e-FILING REPORT COVER SHEET

| REPORT NAME: | Report on Mitigation Efforts to Prevent Disconnects |
|---|--|
| COMPANY NAME: | Idaho Power Company |
| If yes, please s | NTAIN CONFIDENTIAL INFORMATION? No Yes submit only the cover letter electronically. Submit confidential information 001-0070 or the terms of an applicable protective order. |
| If known, please selec | et designation: RE (Electric) RG (Gas) RW (Water) RO (Other) |
| Report is required by: | ☐ OAR ☐ Statute ☐ Order ☐ Other House Bill 2599 |
| Is this report associated If Yes, enter d | ed with a specific docket/case? No Yes ocket number: |
| Key words: | |
| If known, please selec | et the PUC Section to which the report should be directed: |
| Corporate | Analysis and Water Regulation |
| Economic | and Policy Analysis |
| Electric an | d Natural Gas Revenue Requirements |
| Electric Ra | ites and Planning |
| Natural Ga | s Rates and Planning |
| Utility Safe | ety, Reliability & Security |
| Administra | ative Hearings Division |
| Consumer | Services Section |

PLEASE NOTE: Do NOT use this form or e-filing with the PUC Filing Center for:

- Annual Fee Statement form and payment remittance or
- OUS or RSPF Surcharge form or surcharge remittance or
- Any other Telecommunications Reporting or
- Any daily safety or safety incident reports or
- Accident reports required by ORS 654.715.



LISA D. NORDSTROM Lead Counsel Inordstrom@idahopower.com

October 30, 2015

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

RE: House Bill 2599 – Report on Mitigation Efforts to Prevent Disconnects

Attention Filing Center:

On June 11, 2015, House Bill 2599 ("HB 2599") was signed into law. A portion of the bill directed regulated utilities to file a report with the Public Utility Commission of Oregon ("Commission") no later than November 1, 2015. Per HB 2599, the report must include:

- (2) Each utility that provides electric or natural gas service to residential customers shall prepare a report on the utility's processes that mitigate, for nonpayment of a delinquent account, the termination of electric or natural gas service to a residential customer belonging to a protected class if the termination would occur:
 - (a) During the heating season;
- (b) On any date for which the National Weather Service forecasts that the temperature of a location both within this state and the service territory of the utility will exceed 100 degrees Fahrenheit for a period of 12 or more hours; or
- (c) On any date for which the National Weather Service forecasts that the temperature of a location both within this state and the service territory of the utility will be less than 32 degrees Fahrenheit for a period of 12 or more hours.
- (3) A public utility, as defined in ORS 757.005, that provides electric or natural gas services to residential customers shall submit the report described in subsection (2) of this section to the Public Utility Commission no later than November 1, 2015.

In this report, Idaho Power Company ("Idaho Power" or "Company") responds with the mitigation efforts to prevent disconnections as required by HB 2599.

Public Utility Commission of Oregon Filing Center October 30, 2015 Page 2

Winter Protection Program

During the heating season, Idaho Power has a Winter Protection Program that allows for a moratorium on service termination from December 1st to March 1st for customers who declare they are unable to pay their account balance in full and who have children (persons 18 and under), elderly (persons 62 and older), or infirm (persons whose health or safety would be seriously impaired by termination of service) living in the house. When the Winter Protection Program ends on March 1, customers are eligible to enter into payment arrangements to ensure continued service.

Extreme Weather Conditions

In addition to the Winter Protection Program, Idaho Power also uses Company-determined best practices for defining extreme weather conditions that provide for exceptions to terminating electric service of a residential customer. Idaho Power uses its own parameters to define extreme weather due to the varied composition of its service territory. The Company's service territory in Oregon consists of rural areas where the weather conditions typically exceed the parameters described in HB 2599. For example, temperatures in the cities of Vale and Baker may not exceed 32 degrees for the entire months of December and January. Furthermore, temperatures in the city of Ontario may be above 100 degrees for much of the summer months. Allowing customers to continue using electricity for months at a time regardless of their past due status could lead to increased billing balances in arrears that customers may find difficult or impossible to pay at the end of the moratorium period or extreme weather periods.

Idaho Power's extreme cold weather parameters are met when forecasted daytime highs do not exceed 25 degrees for three consecutive weekdays or the forecasted night time lows fall below 10 degrees on any weekday. Idaho Power's extreme hot weather parameters are met when forecasted daytime highs exceed 105 degrees for three consecutive weekdays or the forecasted daytime high is above 110 degrees on any weekday. In addition to those extreme weather parameters, Idaho Power may consider other factors such as inversions, mountain locations, etc. These other factors may provide for a plus or minus 5 degrees for customers in those locations in addition to the existing parameters.

