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Brad M. Purdy
Attorney at Law
2019 N. 17th St.
Boise, Idaho 83702
(208) 384-1299
Cell: (208) 484-9980
Fax: (208) 384-8511

October 25, 2007

Re: Case No. AVU-E-07-09: Comments of Community Action Partnership Association of Idaho in response to Commission Order 30437 – AVISTA remote disconnect pilot program.

Pursuant to Commission Order No. 30437, the Community Action Partnership Association of Idaho, (CAPAI), hereby submits its response to the Commission's Order of Modified Procedure seeking comments on both procedure and the substance of the proposed remote disconnect pilot program.

For the reasons stated below, CAPAI opposes both the requested approval of the pilot program, the use of modified procedure, and respectfully requests that the Commission conduct a brief technical hearing in this matter.

Clearly, AVISTA is proposing this program because it believes that it and its shareholders will realize benefits from the ability to remotely disconnect a customer for non-payment without sending out a company representative to personally attempt collection from the customer. While this could significantly decrease costs for the Company, the proposed pilot program not only fails to offer a quid pro quo to customers, but diminishes the level of service currently being provided.

First, it is quite likely that if the pilot program is approved, the number of customer disconnects will increase dramatically. Currently, the number of disconnects is physically limited by the number of available field staff and vehicles. Remote disconnect will obviously increase the number of potential disconnects.

Second, with premise visits (i.e., "knock and talk"), AVISTA's customers lose the benefit of what is commonly referred to as a "health and human safety" check that company field representatives frequently provide. For example, if an AVISTA collection agent visits a customer because of non-payment and notices an abundance of newspapers and mail accumulated outside, he or she might have reason to believe that the customer is suffering from a serious illness, has taken an unexpected emergency trip to visit a dying relative, might notice the smell of natural gas due to a faulty appliance, that the customer is suddenly very ill, the course of action taken by the company might not only be different, but could potentially secure the physical safety of the customer. With remote disconnection, this benefit will obviously be lost.

CAPAI is also very concerned for the very low-income customers residing in the company's service territory who might not have the benefit of either a telephone or transportation. Currently, 15 of every 100 disconnects pay at the door when a knock and talk is conducted. This, presumably, is at least partially due to the customers' inability to

arrange transportation to the nearest pay station making it more difficult for them to avoid disconnection or get reconnected.

CAPAI recommends that the existing notice requirements remain unchanged. CAPAI is also disturbed that remote disconnections and even reconnections takes away a vital communication connection between low-income customers and the company.

CAPAI is also concerned about the precedent that AVISTA's sets for other utilities that do not have the same customer service record that AVISTA has. This could ultimately lead to a lowered standard regarding notice requirements.

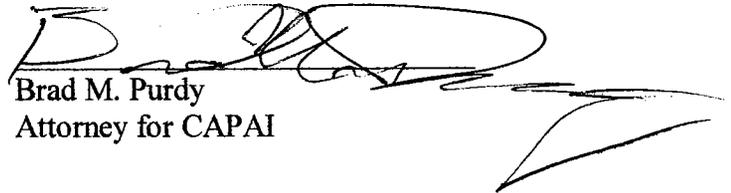
CAPAI is concerned that approval of this pilot program could easily lead to time-of-use issues and their disproportionate affect on low-income customers.

Finally, CAPAI is concerned about the cost of the remote disconnection program and how those costs will be allocated (i.e., will the customers who are remotely disconnected or reconnected bear the entire burden of the program?). And though premature, if AVISTA's remote program will ultimately reduce costs, why should there be cost recovery at all?

SUMMARY

As an alternative to conducting a full, technical hearing, CAPAI proposes deferring approval of the program for a limited, reasonable period of time for all interested persons to express their concerns and attempt to work out reasonable solutions with the company. There has been only one relatively brief telephone conference conducted thus far and Commission Staff's technical experts were unable to participate due to other commitments. CAPAI suggests that the Commission order a workshop, following proper notice, to include any interested person and possibly avoid regretting mistakes that could have been corrected at the commencement of the pilot period.

RESPECTFULLY SUBMITTED, this 25th day of October, 2007.


Brad M. Purdy
Attorney for CAPAI