



LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

December 31, 2020

VIA ELECTRONIC FILING

PUC.FilingCenter@state.or.us

Re: Docket No. UM 1631
Idaho Power Company's Petition for Partial Waiver of OAR 860-021-0410(2) and
OAR 860-021-0415(2) and (3)

Attention Filing Center:

Enclosed for filing in Docket No. UM 1631 is an electronic copy of Idaho Power Company's Petition for Partial Waiver of OAR 860-021-0410(2) and OAR 860-021-0415(2) and (3) consistent with Paragraphs 5 (TPAs) and 16 (medical certificates) of the Stipulated Agreement on the Effects of COVID-19 Pandemic on Energy Utility Customers approved by the Commission in Order No. 20-401 of Docket UM 2114 on November, 5, 2020.

Idaho Power requests that the temporary, partial waiver of these OARs be approved by April 1, 2021, and remain in effect until October 1, 2022, as noted in the Stipulation Agreement, or unless and until any permanent changes are made to these rules.

If you have any questions regarding this filing, please contact Regulatory Analyst Riley Maloney at 208-388-5418 or rmaloney@idahopower.com.

Sincerely,

A handwritten signature in black ink that reads "Lisa D. Nordstrom".

Lisa D. Nordstrom

LDN:sib
Enclosure

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1631**

In the Matter of Idaho Power Company's
Petition for Partial Waiver of OAR 860-021-
0410 and OAR 860-021-0415.

**IDAHO POWER COMPANY'S PETITION
FOR PARTIAL WAIVER**

Pursuant to ORS 756.040 and OAR 860-021-0005, Idaho Power Company ("Idaho Power" or "Company") respectfully requests that the Public Utility Commission of Oregon ("Commission") grant a temporary, partial waiver of OAR 860-21-0410, Emergency Medical Certificate for Residential Electric and Gas Service, and OAR 860-021-0415, Time Payment Agreements for Residential Electric and Gas Service. Specifically, the Company requests partial waiver of subsection (2) of OAR 860-021-0410, which requires that a medical certification to the utility be confirmed in writing within 14 days by the qualified medical professional prescribing medical care, and subsections (2) and (3) of OAR 860-021-0415, which limits the timeframe for time-payment arrangements to 12 months and requires a down payment for such arrangements.

This temporary waiver request is made in accordance with Paragraphs 5 (Time Payment Arrangements) and 16 (medical certificates) of the Stipulated Agreement on the Effects of COVID-19 Pandemic on Energy Utility Customers (Stipulated Agreement), as approved by the Commission in Order No. 20-401 of Docket UM 2114 on November, 5, 2020. As such, Idaho Power hereby respectfully requests that the temporary, partial waivers of OAR 860-021-0410 and OAR 860-21-0415 be approved by April 1, 2021, and remain in effect until October 1, 2022, as noted in the Stipulation Agreement, or unless and until any permanent changes are made to these rules.

1 Communications regarding this Petition should be addressed to:

2 Lisa D. Nordstrom
3 Idaho Power Company
4 1221 West Idaho Street (83702)
5 P.O. Box 70
6 Boise, Idaho 83707
7 lnordstrom@idahopower.com

8 Connie Aschenbrenner
9 Idaho Power Company
10 1221 West Idaho Street (83702)
11 P.O. Box 70
12 Boise, Idaho 83707
13 caschenbrenner@idahopower.com

14 Regulatory Dockets
15 Idaho Power Company
16 1221 West Idaho Street (83702)
17 P.O. Box 70
18 Boise, Idaho 83707
19 dockets@idahopower.com

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21 **I. BACKGROUND**

22 On June 9, 2020, the Commission conducted a Special Public Meeting on the topic
23 of the “Impact to Utility Customers during the COVID-19 Pandemic and Future Economic
24 Recovery.” During this public meeting, the Commission heard from investor-owned utilities,
25 customer groups, and other stakeholders regarding the impacts of the COVID-19 pandemic,
26 including actions already taken by the utilities, as well as additional actions still needed to
protect customers during the COVID-19 health and economic crisis. The Commission then
assembled a team of representatives from across the state, led by Commission Staff, to
address various aspects of the COVID-19 challenge.

At the request of Commission Staff, Docket No. UM 2114 – Investigation into the
Effects of COVID-19 Pandemic on Utility Customers, was opened to assist in these efforts.
After a thorough investigation consisting of data collection and workshops between June 30,
2020 and September 3, 2020, Commission Staff released its final report on September 21,
2020, including Appendix A, which is a term sheet for energy utilities containing basic terms
and conditions to address the disconnection of utility services and the imposition of late fees
due to the COVID-19 pandemic.

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1 Stipulated Agreement requires each utility to offer up to 24 months to
2 residential customers with no down payment through October 1, 2022. Each
3 utility may wish to request a temporary waiver of sections (2) and (3) of this
4 rule through October 1, 2022, unless and until any permanent changes may
5 be made to this rule. [Emphasis added]

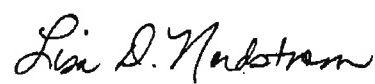
6 Granting a temporary, partial waiver of OAR 860-21-0410, Emergency Medical
7 Certificate for Residential Electric and Gas Service, and OAR 860-021-0415, Time Payment
8 Agreements for Residential Electric and Gas Service, will allow implementation of the
9 Stipulated Agreement in Docket UM 2114.

10 **III. CONCLUSION**

11 Idaho Power respectfully requests that the Commission issue an order approving the
12 Company's request for temporary, partial waiver of OAR 860-021-0410(2) and OAR 860-
13 021-0415(2) and (3) through October 1, 2022, effective immediately upon Commission
14 approval.

15 DATED: December 31, 2020

IDAHO POWER COMPANY



LISA D. NORDSTROM
Attorney for Idaho Power Company