

LISA D. NORDSTROM Lead Counsel Inordstrom@idahopower.com

October 13, 2017

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

Re: Tariff Advice No. 17-08

Update to Rule F, Service Connection and Discontinuance to implement a Winter

Protection Program

Attention Filing Center:

Idaho Power Company ("Idaho Power" or "Company") hereby submits proposed changes to Rule F, Service Connection and Discontinuance, to implement a Winter Protection Program ("WPP" or "Program") in its Oregon service area. Idaho Power requests the Public Utility Commission of Oregon ("Commission") approve the Company's proposed WPP as it pertains to OAR 860-021-0407.

The following tariff sheets identify the proposed cost updates and language modifications:

Second Revised Sheet No. F-1 Cancelling First Revised Sheet No. F-1 Original Sheet F-2 New

On May 30, 2017, the Commission issued Order No. 17-197 in Docket No. AR 601, authorizing the implementation of OAR 860-021-0407. The new rule establishes a moratorium during severe weather when certain temperature thresholds are met. The rule also includes a provision that allows for the exemption of the temperature threshold if an energy utility offers a Commission-approved winter protection program.

OAR 860-021-0407 Severe Weather Moratorium on Involuntary Disconnection of Residential Electric or Gas Utility Service

Sections 1 and 8 of the Commission approved rule are set forth below:

- (1) Except as set forth in section (8) of this rule, an energy utility must put into effect a moratorium on the disconnection of residential service for nonpayment on any day a high temperature of less than 32 degrees Fahrenheit is forecast by the applicable weather reporting service.
- (8) The temperature threshold specified in section (1) of this rule does not apply if an energy utility offers a Commission-approved winter protection program.

Idaho Power submitted comments in Docket No. AR 601 on April 14, 2017, supporting the rule, so long as Section 8 was included. In its comments, the Company explained that cities within its service territory with higher elevation, such as those on the eastern side of the state, experience prolonged severe weather conditions. For example, the average temperature in Vale, Oregon,

Public Utility Commission of Oregon October 13, 2017 Page 2

during winter is 30.3 degrees. Thus, a severe weather moratorium with a temperature threshold of 32 degrees could result in a mandatory moratorium for all Idaho Power residential customers during all winter months. This could result in large outstanding balances owed on accounts after the moratorium period.

Idaho Power has approximately 13,420 residential customers in Oregon and believes the rule strikes an appropriate balance between the health and safety of customers and utility operations for service disconnections and customer account balance collections. Due to its unique service territory, the Company believes its proposed WPP is the best method for protecting residential customers.

Proposed Winter Protection Program

Pursuant to Section 8 of the rule, Idaho Power is seeking Commission approval to implement the following WPP in its Oregon service area:

Moratorium Period: The WPP will be effective from December 1 through the last day of February.

<u>Eligibility</u>: Residential customers that declare they are unable to pay their bill and whose household includes children, elderly, or infirm residents are eligible for the WPP. Children refers to persons 18 years of age or younger. Customers who are emancipated minors are not considered children. Elderly refers to persons 62 years of age or older. Infirm refers to persons whose physical health or safety would be seriously impaired by Termination of Service. Customers with a medical certificate are eligible for the WPP.

Monthly Payment Requirements: Customers who qualify for the WPP are not required to make a payment during the Moratorium Period; however, partial payments will be accepted to minimize cumulative past due balances when the WPP moratorium period ends. Idaho Power would not require a minimum payment because the intent of the WPP is to protect at-risk customers and disconnecting utility service due to the failure to abide by the terms of a required payment plan during the winter could be detrimental to the health and safety of the customer.

<u>Late Payment Charges</u>: In accordance with OAR 860-021-0126, the Company will assess a late payment charge during the WPP moratorium period. The Company's late payment charge is 12 percent per annum, or one percent per month.

<u>Verification</u>: Idaho Power would rely on information provided by the customer to determine eligibility.

<u>Arrearage Management</u>: Customers with existing time payment arrangements ("TPA") at the beginning of the moratorium period will be required to pay any unpaid installment amounts after the WPP period; any past due balance accrued during the moratorium period will be eligible for a new TPA. All customers will be eligible to establish a TPA for any past due balance accrued during the moratorium period.

