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July 17, 2020

**VIA ELECTRONIC FILING**

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

RE: Tariff Advice No. 20-08  
Request to Modify Schedule 15, Dusk To Dawn Customer Lighting, and Schedule 41,  
Street Lighting Service, to Allow For Light-Emitting Diode Technology

Attention Filing Center:

Idaho Power Company ("Idaho Power" or "Company") herewith submits the enclosed tariff revisions to Schedule 15, Dusk To Dawn Customer Lighting ("Schedule 15"), and Schedule 41, Street Lighting Service ("Schedule 41") for filing:

Eighteenth Revised Sheet No. 15-2	Canceling	Seventeenth Revised Sheet No. 15-2
Second Revised Sheet No. 41-1	Canceling	First Revised Sheet No. 41-1
Twentieth Revised Sheet No. 41-2	Canceling	Nineteenth Revised Sheet No. 41-2
Twentieth Revised Sheet No. 41-3	Canceling	Nineteenth Revised Sheet No. 41-3
Eighteenth Revised Sheet No. 41-4	Canceling	Seventeenth Revised Sheet No. 41-4
Original Sheet No. 41-5		

Idaho Power is requesting approval to (1) modify Schedule 15 and Schedule 41 to allow for light-emitting diode ("LED") technology, eliminate the option for new installations of Company-owned High Intensity Discharge ("HID") street lights and area lights going forward effective October 7, 2020, and (2) close Option "B" of Schedule 41, customer-owned, Idaho Power-maintained systems as of September 30, 2023. No rate changes are proposed as part of this filing.

**Background**

Idaho Power's lighting services are provided through two tariff schedules: Schedule 15 and Schedule 41. Schedule 15 is applicable to electric service provided for the outdoor dusk to dawn lighting of commercial, industrial, and residential customer grounds, yards, driveways, and premises. Customers taking service under Schedule 15 are charged on a per lamp basis for the type and wattage of lamp. All light fixtures under Schedule 15 are owned and maintained by the Company.

Schedule 41 is applicable to electric service provided for lighting of public streets, public alleys, public grounds, and thoroughfares to improve visibility for drivers, as well as to illuminate outdoor pedestrian walkways. Schedule 41 currently provides three service options for street lighting customers.

- Option “A” (“Schedule 41A”) provides for Idaho Power-owned and Idaho Power-maintained street lighting systems. Street lighting systems under this option are not metered and customers pay monthly lamp charges based on their choice of standard wattage high pressure sodium vapor lamps.
- Option “B” (“Schedule 41B”) provides for customer-owned, Idaho Power-maintained street lighting systems. Option “B” was closed to new service in 2012 as a part of Idaho Power’s last general rate case. All new customer-owned lighting systems installed after January 1, 2012, have been required to take service under Option C, where the lighting system is owned, operated, and maintained by the customer.
- Option “C” (“Schedule 41C”) provides a service option for customers choosing to own their lighting system. Option “C” allows customers with lighting systems to provide their own maintenance without being charged for Idaho Power-provided maintenance. Option “C” also provides greater flexibility to customers as they are not limited to the light fixture offered by Idaho Power; rather, the customer can install new and unique lighting systems not offered by the Company.

As of June 1, 2020, there were 549 customers in Oregon taking service under Schedule 15, 10 customers taking service under Schedule 41A, 2 customers taking service under Schedule 41B, and 1 customer taking service under Schedule 41C. Schedule 41 customers are primarily cities.

All Company-owned lighting systems installed under Schedules 15 and 41 in Idaho Power’s Oregon service area currently consist of either high pressure sodium or metal halide light fixtures, collectively referred to as HID light fixtures. Idaho Power currently performs maintenance on approximately 12 fixtures owned by 2 customers in Oregon under Option “B” of Schedule 41.

### **Conversion to Led Fixtures**

Due to a changing technology within the lighting industry, the Company has less certainty regarding the future availability of HID lighting. Idaho Power’s current fixture manufacturer has notified Idaho Power that it has discontinued all but two of the high pressure sodium fixtures and has eliminated metal halide options on many other fixtures. Based on conversations with this and other manufacturers, the industry trend is to manufacture more LED light fixtures, and fewer HID light fixtures. The Company expects HID streetlight and area light options to become increasingly obsolete as LED replacements become more widely utilized.

