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VIA ELECTRONIC FILING

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

RE: UM 2114 – Response to Staff’s Request for Comments

Attention Filing Center:

On September 29, 2021, the Oregon Public Utility Commission (“Commission”) Staff provided an informal email update to stakeholders regarding the UM 2114 Paragraph 28 Workshops. In that update, Staff provided their thoughts on how existing Commission protections should be considered going forward and whether temporary protections that were put in place through the Stipulated Agreement and Commission Order No. 21-236 should be made permanent. Idaho Power Company (“Idaho Power” or “Company”) appreciates the opportunity to consider the thoughts presented by Staff and provides the following comments in response to Staff’s update.

Customers on Energy Assistance:

- 1. 45-day notice in lieu of a 15-day notice (860-021-0405) to allow time to obtain necessary funding.**

Idaho Power does not believe extending the existing notice requirements is necessary or in the best interest of customers. As required under OAR 860-021-0405, Idaho Power currently provides all past due residential customers with a 15-day notice of disconnection, a 5-day notice of disconnection, and personally attempts to contact the Customer on the day of disconnect occurring via a Company representative knocking on the door prior to interrupting service. Additionally, the Company also provides past due customers with an automated phone call prior to the 5-day notice of disconnection being sent. It is important to note that notices are only sent after a customer has missed two due dates without making a payment to satisfy their original balance and has also failed to contact the Company to make other arrangements. Notably, under the Company’s current billing and collections process, customers have 63 days from when their initial bill is mailed to when

disconnection for nonpayment of said initial bill may occur.

During this 63-day credit and collection cycle, customers can contact the Company to make a payment, enroll in a Time Payment Arrangement (“TPA”), or otherwise work with the Company to find a mutually agreeable option that prevents disconnection from occurring. Past due customers who advise the Company that they’ve received an energy assistance pledge will have their pending disconnection cancelled for 42 days. If the Company does not receive the customer’s pledged energy assistance funds within these 42 days, the Company will restart the disconnection process and reissue a 15-day notice of disconnection to the customer.

By extending the noticing timeline requirements for only energy assistance recipients, those customers who may otherwise qualify to receive energy assistance but were unable to do so, due to energy assistance funding limitations or some other factor, would be precluded from the proposed extended protection. Therefore, similarly situated customers could end up being treated differently due to factors outside of the Company’s control. The Company also believes that further increasing the length of time that customers are able to remain in arrears may result in an increase in bad debt expense which could ultimately result in increased rates for all customers within the class.

If the Commission ultimately determines separate notice requirements are warranted, the Company notes that in order to automatically separate and extend noticing processes for customers that have received energy assistance, systematic enhancements to the Company’s Customer Relationship and Billing (“CR&B”) system, such as being able to dynamically determine whether a customer is a recent energy assistance recipient, would be required.

In consideration of the above, the Company does not support a 45-day notice in lieu of a 15-day notice to allow time for customers on energy assistance to obtain necessary funding in order to avoid disconnection for nonpayment.

2. TPAs extended to 24 months

Similar to some of the items outlined above, the Company is concerned about the impact that a permanent TPA duration extension may have on bad debt expense, required CR&B enhancements, and inequitable treatment of similarly situated customers. Additionally, the Company does not believe there has been sufficient time to evaluate whether 24-month long TPAs are effective and promote positive customer payment behavior. Specifically, and based on all residential customers participating in the Payment Arrangement Match option of the Company’s Arrearage Management Program (“Program”), over 70% of customers enrolled in the 12-month match option (a 24-month TPA) through August 2021 broke the terms of their arrangement by not making their agreed upon monthly payment after enrolling in the Program. For these reasons, the Company does not currently support permanently

extending TPA durations for up to 24 months.

3. Waive reconnect fee and field visit charge (once, maybe twice per year) (860-021-0330 and 0420).

Waiving a number of reconnect fees and field visit charges per year for customers on energy assistance may similarly lead to costs being unnecessarily allocated to the entire customer class and could therefore result in higher rates. Such a practice is contrary to the cost causation principle which seeks to identify and recoup costs from customers causing said costs to be incurred, thereby preventing upward rate pressure through the socialization of the incurred costs.

The Company does not support waiving a number of reconnect fees and field visit charges per year for customers on energy assistance due to rate impact concerns for the customer class. However, if such a waiver is ultimately adopted by the Commission, the Company recommends that remote connect/disconnect capable meters be approved for use in these circumstances in order to minimize utility costs incurred.

4. Waive deposit payments (860-021-0205).

The Company is supportive of Staff's recommendation to revise OAR 860-021-0205 and waive deposit requirements for all residential customers so long as all other non-deposit reconnection rules and requirements remain the same.

5. Allow equal payment when there is a balance on the account (860-021-0414).

The Company believes a similar equal payment option already exists under existing rules for customers with an account balance. OAR 860-021-0415 already allows past due customers the option of enrolling in a levelized payment plan which sums the customer's average annual bill plus any account arrears and divides by twelve, thereby providing twelve equal monthly payments, the first of which is due as a down payment. After having completed the terms of their levelized payment plan, the customer's account may no longer be in arrears and enrollment in the Company's Budget Pay Plan, which also allows for levelized monthly payments, may be available.

Because past due customers already have the option to enroll in a levelized payment plan under existing TPA rules, the Company does not believe it is necessary to modify its Budget Pay Plan to allow customers in arrears a duplicative option of enrolling in a levelized payment plan.

- 6. Notify Energy Trust of customers placed on Energy Assistance. Share customer information, including energy usage and billing data.**
 - **Require Energy Trust to track EA customer activities and report on energy usage (Energy Usage Index) pre- / post- interaction.**

Idaho Power administers its own energy efficiency programs.

