

LISA D. NORDSTROM Lead Counsel Inordstrom@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,

Lin D. Madotrom

Lisa D. Nordstrom

LDN:slb Enclosure

1	BEFORE THE PUBLIC U	TILITY COMMISSION
2	OF OREGON	
3	UM 16	331
4		1
5	In the Matter of Idaho Power Company's	IDAHO POWER COMPANY'S PETITION
6	Petition for Partial Waiver of OAR 860-021- 0410 and OAR 860-021-0415.	FOR PARTIAL WAIVER
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8 Pursuant to ORS 756.040 and OAR 860-021-0005, Idaho Power Company ("Idaho 9 Power" or "Company") respectfully requests that the Public Utility Commission of Oregon 10 ("Commission") grant a temporary, partial waiver of OAR 860-21-0410, Emergency Medical 11 Certificate for Residential Electric and Gas Service, and OAR 860-021-0415, Time Payment 12 Agreements for Residential Electric and Gas Service. Specifically, the Company requests 13 partial waiver of subsection (2) of OAR 860-021-0410, which requires that a medical 14 certification to the utility be confirmed in writing within 14 days by the gualified medical 15 professional prescribing medical care, and subsections (2) and (3) of OAR 860-021-0415, 16 which limits the timeframe for time-payment arrangements to 12 months and requires a down 17 payment for such arrangements.

18 This temporary waiver request is made in accordance with Paragraphs 5 (Time 19 Payment Arrangements) and 16 (medical certificates) of the Stipulated Agreement on the 20 Effects of COVID-19 Pandemic on Energy Utility Customers (Stipulated Agreement), as 21 approved by the Commission in Order No. 20-401 of Docket UM 2114 on November, 5, 2020. 22 As such, Idaho Power hereby respectfully requests that the temporary, partial waivers of 23 OAR 860-021-0410 and OAR 860-21-0415 be approved by April 1, 2021, and remain in effect 24 until October 1, 2022, as noted in the Stipulation Agreement, or unless and until any 25 permanent changes are made to these rules.

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1	Communications regarding this Petition should be addressed to:	
2	Lisa D. Nordstrom Connie Aschenbrenner	
3	Idaho Power Company Idaho Power Company 1221 West Idaho Street (83702) 1221 West Idaho Street (83702)	
4	P.O. Box 70 Boise, Idaho 83707 P.O. Box 70 Boise, Idaho 83707	
5	Inordstrom@idahopower.com caschenbrenner@idahopower.com	
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10	I. <u>BACKGROUND</u>	
11	On June 9, 2020, the Commission conducted a Special Public Meeting on the topic	
12	of the "Impact to Utility Customers during the COVID-19 Pandemic and Future Economic	
13	Recovery." During this public meeting, the Commission heard from investor-owned utilities,	
14	customer groups, and other stakeholders regarding the impacts of the COVID-19 pandemic,	
15	including actions already taken by the utilities, as well as additional actions still needed to	
16	protect customers during the COVID-19 health and economic crisis. The Commission then	
17	assembled a team of representatives from across the state, led by Commission Staff, to	
18	address various aspects of the COVID-19 challenge.	
19	At the request of Commission Staff, Docket No. UM 2114 – Investigation into the	
20	Effects of COV/ID 40 Decidencia on Lifelity Outbourgers and a second to second in these offects	

. ation into the 20 Effects of COVID-19 Pandemic on Utility Customers, was opened to assist in these efforts. 21 After a thorough investigation consisting of data collection and workshops between June 30, 22 2020 and September 3, 2020, Commission Staff released its final report on September 21, 23 2020, including Appendix A, which is a term sheet for energy utilities containing basic terms 24 and conditions to address the disconnection of utility services and the imposition of late fees

25 due to the COVID-19 pandemic.

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1 On September 24, 2020, the Commission authorized Staff, affected utilities and 2 stakeholders to execute stipulations incorporating the term sheet that was developed during 3 the UM 2114 investigation. Between September 24, 2020 and October 23, 2020, Avista 4 Utilities, Cascade Natural Gas Company, Idaho Power Company, NW Natural, Pacific Power, 5 Portland General Electric Company, Commission Staff, Oregon Citizens' Utility Board, Community Action Partnership of Oregon, Northwest Energy Coalition, Verde, and 6 7 Multhomah County Office of Sustainability (collectively, the "Parties") helped to refine the 8 term sheet for energy utilities and incorporate it into a Stipulated Agreement to assist 9 customers and utilities during the COVID-19 pandemic and its aftermath.

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II. DISCUSSION

11 At the Commission's November 3, 2020 Public Meeting, Commission Staff presented

12 its final discussion and recommendations regarding the approval of the Stipulated Agreement

13 endorsed by the Parties, which the Commission ultimately adopted in Order No. 20-401. At

14 the time, Commission Staff also provided comments regarding potential energy utility action

15 that may be required as a result of the Stipulated Agreement's impact on implementation of

16 various administrative rules. In its Staff Report for the November 3, 2020 Public Meeting,

17 Commission Staff stated:

18 OAR 860-021-0410, Emergency Medical Certificate for Residential Electric and Gas Service - Action required by all utilities. Under OAR 860-021-19 0410(2), a medical certification to the utility must be confirmed in writing within 14 days by the qualified medical professional prescribing medical care. This 20 rule differs from the requirements of paragraph 16 of the Stipulated Agreement, which allows for two months to submit the confirming certification. 21 Because this paragraph will be in effect until October 1, 2022, a temporary rule would not be appropriate. Each utility will need to request a temporary 22 waiver of the rule through October 1, 2022, unless and until any permanent changes may be made to this rule. [Emphasis added] 23

24 <u>OAR 860-021-0415, Time-Payment Agreements for Residential Electric and</u>
24 <u>Gas Service</u> – Under sections (2) and (3) of this rule, payment plans are limited to 12-month periods and a down payment is required. Under section (4), "The energy utility and customer may agree in writing to alternate payment arrangement, provided the utility first informs the customer of the availability of the payment terms in sections (2) and (3) of this rule." Paragraph 5 of the

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Idaho Power Company 1221 West Idaho Street Boise, ID 83702

1 2 3	Stipulated Agreement requires each utility to offer up to 24 months to residential customers with no down payment through October 1, 2022. <u>Each utility may wish to request a temporary waiver of sections (2) and (3) of this rule through October 1, 2022, unless and until any permanent changes may be made to this rule.</u> [Emphasis added]
4	Granting a temporary, partial waiver of OAR 860-21-0410, Emergency Medical
5	Certificate for Residential Electric and Gas Service, and OAR 860-021-0415, Time Payment
6	Agreements for Residential Electric and Gas Service, will allow implementation of the
7	Stipulated Agreement in Docket UM 2114.
8	III. <u>CONCLUSION</u>
9	Idaho Power respectfully requests that the Commission issue an order approving the
10	Company's request for temporary, partial waiver of OAR 860-021-0410(2) and OAR 860-
11	021-0415(2) and (3) through October 1, 2022, effective immediately upon Commission
12	approval.
13	DATED: December 31, 2020 IDAHO POWER COMPANY
14 15	Lin D. Madotrom
16	LISA D. NORDSTROM Attorney for Idaho Power Company
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