



Oregon

Kate Brown, Governor

Public Utility Commission

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March 17, 2020



BY EMAIL

Idaho Power Company

Lisa Nordstrom, lnordstrom@idahopower.com

RE: Advice No. 20-03

At the special public meeting on March 17, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1100. The Staff Report, a receipted copy of the sheets in your advice filing, and a signed LSN are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

Analysis

The language in the Fourth Revised Sheet G-1, section 5, states in part: “Beginning August 31, 2013, a Late Payment Charge, as provided in Schedule 66, *will* be levied against any unpaid account that is not paid in full each month...” (emphasis added). The Company requests changing the language from “will be levied” to “may be levied” in order to provide discretion in applying the charge. This flexibility will allow Idaho Power to temporarily waive late charges for unpaid accounts during the declared COVID-19 emergency.

In its petition, Idaho Power states that it considers the tariff revision to be practical in the face of changing economic conditions for its Oregon customers, and believes the flexibility to waive charges is in the best interest of its customers.

The Company filed the request to be approved with less than statutory notice as required by ORS 757.220. The Company claims “good cause” due to the request being in response to the declared COVID-19 emergency. Staff agrees with the Company’s rationale for good cause.

Conclusion

Staff concludes that the Company's tariff modification request is warranted, is in the best interest of customers, and should be granted with less than statutory notice.

PROPOSED COMMISSION MOTION:

Approve Idaho Power’s request for a modification to tariff Sheet No. G-1 to allow for temporary suspension of late charges for unpaid accounts.

**RULE G
BILLINGS**

1. Fractional Periods. When the Customer's Billing Period is less than 27 days or greater than 36 days, the Energy Charge for service under Schedules 1, 5, 7, 9, 19, or 24 the Energy Charge will be calculated using actual meter readings. The Energy Charge for services provided under Schedule 40 will be determined using the daily kWh calculated on the basis of load size and number of units served multiplied by the actual number of days since the account was opened or since the previous billing, where appropriate. The proration of the applicable Demand Charge, Basic Charge, Facilities Charge, and Service Charge specified in the appropriate schedule will be calculated by dividing the charge by 30 and multiplying the result by the actual number of days since the account was opened or since the previous meter reading, where appropriate. However, the prorated Service Charge for Schedules 1, 5, 7, 9, 19, or 24 or the Minimum Charge for Schedule 40, will be no less than the amount specified in Schedule 66. For Schedule 15, the proration of the applicable Monthly Charge will be calculated by dividing the charge by 30 and multiplying the result by the actual number of days since the account was opened or the previous billing, where appropriate; however, in no event will the charge be less than the Fractional Period Minimum Billings amount specified in Schedule 66.

2. Corrected Billings. Whenever it is determined that a Customer was incorrectly billed, the Customer may be rebilled the correct amount as described in OAR 860-021-0135. The Company may not bill for services provided more than three years for over-billed amounts and no more than two years for under-billed amounts before the date the Company discovered the billing error. The corrected billings will not exceed a 12-month period from the date the last incorrect bill was issued.

For under-billed amounts, the Company shall provide written notice to the Customer detailing the circumstances, time period, and the adjustment amount of the underbilling. If an underbilling occurs, the Company will offer and enter into reasonable payment arrangements with the Customer. The Customer shall be notified in writing of the opportunity for time payments and of the Commission's dispute resolution process. For any overbillings, the Customer will have the choice of a refund or a credit on future bills.

3. Due Dates. The Company's practices relating to Due Dates are governed by the Oregon Administrative Rules (OAR) of the Oregon Public Utility Commission, in effect at the time the event occurred which required application of the OAR. If the Company's Rules and Regulations on file with the Oregon Public Utility Commission contain provisions which conflict with the OAR, the provisions of the OAR supersede those included in the Company's Rules and Regulations.

4. Returned Checks. Checks or payments remitted by Customers in payment of bills are accepted conditionally. A Returned Check Charge, as specified in Schedule 66, will be assessed the Customer for handling each check or payment upon which payment has been refused by the bank.

5. Late Payments. Beginning August 31, 2013, a Late Payment Charge, as provided in Schedule 66, may be levied against any unpaid account that is not paid in full each month, except for accounts of agencies of the State of Oregon as described below. All payments received by the subsequent month's billing date will apply to the Customer's account prior to calculating the Late Payment Charge. Payments will satisfy the oldest portion of the billing first and the current portion of the billing last. A Late Payment Charge will not be applied to a Residential account with a Time Payment Agreement or a Budget Pay Plan that is current.

(C)

Late Payment Charges to agencies of the State of Oregon will follow provisions of Oregon Code §293.462. Any state agency that claims that it falls within the provisions of Oregon Code §293.462 must notify Idaho Power Company in writing of such claim.

Received by OPUC
Filing Center

Issued by IDAHO POWER COMPANY
By Timothy E. Tatum, Vice President, Regulatory Affairs
1221 West Idaho Street, Boise, Idaho

03/16/2020

OREGON

Issued: March 16, 2020
Effective with Service
Rendered on and after:
March 16, 2020

LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at puc.filingcenter@state.or.us.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF <u>Idaho Power Company</u> (UTILITY COMPANY) TO WAIVE STATUTORY NOTICE.)))))	UTILITY L.S.N. APPLICATION NO. <u>2254</u> (LEAVE BLANK)
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NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.

1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)
 Change the word "will" to "may" in regard to the levying of late payment charges in Rule G - Billings.

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)
 Fourth Revised Sheet No. G-1

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)
 Fifth Revised Sheet No. G-1

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:
 Idaho Power Company is submitting this L.S.N, for Advice No. 20-03 because the tariff sheet G-1 to the advice filing is being provided less than 30 days between the date of the filing and the requested effective date. In response to COVID-19, Idaho Power seeks the ability to suspend the billing of Late Payment Charges. The Company seeks to waive the statutory notice to implement this change as soon as possible.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S):

AUTHORIZED SIGNATURE 	TITLE LEAD COUNSEL	DATE 3/16/2020
PUC USE ONLY		
<input checked="" type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE 03/16/2020	
AUTHORIZED SIGNATURE 	DATE 03/17/2020	