Staff-Requested Data

In addition to the HB 2599 information, Commission Staff issued a letter dated August 4, 2015, requesting the following:

- 1. A monthly breakdown for calendar years 2013, 2014, and year-to-date 2015 of the number of disconnections for:
 - a. Non-payment of a delinquent bill
 - b. Non-payment of a deposit or deposit installment
 - c. Failure to abide by terms of a Time Payment Arrangement (TPA)

Public Utility Commission of Oregon Filing Center October 30, 2015 Page 3

- 2. If possible, this information should be further broken down by group to include:
 - a. Low Income Home Energy Assistant Program ("LIHEAP")/Oregon Energy Assistance Program ("OEAP") recipients
 - b. Emergency Medical Certificate holders
 - c. Other customers who are not LIHEAP/OEAP recipients

And if the data is available, by:

- d. Household income
- e. Senior status
- 3. The report should also show (by month) the number of customers 60-days in arrears and total dollars 60-days in arrears.

Please see the attached Excel spreadsheet for this additional information. The Company does not track household income or the age of customers. The Company's Customer Relationship and Billing System ("CR&B") was implemented in September of 2013 and detailed information regarding specific disconnection reasons is unavailable prior to the implementation date.

If you have any questions about this information, please contact Zach Harris, Regulatory Analyst, at (208) 388-2305 or zharris@idahopower.com.

Very truly yours,

Lisa D. Nordstrom

Lin D. Madstrom

LDN/kkt

Enclosure

cc: Kim Dixon

Maggie Brilz

Idaho Power Company HB 2599 Commission Staff Requested Report

Monthly Breakdown of Number of Disconnections

| Month | Total Number of Disconnections | Non-Payment of Delinquent Bill (1a) | LIHEAP/OEAP* (2a) | Medical Certificate (2b) | Other Customers (2c) | Non-Payment of Deposit (1b) | LIHEAP/OEAP* (2a) | Medical Certificate (2b) | Other Customers (2c) | Failure to Abide by TPA (1c) | LIHEAP/OEAP* (2a) | Medical Certificate (2b) | Other Customers (2c) |
|--------|-----------------------------------|---|----------------------|-----------------------------|----------------------------|-----------------------------------|----------------------|--------------------------------|----------------------------|------------------------------------|----------------------|--------------------------------|----------------------------|
| Jan-13 | 47 | | NA | NA | NA | | NA | NA | NA | NA | NA | NA | NA |
| Feb-13 | 57 | | NA | NA | NA | | NA | NA | NA | NA | NA | NA | NA |
| Mar-13 | 89 | | NA | NA | NA | | NA | NA | NA | NA | NA | NA | NA |
| Apr-13 | 113 | | NA | NA | NA | | NA | NA | NA | NA | NA | NA | NA |
| May-13 | 91 | NA | NA | NA | NA | | NA | NA | NA | NA | NA | NA | NA |
| Jun-13 | 77 | | NA | NA | NA | | NA | NA | NA | NA | NA | NA | NA |
| Jul-13 | 68 | | NA | NA | NA | | NA | NA | NA | NA | NA | NA | NA |
| Aug-13 | 64 | | NA | NA | NA | | NA | NA | NA | NA | NA | NA | NA |
| Sep-13 | 0 | | 0 | 0 | 0 | | 0 | 0 | 0 | | - | 0 | 0 |
| Oct-13 | 0 | | 0 | 0 | 0 | | 0 | 0 | 0 | - | - | 0 | 0 |
| Nov-13 | 90 | | 20 | 0 | 14 | | 0 | 0 | 0 | | | 1 | 31 |
| Dec-13 | 26 | | 6 | 0 | 12 | | 0 | 0 | 0 | | V | 0 | 3 |
| Jan-14 | 58 | | 21 | 0 | 14 | | - | 0 | 0 | | | 0 | 8 |
| Feb-14 | 58 | | 26 | 0 | 16 | | 0 | 0 | 0 | 16 | | 0 | 11 |
| Mar-14 | 110 | | 35 | 1 | 32 | | 0 | 0 | 0 | | 19 | 1 | 22 |
| Apr-14 | 86 | | 35 | 0 | 21 | | 0 | 0 | 0 | 0 | 15 | 1 | 14 |
| May-14 | 71 | 37 | 30 | 0 | 7 | U | 0 | 0 | 0 | 34 | 17 | 1 | 16 |
| Jun-14 | 75 | | 23 | 0 | 0 | | 0 | 0 | 0 | | 29 | 0 | 23 |
| Jul-14 | 75 | | 19 | 0 | 20 | | 0 | 0 | 0 | | | 2 | 12 |
| Aug-14 | 89 | | 34 | 0 | 27 | | 0 | 0 | 0 | | | 0 | 9 |
| Sep-14 | 97 | | 24 | 0 | 32 | | 0 | 0 | 0 | 41 | 23 | 0 | 18 |
| Oct-14 | 82 | | 32 | 0 | 23 | | 0 | 0 | 1 | 26 | | 1 | 12 |
| Nov-14 | 38 | | 12 | 0 | 9 | | 0 | 0 | 0 | | 10 | 0 | 7 |
| Dec-14 | 44 | | 16 | 0 | 19 | | 0 | 0 | 0 | | | 0 | 4 |
| Jan-15 | 58 | | 24 | 0 | 22 | | 0 | 0 | 0 | | | 1 | 6 |
| Feb-15 | 85 | | 37 | 0 | 35 | | 0 | 0 | 0 | 13 | | 0 | 7 |
| Mar-15 | 120 | | 51 | 0 | 20 | | 0 | 0 | 0 | | | 0 | 25 |
| Apr-15 | 111 | 70 | 47 | 0 | 23 | | 0 | 0 | 1 | 40 | 22 | 1 | 17 |
| May-15 | 84 | | 36 | 0 | 13 | | 0 | 0 | 1 | 34 | 23 | 1 | 10 |
| Jun-15 | 84 | | 27 | 1 | 21 | | 0 | 0 | 0 | 0 | | 0 | 17 |
| Jul-15 | 72 | | 14 | 0 | 18 | | 0 | 0 | 1 | 39 | | 0 | 10 |
| Aug-15 | 66 | | 16 | 0 | 23 | | 0 | 0 | 0 | 27 | 16 | 1 | 10 |
| Sep-15 | 73 | | 51 | 0 | 6 | v | 0 | 0 | 0 | | 8 | 0 | 8 |
| Total: | 2,358 | 1,065 | 636* | 2 | 427 | 4 | - | - | 4 | 683 | 372* | 11 | 300 |