LED light provides significant advantages over traditional HID lighting options. LED lights use less energy, reduce maintenance costs, can be recycled, reduce light pollution, and provide better lighting quality as compared to HID technology. If all Company-owned lighting systems in Schedule 15 and Schedule 41A are replaced with the proposed LED light fixtures, Idaho Power estimates an annual reduction in energy consumption of approximately 8,581 megawatt-hours system wide; with roughly 600 megawatt-hours of the energy saving coming from Idaho Power’s Oregon service area.

With the Commission's approval, the Company will begin replacing the Company-owned HID lighting systems after October 7, 2020. The Company anticipates replacing all the existing fixtures before September 30, 2023. Idaho Power will utilize current staffing to replace 775 light fixtures under Schedule 15 and 1,106 light fixtures under Schedule 41A. The color temperature of the LED street lights and area lights selected for installation are dark sky compliant with a color temperature of 3,000K; the LED flood lights, however, have a color temperature of 4,000K. The existing fixtures to be removed from service will be retired using the Company's normal retirement process.

The Company filed Case No. IPC-E-19-17 with the Idaho Public Utilities Commission ("Idaho Commission") seeking approval of an LED conversion in its Idaho service area. On September 30, 2019, the Idaho Commission issued Order No. 34452 approving Idaho Power's request to (1) replace all Company-owned HID lighting systems in its Idaho jurisdiction starting after October 1, 2019, and (2) discontinue service under Option B of its Idaho tariff as of September 30, 2023.

### **Proposed Changes to Tariff Offerings – Not Rates**

The Company requests to (1) replace all Company-owned HID lighting systems under Option "A" of Schedule 41 and Schedule 15 with equivalent LED light fixtures with no option for new installations of HID lighting systems going forward and (2) discontinue service under Option "B" as of September 30, 2023.

Idaho Power is requesting to discontinue maintenance of customer-owned HID street light fixtures by closing Option "B" of Schedule 41 and transition customer-owned HID street light fixtures to either Option "C" or Option "A" of Schedule 41. There are two cities taking service under Option "B" of Schedule 41; both cities also take service under either Option "A" or Option "C" of Schedule 41. Transitioning customer-owned street light fixtures to either Option "A" or Option "C" at a date of each city's choosing will properly situate the Company for the impending obsolescence of HID lighting.

Idaho Power is not requesting to change rates for Option "A" of Schedule 41 or for Schedule 15, and the Company's request does not impact rates for Option "C" of Schedule 41. The Company's request in this case is to modify its tariff to allow for LED technology to be deployed in light of the obsolescence of HID technology. The Company expects it will seek for inclusion any new rate base required to provide service to Schedules 15 and 41 in a future rate proceeding.

For tariff Schedule 41, Idaho Power proposes to: (1) add language to Option "A" to indicate that high pressure sodium vapor lighting systems will no longer be available for new installations as of October 7, 2020, (2) add language providing an option for customers to request a shield be installed, at their expense, on an LED fixture, (3) outline the proposed wattage and lumen ranges identified as the LED replacements for existing high pressure sodium vapor lighting systems under Option "A", (4) add language to indicate the closure of Option "B" effective September 30, 2023, and (5) for housekeeping purposes, add language where necessary to specify whether the tariff provision applies to high pressure sodium vapor or LED fixtures.

For Schedule 15, Idaho Power proposes changes that will (1) add language to indicate that high pressure sodium vapor lighting systems and metal halide lighting systems will no longer be available for new installations as of October 7, 2020, and (2) outline the proposed wattage and lumen ranges identified as the LED replacements for existing high pressure sodium vapor lighting systems.

