



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

February 11, 2021



BY EMAIL

Idaho Power Company

dockets@idahopower.com

lnordstrom@idahopower.com

RE: Advice No. 20-16

At the public meeting on February 11, 2021, the Commission adopted Staff's recommendation in this matter docketed as ADV 1224. 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: February 11, 2021**

REGULAR CONSENT EFFECTIVE DATE February 12, 2021

DATE: February 1, 2021

TO: Public Utility Commission

FROM: Sabrinna Soldavini

THROUGH: Bryan Conway and John Crider **SIGNED**

SUBJECT: IDAHO POWER COMPANY:
(Docket No. ADV 1224/Advice No. 20-16)
Requests Updates to Rule F, Service Connection and Discontinuance.

STAFF RECOMMENDATION:

Staff recommends that the Public Utility Commission of Oregon (Commission) approve Idaho Power Company's (Idaho Power, IPC, or Company) request to update Rule F, Service Connection and Discontinuance, effective with service rendered on and after February 12, 2021.

DISCUSSION:

Issue

Whether the Commission should approve Idaho Power's Advice No. 20-16, which modifies its Rule F, Service Connection and Discontinuance, by changing language related to reconnection and field service visit charges, in accordance with Order No. 20-401, effective with service rendered on and after February 12, 2021.

Applicable Law

ORS 757.205 requires public utilities to file schedules showing all rates, tolls, and charges for service that have been established and are in force at the time. Pursuant to ORS 757.210, the Commission may approve tariff changes if they are deemed to be fair, just, and reasonable.

Filings that make 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 changes. 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 March 8, 2020, Oregon Governor Kate Brown declared a state of emergency due to the public health threat posed by COVID-19, and directed Oregonians to stay at home to the greatest extent possible in Executive Order No. 20-12 (March 23, 2020). The state of emergency has been extended, most recently, in Executive Order 20-67 (December 17, 2020) to last through March 3, 2021, unless extended or terminated earlier by the Governor.

On June 9, 2020, the Commission conducted a Special Public meeting on the “Impact to Utility Customers during the COVID-19 Pandemic and Future Economic Recovery.” As a result of this meeting, Docket No. UM 2114 was opened to address the challenges caused by the COVID-19 Pandemic. A stipulated Agreement in Docket No. UM 2114 was approved by the Commission in Order No. 20-401 on November 5, 2020.

On December 31, 2020, the Company filed Tariff Advice No. 20-16, requesting that the Rule F language be modified to state that a Service Connection Charge or Field Visit Charge *may* be assessed at the time service is connected or 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 action at the time of the visit. Currently, the tariff language states that customers *will* be charged. Changing the language from ‘will’ to ‘may’ is done in to better align the tariff with Order No. 20-401, which waives reconnection and disconnection charges for residential customers through October 1, 2022.

Review

The ongoing COVID-19 pandemic has created added financial burden on many ratepayers. In Order No. 20-401, the Commission adopted a stipulation addressing the effects of the pandemic on energy utility customers. The terms of this Order include a provision, paragraph 11, under which utilities agree not to apply service disconnection and reconnection fees to residential customers through October 1, 2022.¹ This requirement extends through October 1, 2022, though the parties to the stipulation have

¹ UM 2114, Order No. 20-401, Appendix A at 15.

agreed to confer on or about October 1, 2021, to determine whether to request that the Commission modify the October 1, 2022, end date.

Staff has reviewed the Company's filing, and finds that the requested modification to Rule F, Service Connection and Discontinuance, which allows the Company to waive reconnection and field service visit charges for residential customers, conforms to Commission Order No. 20-401.

Staff further finds that the proposed modifications to Rule F will benefit those customers who have experienced increased financial hardship due to the COVID-19 pandemic.

Conclusion

Based on the circumstances outlined above, and Staff's review of the Company's filing, Staff concludes that Idaho Power's request to modify Rule F, Service Connection and Discontinuance, is in compliance with Order No. 20-401.

Staff further concludes that the requested changes will result in rates that are fair, just, and reasonable, and recommends that the Commission approve the Company's tariff as proposed in Advice No. 20-16.

PROPOSED COMMISSION MOTION:

Approve Idaho Power's request to modify Rule F, Service Connection and Discontinuance, in accordance with Commission Order No. 20-401, effective with service rendered on and after February 12, 2021.

RULE F
SERVICE CONNECTION AND
DISCONTINUANCE

1. 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 may 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. (C)

2. Service Discontinuance. At the Customer's request, the Company will disconnect service during normal working hours. There is no charge for discontinuing service.
 - a. 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. Termination Practices. 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. Pursuant to OAR 860-021-0407, 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 on any day or when the forecasted nighttime low falls below 10 degrees Fahrenheit on any day.

4. Field Visit. A Field Visit Charge, as specified in Schedule 66 may 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. (C)