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August 18, 2021

Via Electronic Filing

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

RE: Investigation into the Effects of the COVID-19 Pandemic on Utility Customers  
UM2114

Attention Filing Center:

Idaho Power Company (“Idaho Power” or “Company”), provides the following comments in response to Oregon Public Utility Commission (“Commission”) Staff’s request at the July 22, 2021 workshop. Idaho Power has also provided these responses through the survey link, as requested by Staff.  
<https://survey123.arcgis.com/share/78b010de26be4676a8fa7cb8a9ba057c>

- 1. Considering the current process for disconnections for non-payment, how would you assess or evaluate the manner in which utilities currently handle those procedures? Are there policy updates that you might recommend? Is proper notification given? The window of time in which a disconnection can occur – is it small enough, large enough, etc.? (The goal for this question is process improvement.)**

Idaho Power’s current processes for billing and disconnections for non-payment are governed by the applicable Oregon Administrative Rules (“OARs”) and the Company’s Commission-approved tariff. If a customer is eligible for disconnection due to non-payment, Idaho Power provides written notices (reminder notice and a final disconnect notice) and a phone call to engage with the customer in advance of disconnection. On the day of scheduled disconnection, a Company representative will also knock at the door prior to interrupting service as a final means of engaging with the customer of record. If at any time during this process a customer contacts Idaho Power to set up a payment arrangement or make another pledge on the account (e.g., a promise to pay with energy assistance funds), the disconnection order will be canceled and time will be provided to allow the customer to honor the commitment on the account.

Additionally, Idaho Power’s severe weather program ensures customers are not disconnected for non-payment during extreme conditions. Idaho Power’s Winter Protection Program suspends

disconnection for nonpayment from occurring from December 1 through the end of February for eligible residential customers (those who declare they are unable to pay their bill and whose household includes children, elderly, or infirm). In the summer months, the Company often voluntarily suspends collection activity during extreme heat conditions, even in the absence of a local heat advisory (the minimum requirement under OAR 860-021-0407). Disconnection for non-payment always has, and continues to be, the last resort.

The Company believes the current practices, as outlined in the OARs and the Company's tariffs, are reasonable and that this workshop series should be primarily focused on identifying ways to minimize customers' energy burden, as doing so may more effectively achieve the same result – reducing the number of customers finding themselves in arrears and experiencing the possibility of disconnection.

**2. Arrearage Management:**

- a. Please describe an arrearage management program or arrearage management best practices you believe would cost effectively:**
  - i. Reduce residential arrearages**
  - ii. Prevent additional past due balances from re-accumulating/facilitate on-time payment behaviors.**
- b. Where possible, please point to data sources and/or real-world examples that serve to evidence your response.**

Idaho Power's Arrearage Management Program ("AMP") was designed to provide effective bill assistance options for residential customers experiencing a financial hardship due to the COVID pandemic with various arrears amounts while also efficiently utilizing the program's allocated funding in order to assist as many customers as possible. The Company believes the efficient use of program funding has been achieved primarily through the incorporation of program options reliant upon matching a percentage of customer payments, both one-time and in conjunction with a time payment arrangement (which encourages on-time payment behavior). The program also offers an option to partially forgive residential customer arrearages while minimizing amounts socialized for repayment by the general body of customers.

As Idaho Power resumes Oregon collection activities, including disconnections, the Company plans to review whether customers eligible for disconnection have previously participated in its AMP. This analysis will help inform the Company as to whether its AMP has been successful in promoting positive customer payment behavior.

**3. Alternatives to Disconnection:**

- a. Please describe alternatives to disconnection for non-payment. Alternatives should, at a minimum:**
  - i. Be practicable and cost effective,**
  - ii. Incentivize resumption of timely payment,**
  - iii. Discourage habitual non-payment behaviors.**
- b. Where possible, please point to data sources and/or real-world examples that serve to evidence your response.**

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The Company views disconnection for non-payment as a last resort. Idaho Power believes that by focusing on identifying communication channels that promote customer engagement and ways to minimize customers' energy burden, a more effective solution to reducing the number of customers experiencing the possibility of disconnection may be achieved. Through the workshop series, Idaho Power would like to identify improvements in its communication methods and customer education that will provide customers with the information they need to manage their energy bills and promote participation in energy efficiency and weatherization programs to help customers manage their ongoing energy use.

Sincerely,



Connie Aschenbrenner

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