Please see the attached tariff sheets showing the Company's proposed changes for Schedules 15 and 41

### **Customer Communication**

The Company has identified ten customers taking service under Option "A" or "B" of Schedule 41. The Company contacted each customer prior to making this filing, to inform them of the filing and gather feedback. If approved, Idaho Power will personally contact all customers taking service under Option "A" or "B" of Schedule 41 to inform them of the Commission's decision and discuss the Company's implementation plan.

For Schedule 15 customers, the Company will send a postcard to Schedule 15 customers upon approval by the Commission. The post card will let the customer know that the Company will be replacing area lights with LED fixtures. A draft of the postcard is included as Attachment 1. Additionally, at the time the Company performs the LED replacement for Schedule 15 customers, Idaho Power will leave a doorhanger explaining that the light was replaced with an LED. A draft of the doorhanger is included as Attachment 2.

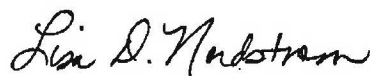
### **Conclusion**

The reduced cost of LED lighting has created parity in lighting options that allow Idaho Power to move to LED street and area lighting. Converting Company-owned lighting systems in its Oregon service area to LED fixtures will allow Idaho Power to better satisfy its customers' preferences, as well as promote energy efficiency and environmental stewardship. Further, approval of the Company's planned LED conversion and proposed tariff changes in its Oregon service area will allow the Company to offer a consistent offering across both jurisdictions it operates in. As more fully described above, Idaho Power requests that the Commission issue an order authorizing the Company to modify Schedules 15 and 41 to allow for LED technology, to eliminate the option for new installations of Company-owned HID street lights and area lights going forward effective October 7, 2020, and to close Option "B" of Schedule 41 to service effective September 30, 2023.

Idaho Power respectfully requests that the tariff changes become effective on October 7, 2020; however, the Company would not oppose a later effective date if the Commission or Commission Staff does not believe the Company's proposed timeline is sufficient to process the issues presented by the Company in this matter.

If you have any questions regarding this filing, please contact Regulatory Analyst Kristy Patteson at (208) 388-2982 or [kpatteson@idahopower.com](mailto:kpatteson@idahopower.com).

Sincerely,



Lisa D. Nordstrom  
Lead Counsel

LDN/sdh  
Enclosures

SCHEDULE 15  
DUSK TO DAWN CUSTOMER LIGHTING  
 (Continued)

MONTHLY CHARGE

Effective October 7, 2020, High Pressure Sodium Vapor lighting systems are not available for new installation. (N)

The Monthly Charge is the per Unit Charge and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), and Schedule 95 (Adjustment for Municipal Exactions).

1. Monthly Per Unit Charge on existing facilities:

AREA LIGHTING

<u>High Pressure Sodium Vapor</u>		<u>LED Equivalent</u>		<u>Monthly Base Rate</u>
<u>Watts</u>	<u>Average Lumens</u>	<u>Watt (Maximum)</u>	<u>Lumen (Minimum)</u>	
100	8,550	40	3,600	\$ 10.83
200	19,800	85	7,200	\$ 12.87
400	45,000	200	18,000	\$ 17.42

FLOOD LIGHTING

<u>High Pressure Sodium Vapor</u>		<u>LED Equivalent</u>		<u>Monthly Base Rate</u>
<u>Watts</u>	<u>Average Lumens</u>	<u>Watt (Maximum)</u>	<u>Lumen (Minimum)</u>	
200	19,800	85	8,100	\$ 15.46
400	45,000	150	18,000	\$ 18.22

<u>Metal Halide</u>		<u>LED Equivalent</u>		<u>Monthly Base Rate</u>
<u>Watts</u>	<u>Average Lumens</u>	<u>Watt (Maximum)</u>	<u>Lumen (Minimum)</u>	
400	28,800	150	18,000	\$ 13.45
1,000	88,000	300	32,000	\$ 21.28

2. For New Facilities Installed Before August 8, 2005. The Monthly Charge for New Facilities installed, prior to August 8, 2005 such as overhead secondary conductor, poles, anchors, etc., shall be 1.51 percent of the estimated installed cost thereof.