Idaho Power offers the following TPAs:

• *Promise to Pay* – the customer commits to pay the full balance by a certain date within the next 10 days.

Public Utility Commission of Oregon October 13, 2017 Page 3

- Standard Time Pay the customer pays half the outstanding balance within 10 days, and the remaining half balance within 30 days.
- Levelized Pay the customer pays the past due balance in 12 equal installments.
- Equal Pay the customer pays a down payment equal to one-twelfth the amount owed for past electric or gas service (including the overdue amount and any amounts owed for a current bill or a bill being prepared but not yet delivered to the customer) each month, for the next 11 months. An amount equal to the down payment will be added to, and payable with, the current charges due for utility service.

Customer Communication

To ensure residential customers are aware of the WPP, the Company will include a section about the Program in the summary of the rights and responsibilities brochure that is sent annually to all residential customers. Additionally, an insert will also be included with initial disconnection notifications and final disconnection notices that are sent during the moratorium period with information regarding the Program. The Company has included the revised rights and responsibilities brochure and the proposed bill insert with this filing. In addition to the bill insert and brochure, Idaho Power will also inform customers with a past due account that contact the Company of the WPP to determine if they are eligible.

Severe Weather Moratorium

If the Company's WPP is approved, the temperature threshold in Section 1 of OAR 860-021-0407 would not apply; however, the Company proposes that customers who may not qualify for the WPP receive protection from disconnection during prolonged severe weather. As described in the proposed Rule F, Idaho Power will not disconnect residential service for nonpayment when, per the Boise office of the National Weather Service, the forecasted daytime highs do not exceed 25 degrees Fahrenheit for three consecutive week days or if the forecasted nighttime low falls below 10 degrees Fahrenheit on any weekday. Per OAR 860-021-0320, disconnections do not occur on weekends or holidays. The proposed WPP, if approved, would align the Program in Oregon with the existing Program in Idaho, ensuring consistency of practices and mitigating administrative burdens for both service territories.

Idaho Power respectfully requests that the proposed revisions to Rule F and the WPP are approved prior to the WPP effective date of December 1, 2017, in order for the Program to be in place when the moratorium period begins.

If you have any questions regarding this tariff advice, please contact Regulatory Analyst Zach Harris at 388-2305 or zharris@idahopower.com.

Sincerely,

Lisa D. Nordstrom

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LDN:kkt Enclosures

RULE F SERVICE CONNECTION AND DISCONTINUANCE

- Service Connection. Where service at the specified Point of Delivery is currently disconnected from the Company's system, a Service Connection Charge or Remote Service Connection Charge as specified in Schedule 66 will be assessed at the time service is connected. The applicable charge will be billed with the first regular bill. The Service Connection Charge applies to all service connections, except for remote service connections, for both metered and unmetered service. The Remote Service Connection Charge applies only to those service connections where remote capability of reconnection is available and when service is connected remotely.
- 2. <u>Service Discontinuance</u>. At the Customer's request, the Company will disconnect service during normal working hours. There is no charge for discontinuing service.
 - When a Customer requests service be discontinued, service will not be disconnected if another party has agreed to accept responsibility for service at the Point of Delivery.
- 3. <u>Termination Practices</u>. The Company's practices relating to Termination of Service 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. Termination of Service will not occur if a Residential customer qualifies for the Winter Protection Program.

a. Winter Protection Program. The Winter Protection Program protects eligible residential customers from Termination of Service during the Moratorium Period due to non-payment.

Moratorium Period: December 1 through the last day of February.

Eligibility: Residential customers that declare they are unable to pay their bill and whose household includes children, elderly, or infirm residents are eligible for the Winter Protection Plan. Children refers to persons eighteen years of age or younger. Customers who are emancipated minors are not considered children. Elderly refers to persons sixty-two years of age or older. Infirm refers to persons whose physical health or safety would be seriously impaired by Termination of Service. Customers with a medical certificate are eligible for the Winter Protection Plan.

