

1 Brad M. Purdy
2 Attorney at Law
3 Bar No. 3472
4 2019 N. 17th St.
5 Boise, ID. 83702
6 (208) 384-1299
7 FAX: (208) 384-8511
8 bmpurdy@hotmail.com
9 Attorney for Petitioner
10 Community Action Partnership
11 Association of Idaho
12

RECEIVED
2007 OCT 25 PM 4: 04
IDAHO PUBLIC
UTILITIES COMMISSION

13

14 BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

15

16

17 IN THE MATTER OF THE APPLICATION)
18 OF PACIFICORP DBA ROCKY MOUNTAIN)
19 POWER FOR APPROVAL OF CHANGES TO)
20 ITS ELECTRIC SERVICE SCHEDULES.)

CASE NO. PAC-E-07-05

21

22

23

24

_____)

REBUTTAL TESTIMONY
OF JON HOWAT

1 Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS
2 ADDRESS.

3 A. My name is John Howat, and I am a Senior Policy Analyst at the National
4 Consumer Law Center, 77 Summer Street, 10th Floor, Boston, MA 02110.

5 Q. FOR WHOM ARE YOU TESTIFYING IN THIS PROCEEDING?

6 A. I am providing comments and testimony on behalf of Community Action
7 Partnership of Idaho ("CAPAI").

8 Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY ON BEHALF OF
9 CAPAI IN THIS PROCEEDING?

10 A. Yes.

11 Q. HAVE YOU HAD THE OPPORTUNITY TO REVIEW THE REBUTTAL
12 TESTIMONY IN THIS PROCEEDING OF ALL OTHER PARTIES?

13 A. Yes, the only other party that I am aware of who filed testimony regarding the
14 issues I addressed in my direct testimony is that of Daniel Klein on behalf of the
15 Commission Staff and I have reviewed that testimony.

16 Q. PLEASE SUMMARIZE THE PURPOSE OF YOUR REBUTTAL
17 TESTIMONY.

18 A. The purpose of my rebuttal testimony is comment on Staff's recommendations
19 regarding the Company's proposed reconnection charges, after normal office
20 hours for reconnection, and collection agency fees or collection costs that the
21 Company proposes to pass along to individual customers.

22 Q. DO YOU SUPPORT COMMISSION STAFF'S RECOMMENDATIONS AS
23 OUTLINED ON PAGE 2 OF MR. KLEIN'S TESTIMONY?

24 A. Yes.

25 Q. DO YOU HAVE ADDITIONAL COMMENTS REGARDING THESE
26 RECOMMENDATIONS?

1 A. Yes. The Company's proposals to increase reconnection charges, to reduce the
2 hours offered for after hours reconnection of service, and to pass along collection
3 agency fees and related collection costs to individual customers would all
4 disproportionately burden low-income customers. As demonstrated in previous
5 testimony in this proceeding, low-income utility customers are more likely than
6 their higher-income counterparts to experience disconnection of service for non-
7 payment. Because reconnection charges, reconnection service quality and
8 proposed collection agency fees only apply, or are intended by the Company to
9 apply, to customers who have experienced loss of service, the Company's
10 proposed changes would disproportionately impact low-income customers. Put
11 another way, low-income customers would be more likely than higher-income
12 customers to suffer adverse consequences of the Company's customer service
13 proposals. Low-income customers are least able to absorb these adverse financial
14 consequences while paying for necessities of life. For this reason, and for those
15 delineated in Mr. Klein's testimony, CAPAI supports the recommendations as
16 outlined on Page 2 of Mr. Klein's testimony.

17 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

18 A. Yes.