3. For New Facilities Installed On or After August 8, 2005. The non-refundable charge for New Facilities to be installed, such as underground service, overhead secondary conductor, poles, anchors, etc., shall be equal to the work order cost.

PAYMENT

The monthly bill for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

SCHEDULE 41  
STREET LIGHTING SERVICE

AVAILABILITY

Service under this schedule is available throughout the Company's service area within the State of Oregon where street lighting wires and fixtures can be installed on Customer-provided street lighting facilities or installed on the Company's existing distribution facilities.

APPLICABILITY

Service under this schedule is applicable to service requested or installed by Customers for the lighting of public streets, public alleys, public grounds, and thoroughfares. Street lighting lamps will be energized each night from dusk until dawn.

SERVICE LOCATION AND PERIOD

Street lighting facility locations, type of unit and lamp sizes, as changed from time to time by written request of the Customer and agreed to by the Company, shall be provided for Customers receiving service under Options A and B of this schedule. The in-service date for each street lighting facility shall also be maintained.

The minimum service period for any Company-owned street lighting facility is 10 years. The Company, upon written notification from the Customer, will remove a Company-owned street lighting facility:

1. At no cost to the Customer, if such facility has been in service for no less than the minimum service period. The Company will not grant a request from the Customer for reinstallation of street lighting service at the same location for a minimum period of two years from the date of removal.
2. Upon payment to the Company of the removal cost, if such facility has been in service for less than the minimum service period.

SERVICE OPTIONS

"A" - Idaho Power-Owned, Idaho Power-Maintained System – Effective October 7, 2020, high pressure sodium vapor lighting systems are not available for new installation. (C)

The facilities required for supplying service, including fixture, lamp, control relay, mast arm for mounting on an existing utility pole, and energy for the operation thereof, are supplied, installed, owned and maintained by the Company. All necessary repairs and maintenance work, including group lamp replacement and glassware cleaning, will be performed by the Company during the regularly scheduled working hours of the Company on the Company's schedule. Individual lamps will be replaced on burnout as soon as reasonably possible after notification by the Customer and subject to the Company's operating schedules and requirements.

The Company has two standard high pressure sodium vapor street lighting fixture options, drop-glass or cut-off (shielded lighting). For each initial high pressure sodium vapor lighting fixture installation, the Customer is required to state, in writing, a fixture preference. A maintenance-related replacement of a current high pressure sodium vapor fixture will be made with a similar type of drop-glass or cut-off fixture as the one being replaced unless written notification has been received from the Customer requesting a change in fixture types. (C)

SCHEDULE 41  
STREET LIGHTING SERVICE  
 (Continued)

SERVICE OPTIONS (Continued)

"A" - Idaho Power-Owned, Idaho Power-Maintained System (Continued)

Accelerated Replacement of Existing Fixtures

In the event a Customer requests the Company perform an accelerated replacement of existing fixtures with the cut-off fixture, the following charges will apply:

1. The designed cost estimate which includes labor, time, and mileage costs for the removal of the existing street lighting fixtures.
2. \$132.00 per fixture removed from service.

The total charges identified in 1 and 2 above must be paid prior to the beginning of the fixture replacement and are non-refundable. The accelerated replacement will be performed by the Company during the regularly scheduled working hours of the Company and on the Company's schedule.

LED Shield

In the event a Customer requests the Company install a shield on an LED fixture, the Customer will be responsible for the material cost of the equipment, as well as the design cost estimate which includes labor, time, and mileage costs for the alteration of the existing LED fixture.

(N)  
 |  
 (N)

Monthly Charges

The Monthly Charges are as follows, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), and Schedule 95 (Adjustment for Municipal Exactions).

