy Assistance Program ("OEAP") funds because the CAP agencies located in Idaho Power's Oregon service area (Communities In Action "CinA" and Community Connections of Northeast Oregon, Inc. "CCNO") do not distribute OEAP funds to Idaho Power customers. Pursuant to ORS 757.601 and ORS 757.612, Idaho Power is exempt from collecting a public purpose charge from its Oregon customers. Idaho Power does not administer the collection of any other mandatory ratepayer-funded energy assistance programs.

Number of Days Until Reconnect

Idaho Power does not believe the number of days between the disconnection of an account and payment is necessarily indicative of the customer's ability to pay, nor does the Company believe this information should be solely relied upon to determine financial need. However, the Company can report on reconnects from the day of disconnection up to seven business days following. After seven business days, a customer's account is closed and a new account number is created if service is re-established after that time period.

The Company recommends using calendar days, rather than business days, as it is a better indicator of customer behavior for reconnecting. While Oregon utilities must reconnect a customer within one business day of satisfying reconnect requirements (OAR 860-021-0328), Idaho Power's practice is to reconnect the same day as the request is made. Idaho Power believes that reporting in business days would overly complicate the process and may add additional time to complete the disconnect reporting.

Areas of Reporting

Idaho Power can report disconnection information by city and/or zip code in its service area. While Idaho Power's Customer Relations and Billing ("CR&B") system contains a field for County, the Company's system does not validate this field, rather it is populated based on customer-supplied information. While Idaho Power could query a report from the County field, Idaho Power cannot validate the accuracy of this information.

Reporting Period Versus the Amount of Data

Idaho Power believes the frequency of the report should be based on how the report will be utilized. In terms of timing of the date the report is due, Idaho Power supports a report being due 30 days after the end of the reporting period.

How Should/Can the Winter Moratorium Be Integrated unto the Report?

Idaho Power recommends waiting until the agencies and utilities have more experience with the new winter moratorium requirements to allow time to determine if incorporating winter moratorium information into the reporting requirement would provide additional value.

Further, because Idaho Power manually identifies severe weather days, there is not a field in the Company's CR&B system that can be queried. Reporting on the number of severe weather days would result in a manual process for Idaho Power and may result in additional time to complete the disconnect reporting.