



# Oregon

Kate Brown, Governor

## Public Utility Commission

201 High St SE Suite 100

Salem, OR 97301-3398

**Mailing Address:** PO Box 1088

Salem, OR 97308-1088

503-373-7394

October 6, 2020



BY EMAIL

Idaho Power Company

Lisa Nordstrom, lnordstrom@idahopower.com

sbuckner@idahopower.com

dockets@idahopower.com

RE: Advice No. 20-08

At the public meeting on October 6, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1153. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: October 6, 2020**

**REGULAR**  **CONSENT**  **EFFECTIVE DATE** October 7, 2020

**DATE:** September 28, 2020

**TO:** Public Utility Commission

**FROM:** Mitchell Moore

**THROUGH:** Bryan Conway, John Crider, and Matt Muldoon **SIGNED**

**SUBJECT:** IDAHO POWER COMPANY:  
(Docket No. ADV 1153/Advice No. 20-08)  
Request to update Schedules 15 and 41, related to street and area lighting.

**STAFF RECOMMENDATION:**

Staff recommends that the Public Utility Commission of Oregon (Commission) approve Idaho Power Company's (Idaho Power or Company) filing that revises its Schedules 15 and 41 to allow for light-emitting diode technology in street and area lighting, with an effective date of October 7, 2020.

**DISCUSSION:**

Issue

Whether the Commission should approve Idaho Power's proposed revision to its Schedule 15 - Dusk to Dawn Customer Lighting, and Schedule 41 – Street Lighting Service to allow for light-emitting diode technology, effective on and after October 7, 2020.

Applicable Law

Under ORS 757.205(1):

Every public utility shall file with the Public Utility Commission, within a time to be fixed by the commission, schedules which shall be open to public inspection, showing all rates, tolls and charges which it has established and which are in force at the time for any service performed by it within the state, or for any

service in connection therewith or performed by any public utility controlled or operated by it.

The Commission may approve tariff changes if they are deemed to be fair, just, and reasonable. ORS 757.210. Tariff revisions may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0025. OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules must include in its filing a statement plainly indicating the increase, decrease, or other change made with the filing, the number of customers affected by the proposed change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change.

Filings that propose any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the change. ORS 757.220; OAR 860-022-0015. Tariff filings to be effective on less than 30 days following notice of the change may be authorized with a waiver of less than statutory notice pursuant to ORS 757.220 and OAR 860-022-0020.

## Analysis

### *Background*

On July 17, 2020, Idaho Power filed Advice No. 20-08, requesting an update to Dusk to Dawn Customer Lighting, and Schedule 41 – Street Lighting Service. The purpose of the filing is to allow the Company to offer light-emitting diode (“LED”) technology, and to eliminate the options for high-intensity discharge (“HID”) street lights and area lights.

Schedule 15 applies to electric service provided for the outdoor dusk to dawn lighting of commercial, industrial, and residential customer grounds, yards, driveways, and premises. Customers served under Schedule 15 are charged on a per lamp basis for the type and wattage of lamp. These lights are owned and operated by the Company.

Schedule 41 applies 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. This schedule provides options for both Company-owned and customer-owned lights.

The Company states in its filing that changing technology within the lighting industry has created 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 manufacturer and other manufacturers,

the Company states that 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.

The Company's filing points to 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 41 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.

The tariff changes proposed in this filing will have no impact on customer rates.

### Conclusion

Staff is satisfied that the changes are appropriate and reasonable, and do not harm rate payers' interests. Accordingly, Staff recommends the revisions to Schedules 15 and 41 be approved.

### **PROPOSED COMMISSION MOTION:**

Approve Idaho Power Company's filing that revises its Schedules 15 and 41 to allow for light-emitting diode technology in street and area lighting, with an effective date of October 7, 2020.



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)