Lamp Charges, per lamp (41A)

<u>High Pressure Sodium Vapor</u>		<u>LED Equivalent</u>		<u>Monthly</u>
<u>Watts</u>	<u>Average Lumens</u>	<u>Watt (Maximum)</u>	<u>Lumen (Minimum)</u>	<u>Base Rate</u>
70	5,540	40	3,600	\$8.90
100	8,550	40	3,600	\$9.26
200	19,800	85	7,200	\$12.21
250	24,750	140	10,800	\$13.27
400	45,000	200	18,000	\$15.06

(C)  
 |  
 (C)

Pole Charges

For Company-owned poles required to be used for street lighting only:

- Wood pole \$ 1.90 per pole
- Steel pole \$ 7.39 per pole

SCHEDULE 41  
STREET LIGHTING SERVICE  
(Continued)

SERVICE OPTIONS(Continued)

"A" - Idaho Power-Owned, Idaho Power-Maintained System (Continued)

Monthly Charges (Continued)

Facilities Charge

Customers assessed a monthly facilities charge prior to August 8, 2005 for the installation of underground circuits will continue to be assessed a monthly facilities charge equal to 1.21 percent of the estimated cost difference between overhead and underground circuits.

(M)  
|  
(M)

Payment

The monthly bill rendered for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

"B" - Customer-Owned, Idaho Power-Maintained System – No New Service and Effective September 30, 2023, Option B is closed to service.

(C)  
(C)

The Customer's lighting system, including posts or standards, fixtures, initial installation of lamps and underground cables with suitable terminals for connection to the Company's distribution system, is installed and owned by the Customer and maintained by Idaho Power. Customer-owned lighting systems receiving maintenance under Option B must have Idaho Power standard wattage high pressure sodium vapor lamps installed in all street lighting fixtures.

Customer-owned systems constructed, operated, or modified in such a way as to allow for the potential or actual variation in energy usage, such as through, but not limited to, the use of wired outlets or useable plug-ins, are required to be metered in order to record actual energy usage.

Energy and Maintenance Service

Energy and Maintenance Service includes operation of the system, energy, lamp renewals, cleaning of glassware, and replacement of defective photocells which are standard to the Company-owned street light units. Service does not include the labor or material cost of replacing cables, standards, broken glassware or fixtures, painting, or refinishing of metal poles. Individual lamps will be replaced on burnout as soon as reasonably possible after notification by the Customer and subject to the Company's operating schedules and requirements.



SCHEDULE 41  
STREET LIGHTING SERVICE  
 (Continued)

"B" - Customer-Owned, Idaho Power-Maintained System (Continued)

(M)

Monthly Charges

The Monthly Charges are as follows, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), and Schedule 95 (Adjustment for Municipal Exactions).

Non-Metered Service, per lamp (41B)

<u>Standard High Pressure Sodium Vapor Energy and Maintenance Charges</u>	<u>Average Lumens</u>	<u>Monthly Base Rate</u>
70 Watt	5,540	\$ 2.77
100 Watt	8,550	\$ 3.25
200 Watt	19,800	\$ 4.48
250 Watt	24,750	\$ 5.41
400 Watt	45,000	\$ 7.45

(M)

Payment

The monthly bill rendered for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

"C" - Customer-Owned, Customer-Maintained System

The Customer's lighting system, including posts or standards, fixtures, initial installation of lamps and underground cables with suitable terminals for connection to the Company's distribution system, is installed, owned, and maintained by the Customer. The Customer is responsible for notifying the Company of any changes or additions to the lighting equipment or loads being served under Option C – Non-Metered Service. Failure to notify the Company of such changes or additions will result in the termination of non-metered service under Option C and the requirement that service be provided under Option C - Metered Service.

All new Customer-owned lighting systems installed outside of Subdivisions on or after January 1, 2012 are required to be metered in order to record actual energy usage.

Customer-owned systems installed prior to June 1, 2004 that are constructed, operated, or modified in such a way as to allow for the potential or actual variation in energy usage may have the estimated annual variations in energy usage charged the Non-Metered Service - Energy Charge until the street lighting system is converted to Metered Service, or until the potential for variations in energy usage has been eliminated, whichever is sooner.

SCHEDULE 41  
STREET LIGHTING SERVICE  
(Continued)

"C" - Customer-Owned, Customer-Maintained System (Continued)

(M)

Monthly Charges

The monthly charges are as follows, and may also include charges as set forth in Schedule 55 (Power Cost Adjustment), Schedule 91 (Energy Efficiency Rider), and Schedule 95 (Adjustment for Municipal Franchise Fees). For non-metered service, the average monthly kWh of energy usage shall be estimated by the Company based on the total wattage of the Customer's lighting system and 4,059 hours of operation.

