

LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

February 2, 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 on Final Draft Rule**

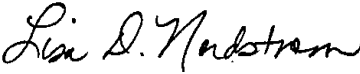
Attention Filing Center:

Idaho Power Company (“Idaho Power”) submits the following comments in response to the Final Draft Rule proposed by the Public Utility Commission of Oregon Staff.

Idaho Power has no objections to the proposed rule, but has a suggested revision to the end date in section (7). A redline version showing the proposed revision is attached. Idaho Power’s winter protection program currently in effect protects customers described in section (7) of the proposed rule December through February. Idaho Power recommends clarifying the time period in the proposed rule for the winter protection program from December through February. The recommended change would align the time period in the proposed rule with Idaho Power’s currently effective winter protection program.

Idaho Power appreciates the opportunity to provide comments in this docket and believes protecting its customers during severe weather is an important business practice.

Very truly yours,



Lisa D. Nordstrom

LDN/kkt

Enclosure

**** NOT FOR PUBLICATION ****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 (7) of this rule, an energy utility must put into effect a moratorium on the disconnection of residential service for non-payment on any day a high temperature of less than 32 degrees is forecast by the applicable weather reporting service.

(2) An electric utility must put into effect a moratorium on the disconnection of residential service for non-payment on any day a local Heat Advisory is issued by the applicable weather reporting service.

(3) Any moratorium activated as a result of section (1) or section (2) of this rule must remain in effect for not less than 24 hours.

(4) An energy utility must base the need for a moratorium on data available from the National Weather Service, or another weather reporting service that may be designated by the utility, and need only apply a moratorium to the geographic area that meets the conditions in section (1) and section (2) of this rule.

(5) The energy utility must obtain the required forecast data no later than 8:00 a.m. each business day.

(6) Each energy utility must notify the Commission's Consumer Service Section which weather reporting service it will utilize in each geographic area served by the utility in complying with the requirements of this rule.

(7) If an energy utility offers a winter protection program under which a household with an unemancipated minor under the age of 18, an individual age 65 or older, or infirm person may participate and be protected from service disconnection from December 1 through ~~March 1~~February, the temperature threshold specified in section (1) of this rule is 25 degrees. For purposes of this section, "infirm person" refers to an individual having a condition of weakness or illness that affects the individual's ability to maintain a state of health when exposed to extreme temperatures.