Monthly Payment Requirements: Customers who qualify for the Winter Protection Plan are not required to make a payment during the Moratorium Period, however partial payments will be accepted.

- b. Termination of Service will not occur when the forecasted daytime highs do not exceed 25 degrees Fahrenheit for three consecutive weekdays or when the forecasted nighttime low falls below 10 degrees Fahrenheit on any weekday.
- 4. <u>Field Visit</u>. A Field Visit Charge, as specified in Schedule 66 will be assessed when a Company representative visits a service address intending to disconnect or connect service, but due to Customer action, the Company representative is unable to complete the disconnection or connection at the time of the visit. Examples of Customer action include a) the Customer making a payment at the door, or b) obstructing the Company's access to the Customer's meter or threatening to cause or causing physical harm to the Company representative.

(N)

(N)

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

OREGON Issued: October 13, 2017 Effective with Service Rendered on and after: December 1, 2017 P.U.C. ORE. NO. E-27

ORIGINAL SHEET NO. F-2

RULE F SERVICE CONNECTION AND DISCONTINUANCE (continued)

5. <u>Unauthorized Reconnection</u>. Where damage to the Company's facilities has occurred due to tampering or where reconnection of service has been made by other than the Company, an Unauthorized Reconnection Charge may be collected as specified in Schedule 66. This charge is not a waiver by the Company of the rights to recover losses due to tampering. In addition to the above-mentioned charge, the Customer receiving service shall be liable for any damage to Company property.

December 1, 2017



We appreciate the opportunity to serve you and are committed to providing you reliable electricity at a fair price.

Si desea una copía en español de este resumen de los derechos y responsabilidades del consumidor, por favor llame a Idaho Power al 1-800-488-6151. Su llamada será gratuita.

Копию брошюры на русском языке о правах и обязанностях потребителей можно заказать, позвонив в Idaho Power по телефону 1-800-488-6151.

Một bản tóm lược về quyền lợi của người tiêu thụ & trách nhiệm được in bằng ngôn ngữ này có sắn, nếu cần xin gọi Idaho Power qua số điện thoại miễn phí 1-800-488-6151.

សេចក្តីសង្គេបពីសិទ្ធិនិងការទទួលខុសត្រូវរបស់អ្នកប្រើប្រាស់ដែលបោះ ពុម្ពុជាភាសាខ្មែរ អាចរកបានដោយទូរស័ព្ទទៅ Idaho Power តាមលេខមិនអស់លយ 1-800-488-6151 ។

มิขมาสิท่าวทับสึด2อาลทด้าและทานรับผึด2อบผมในพาสา ลาวใช้ท่ามโทตาโรากาม Idaho Power โทย่์ได้ จ่าย 1-800-488-6151.

Idaho Power Company Customer Service Center 208-388-2323 within the Treasure Valley or Toll-free: 1-800-488-6151 idahopower.com

Public Utility Commission of Oregon Consumer Services Division 1-800-522-2404 or 503-378-6600













- DISCONNECTION NOTICES
- THIRD PARTY NOTICES
- DEPOSITS
- FINANCIAL ASSISTANCE
- MEDICAL CERTIFICATES
- PAYMENT PLANS
- LATE CHARGES
- RESOLVING DISPUTES
- CONSUMER ORGANIZATIONS

If you are applying for service or have service with a utility company in Oregon, you have certain rights and obligations. Following is a summary of those rights and obligations we have prepared in cooperation with the Consumer Services Division of the Oregon Public Utility Commission (Commission). This information applies only to electricity services regulated by the Commission.

Idaho Power's main obligation is to provide you with reliable service at rates approved by the Commission. Your main obligations are to pay for the services you use, to provide us with access to the meter, to not damage or tamper with our equipment, and to notify us if you move, wish to change your service or have a problem.

Disconnection Notices

Before Idaho Power can disconnect your service for non-payment, we must notify you. We are required to give you a 15-day notice, another notice five days before disconnection, and we will try to contact you the day the disconnection is scheduled.