^{*}This represents the number of disconnections on accounts that received LIHEAP/OEAP payments, not a count of payments.

Customer Count and Total Dollars 60-Days in Arrears

| 2013 | Customer Count* | Dollars | | |
|-----------|-----------------|-----------|--|--|
| | 61+ | 61+ | | |
| January | 1,442 | \$152,347 | | |
| February | 1,426 | \$190,856 | | |
| March | 1,339 | \$193,610 | | |
| April | 1,592 | \$271,509 | | |
| May | 1,870 | \$279,824 | | |
| June | 2,004 | \$269,440 | | |
| July | 1,875 | \$228,254 | | |
| August | 1,635 | \$175,567 | | |
| September | 1,605 | \$189,746 | | |
| October | 2,341 | \$244,410 | | |
| November | 2,668 | \$237,771 | | |
| December | 3,044 | \$242,737 | | |

| 2014 | Customer Count | Dollars | | |
|-----------|-----------------------|-----------|--|--|
| | 61+ | 61+ | | |
| January | 2,554 | \$218,320 | | |
| February | 2,509 | \$237,926 | | |
| March | 2,282 | \$261,655 | | |
| April | 2,231 | \$304,071 | | |
| May | 2,621 | \$384,886 | | |
| June | 2,560 | \$289,575 | | |
| July | 2,577 | \$246,897 | | |
| August | 2,384 | \$200,947 | | |
| September | 1,964 | \$142,802 | | |
| October | 1,787 | \$107,787 | | |
| November | 1,942 | \$131,056 | | |
| December | 1,988 | \$129,166 | | |

| 2015 | Customer Count | Dollars |
|-----------|-------------------|-----------|
| | 61+ | 61+ |
| January | 2,202 | \$157,115 |
| February | 1,914 | \$157,965 |
| March | 1,498 | \$100,814 |
| April | 1,513 | \$114,108 |
| May | 1,760 | \$143,209 |
| June | 1,736 | \$105,065 |
| July | 1,755 | \$88,816 |
| August | 1,649 | \$60,301 |
| September | 1,558 | \$42,697 |
| October | | |
| November | | |
| December | | |

^{*}The customer count is the number of utility service agreements.