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April 14, 2017

Public Utility Commission of Oregon  
Filing Center  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97301

**RE: AR 601 – Severe Weather Moratorium on Service Disconnection  
Idaho Power Company’s Comments**

Attention Filing Center:

Idaho Power Company (“Idaho Power” or “Company”) submits the following comments in response to Oregon Administrative Rule 860-021-0407 proposed by the Public Utility Commission of Oregon Staff (“Staff”). Idaho Power supports the rule as written, so long as Section 8 is included to acknowledge the differing weather conditions of Idaho Power’s service area.

**Temperature Threshold:**

The weather conditions of higher elevation cities within Idaho Power’s service area in Oregon could result in multiple severe weather moratorium events each year. As explained in comments submitted by Idaho Power in this docket on October 12, 2016, cities with higher elevations, such as those on the eastern side of the state within Idaho Power’s service area, experience prolonged severe weather conditions. For example, the average temperature in Vale during winter is 30.3 degrees. Thus, a severe weather moratorium could result in a mandatory moratorium for all Idaho Power residential customers during the entirety of winter months. Due to the weather conditions within Idaho Power’s service area, the temperature threshold of 25 degrees in section 8 of the proposed rule would be preferable to help protect customers and better manage winter bills.

**Winter Protection Program:**

Idaho Power currently has a cold weather program available for its Oregon residential customers during the months of December through February similar to the winter protection program in section 8 of the proposed rule. While the cold weather program effectively protects customers during the winter months, it has been the Company’s experience that customers participating in the program have a large past due balance when the moratorium period ends. The average past due balance is approximately \$600 per customer at the end of the moratorium period. These customers often are unable to pay off the entire past due balance amount in full at the end of the moratorium period and enter payment plan arrangements with Idaho Power. Because the large past due balances can often be difficult for customers to manage, Idaho Power believes the moratorium period should both protect customers and mitigate excessive accumulated past due balances.

Idaho Power supports the winter protection program moratorium period from December through February in section 8 of the proposed rule. Below are the average temperatures for three cities in Idaho Power's eastern Oregon service area for the months of January, February, March, October, November, and December according to the monthly normals from the National Oceanic and Atmospheric Administration:

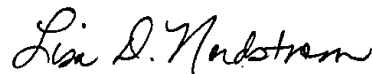
<b>Average Temperatures (Fahrenheit)</b>						
	<b>Jan</b>	<b>Feb</b>	<b>March</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>
Ontario	27.50	33.30	43.40	50.30	37.10	27.80
Halfway	24.80	28.90	39.80	47.50	35.50	25.40
Vale	28.40	34.60	44.30	50.10	37.40	28.30

As the data indicates, temperatures in Idaho Power's service area during the months of March, October, and November would not qualify for the severe weather moratorium and would unnecessarily prolong the moratorium period. The Company believes the three month time period from December through February set forth in the proposed rule maximizes the protection offered by the program to customers during the months most susceptible to extreme cold weather conditions and appropriately mitigates potential large accumulated past due balances associated with prolonged moratorium periods.

Idaho Power has not experienced difficulties administering the winter protection program in its Idaho or Oregon service area for over 20 years and believes the winter protection program provides residential customers reasonable protection during winter months. However, Idaho Power recognizes that a winter protection program may be best implemented after Commission approval. Idaho Power would not be opposed to an amended Section 8 of the proposed rule to include language that would require Commission review and authorization of a winter protection program.

Idaho Power appreciates the efforts of Staff and parties to develop rules that strike an appropriate balance between the health and safety of customers and utility operations for service disconnections and customer account balance collections.

Very truly yours,



Lisa D. Nordstrom

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