Winter Protection Program

Service will not be turned off during the months of December through February to any residential customer who declares that he or she is unable to pay in full and whose household includes children, elderly or infirm persons. Any customer who enrolls in the Winter Protection Program must pay the balance due or negotiate a time payment arrangement on or after March 1 to avoid service termination.

Third Party Notices

You have the option to ask that another person receive your bills and notices if, for some reason, you are unable to receive or understand those bills and notices. Also, you may ask us to furnish you with notices in another language if you do not understand English.

Deposits

If circumstances warrant, we may ask you to pay a deposit. If a deposit is required, you have the right to pay it in several installments. Our Customer Service Center can work with you to make deposit arrangements.

Financial Assitance

Depending on your circumstances, several organizations can provide financial help to pay utility bills. If you would like more information or a list of organizations that provide financial assistance, please visit our website at **idahopower.com** or call our Customer Service Center toll free at 1-800-488-6151.

Medical Certificates

If you or a member of your household has a serious health problem and you are having trouble paying your utility bills, you may obtain a medical certificate from your doctor or other qualified medical professional who provides your health care. A medical certificate will prevent immediate disconnection of

your service and allow you to set up a payment plan to pay any overdue bill.

Payment Plans

You may take advantage of one of several special payment options designed to make it easier to pay your electric bills. You may pay your bills on a levelized-payment plan which will spread your payments out evenly over a one-year period. If you are unable to pay your electric bills for a period of time and we notify you that we intend to disconnect your service, you also may enter into a special agreement to pay the overdue amount over a set period of time.

Late Charges

Customers are responsible for paying their utility bills on time. Under certain circumstances, Idaho Power may add late payment charges to bills not paid on time.

Resolving Disputes

If you have a dispute with Idaho Power that is not resolved by contacting us, the Commission's Consumer Services Division is available to help you. You may contact the Commission by calling toll-free 1-800-522-2404.

Consumer Organizations

We have lists of consumer organizations that provide assistance in the communities we serve. If you would like a list of these organizations, please visit our website at www.idahopower.com or call our Customer Service Center toll free at 1-800-488-6151. The Commission's Consumer Services Division maintains a list of consumer organizations that participate in Commission proceedings and how to contact them. This list is available by calling the Commission's toll-free number, 1-800-522-2404.

If you have questions about any of the matters described in this summary, please visit **idahopower.com**, call Idaho Power at 1-800-488-6151 or the Commission's Consumer Services Division. If you do not speak English, please try to arrange in advance for an interpreter to help you. Idaho Power and the Commission are sensitive to special needs of persons who do not speak English, but our offices may not have someone available who speaks your primary language.



WHAT YOU NEED TO KNOW About Our Winter Protection Program

Idaho Power has programs to help our customers who are having difficulty paying their electric bills during the winter heating season. If you need help in managing your winter bills and keeping your account in good standing, you may qualify for one of these programs.

Winter Protection Program

The Winter Protection Program protects you from having your electric service disconnected for non-payment of your electric bills December through February. You are eligible if you have children, elderly, or someone with poor health in your home and are unable to pay your bill in full. When you participate in this program, we encourage you to pay at least a portion of your utility bills during the three-month period to help keep the unpaid balance as low as possible. Once the program concludes, you will be asked to pay the balance due on your account or make new payment arrangements in order to ensure continuous electric service.

Other Assistance Programs

You also may be eligible for assistance in federally funded programs like the **Low Income Home Energy Assistance Program** or the Salvation
Army's **Project Share**. For information on these assistance programs, call **Oregon SafeNet** at **1-800-723-3638**.



After Enrollment

Once you have been enrolled in Idaho Power's Winter Protection Program, you are protected from having your electric service disconnected for non-payment of your electric bills December through February. We encourage you to pay a portion of your electric bills in December, January, and February to help keep the unpaid balance during these winter months as low as possible. Once the program concludes, you will be asked to pay the balance due on your account. Please contact us to make payment arrangements prior to March 1 to avoid service disconnection for non-payment after that date.

Contact Us

For more information on these programs or to declare your eligibility to participate, please contact our Customer Service Center at 208-388-2323 or toll-free 1-800-488-6151 (outside the Treasure Valley).



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