Non-Metered Service (41C)

Energy Charge, per kWh 4.993¢

Metered Service (41CM)

Service Charge, per meter \$2.88

Energy Charge, per kWh 4.993¢

(M)

**IDAHO POWER COMPANY**

**Tariff Advice 20-08**

**ATTACHMENT 1**



An IDACORP Company

P.O. Box 70 (83707)

1221 W. Idaho St.

Boise, ID 83702

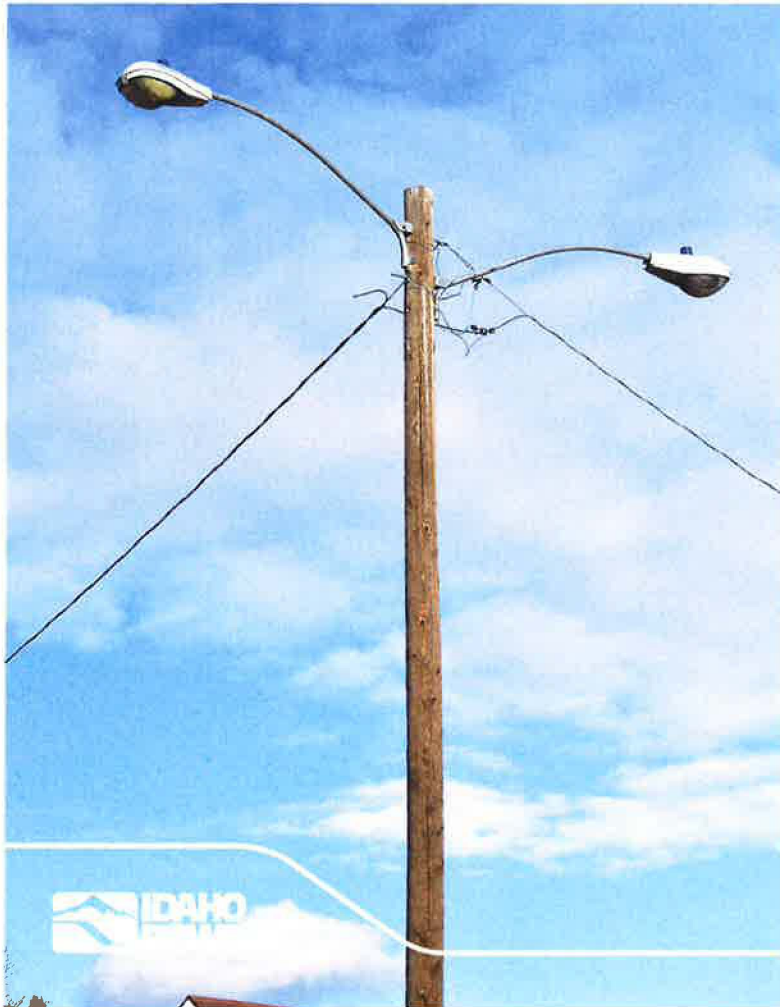
PRE-SORTED  
STANDARD  
U.S. POSTAGE

**PAID**

BOISE, ID  
PERMIT NO. 679

# Your New LED Light is Coming!





# Your New LED Light is Coming!

Idaho Power has begun replacing area lights with LED (light-emitting diode) fixtures.

This new light will provide better lighting quality and require less maintenance.

If you have questions, please contact one of our energy advisors at **1-800-632-6605**.



**IDAHO POWER COMPANY**

**Tariff Advice 20-08**

**ATTACHMENT 2**



# New LED Lights Have Arrived!

**Idaho Power has replaced the area light at this address with an LED (light-emitting diode) fixture.**

This new light will provide better lighting quality and require less maintenance.

If you have questions, please contact one of our energy advisors at **1-800-632-6605** or visit our website for more information.