Medical Certificates:

- 7. Maintain two-month self-certification (860-021-0410).**

The Company is supportive of Staff's recommendation to revise OAR 860-021-0410 and allow up to two months for qualifying medical professionals to submit confirming certification.

- 8. Maintain not required to enter a TPA (860-021-0415).**

The Company believes that enrollment in a TPA should be required for customers taking service under a medical certificate in order to help prevent customer balances from becoming unmanageable. Additionally, because there is not a limit to the number of medical certificates that a customer is able to take service under, not requiring customers to enroll in a TPA could result in the Company's bad debt expense increasing and therefore causing upward pressure on rates.

Severe Weather Moratorium (860-021-0407):

- 9. Add AQI (100 and above (or 150 and above)) to the rule.**

In accordance with Commission Order No. 21-236 in Docket No. UM 2114, the Company has put in place a customer protection which prevents disconnections from occurring in areas where the day's Air Quality Index ("AQI") is 101 or higher. The Company supports a customer protection for when the AQI is 101 or higher being made permanent and being included in OAR 860-021-0407.

- 10. Add wildfire displacement (no disconnects during an evacuation order; or the day of and day after the order has been lifted) to the rule.**
 - **Potentially adding a reconnection rule for customer's impacted by wildfires and recently disconnected, i.e. last 72 hours.**

The Company supports adding wildfire displacement to the rule to help mitigate disconnections from occurring during an evacuation order and on the day of and day after the evacuation order has been lifted. However, the Company is concerned

about its ability to comply with this rule update because it may not always be notified or made aware of all evacuation orders being issued within its service area. Therefore, it's possible the Company may not always be knowledgeable of when compliance with the proposed disconnection and reconnection rule provisions is required and would request some flexibility be provided within the updated rule's language. Additionally, the Company would likely have to manually track each evacuation order it's made aware of until a systematic solution could be developed and implemented.

11. Add the 3 days before and after 32 degrees.

- **Potentially adding a reconnection rule for customers recently disconnected**

The Company is currently exempt from the temperature threshold specified in section (1) of OAR 860-021-0407.

Due to the weather conditions of higher elevation cities within the Company's service area in Oregon, which may experience prolonged average temperatures under 32 degrees, the Company currently offers a Commission-approved¹ Winter Protection Program from December 1st through the end of February. During the months in which the Company's Winter Protection Program is available for enrollment, residential customers that declare they are unable to pay their bill and whose household includes children, elderly or infirm residents ("Eligible Customers") are protected from disconnection for nonpayment.

12. Add 3 days day before and after a heat advisory.

- **Potentially adding a reconnection rule for customers recently disconnected**

The Company does not support extending the severe weather moratorium period to three days before and after a local heat advisory as implementation of such a requirement may not be practicable due to the variability of weather forecasts.

13. Add an incentive for utility to have a winter protection program, potentially Incentivizing a program that would ban disconnections from Dec 1st – March 1st for customers receiving energy assistance, any customer having difficulty paying their bill if the household has children under 18 years old, people 62 years or older, or people whose health would be threatened by the loss of service. (This would be in lieu of the 32-degree protection listed above)

The Company currently offers a Winter Protection Program which protects Eligible

¹ The Commission approved the Company's Tariff Advice No.17-08 on November 21, 2017.

Customers from being disconnected for nonpayment from December 1st through the end of February. Although the Company believes Winter Protection Programs should be in place to protect the health of medically at-risk customers or occupants, it does not support including receipt of energy assistance as a qualifying measure for program participation for medically healthy households.

Additionally, the Company proposes “infirm” be used opposed to the current suggestion of “people whose health would be threatened by the loss of service.” The suggested verbiage may allow broad entrance by currently healthy individuals into the Company’s Winter Protection Program and therefore may not adequately balance protecting medically at-risk customers or occupants with mitigating the excessive accumulation of past due balances.

Basic Energy Allotment when customers are disconnected:

14. Customers essentially wouldn’t lose all access, but still retain access to a minimal (lifeline) amount of energy for a given period of time as they obtain funding to be reconnected.

- **Funded through a blend of tariff/voluntary-giving programs.**

May require investments in smart/net meters or other infrastructure investments

Customers’ equipment is designed to operate within a specific voltage range and deviating outside that range would result in power quality issues including the potential for mis-operation and damage to the equipment. As such, the Company is currently not aware of a way to provide a “lifeline” amount of energy, without having control of customers’ specific outlets, appliances or loads, while still being able to provide acceptable power quality. Additionally, the investment in infrastructure necessary, if such a proposal were possible, would likely far outweigh any program benefits achieved. Therefore, the Company does not support a basic energy allotment program after a customer has been disconnected.

Voluntary Programs:

15. We would like to introduce procedure for allowing customers to donate money to a fund for disconnection abatement. This fund will be included on every customer bill and will allow for rounding up or making a specific donation amount. Those funds would be dispersed to customer’s facing disconnection, i.e. to defray costs associated with disconnection. These funds should be dispersed to customers, with minimal (>10% of total funds being spent on administrative costs.)

The Company believes its existing voluntary program, Project Share, is similar to the

program proposed by Staff and achieves the same objective. Idaho Power's Project Share is a year-round bill pay assistance program that provides a one-time payment of up to \$300 a year to qualified Idaho Power customer households and can also be used to pay reconnection fees resulting from an involuntary disconnection. In addition to funds contributed by shareowners, contributing customers have the option to round-up their monthly bill, sign up for an on-going fixed contribution or elect to round up and add a fixed amount to their monthly bill.

Project Share is administered by the Salvation Army in Baker County and Community in Action in Malheur and Harney counties.

Idaho Power appreciates the opportunity to review and respond to Staff's proposals and looks forward to continued discussions with all stakeholders during this workshop series.

Sincerely,



Connie Aschenbrenner

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