

RECEIVED

2010 NOV 16 AM 10:18

IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE)
APPLICATION OF ROCKY) CASE NO. PAC-E-10-07
MOUNTAIN POWER FOR)
APPROVAL OF CHANGES TO ITS) Rebuttal Testimony of Barbara A. Coughlin
ELECTRIC SERVICE SCHEDULES)
AND A PRICE INCREASE OF \$27.7)
MILLION, OR APPROXIMATELY)
13.7 PERCENT)**

ROCKY MOUNTAIN POWER

CASE NO. PAC-E-10-07

November 2010

1 **Q. Please state your name, business address and present position with**
2 **PacifiCorp dba Rocky Mountain Power (the “Company”)?**

3 A. My name is Barbara A. Coughlin, 825 NE Multnomah, Portland, OR 97232. My
4 present position is Director, Customer and Regulatory Liaison.

5 **Qualifications**

6 **Q. Please describe your educational and professional background?**

7 A. I have worked in the gas and electric industry since 1978. I received a Legal
8 Assistant Certificate from Marycrest College in 1991. From 1978 to 1997, I held
9 various positions in increasing levels of responsibility within the legal/regulatory
10 department of Iowa-Illinois Gas and Electric Company, a predecessor company to
11 MidAmerican Energy Company. In 1997, I was promoted to a customer services
12 supervisor and in 1999 was promoted to customer services manager at
13 MidAmerican Energy Company. I worked as manager of regulatory projects at
14 PacifiCorp from 2006 through 2008, when I was promoted to my current position
15 of Director of Customer and Regulatory Liaison.

16 **Purpose of Rebuttal Testimony**

17 **Q. What is the purpose of your rebuttal testimony?**

18 A. The purpose of my rebuttal testimony is to respond to testimony of Ms. Marilyn
19 Parker and Mr. Curtis Thaden of Idaho Public Utilities Commission Staff
20 (“Staff”) and respond to testimony of Ms. Teri Ottens representing Community
21 Action Partnership Association of Idaho (“CAPAI”). Specifically I will address
22 the following issues raised by these parties:

- 23
- Landlord Interim Billing and Link Programs;

- 1 • Red Flag Rules;
- 2 • Rebilling;
- 3 • Customer notification for rebilling;
- 4 • Unbilled usage;
- 5 • Meter upgrade;
- 6 • Moratorium and winter payment plan communications;
- 7 • Lend-A-Hand contributions;
- 8 • Energy conversation education;
- 9 • Low income weatherization funding; and,
- 10 • Low income weatherization matching funds.

11 **Landlord Programs**

12 **Q. Please explain the Company's landlord programs.**

13 A. Rocky Mountain Power offers two landlord programs to make it easier for
14 customer to do business with the Company. These programs provide resources
15 for landlords, property owners, and tenants. The first program is known as the
16 Landlord Interim Billing Agreement, and the second program is known as the
17 Landlord Link program.

18 **Q. What is a Landlord Interim Billing Agreement program?**

19 A. A Landlord Interim Billing Agreement is a contractual agreement that ensures the
20 continuance of electric service between tenants for rental properties. Any
21 property owner, landlord or a property management company that has a site or
22 multiple sites is eligible.

1 **Q. Please explain how a landlord participates in this program.**

2 A. A Landlord Interim Billing Agreement form is completed and signed by the
3 landlord. Once the completed form is returned to the Company, the interim
4 billing is set up within our customer service system.

5 **Q. How does the program work?**

6 A. When the tenant applies for electric service at a rental property where there is a
7 signed Landlord Interim Billing Agreement, the Company transfers responsibility
8 for the billing from the landlord's name into the tenant's name. When the tenant
9 later moves out and closes their account, the billing responsibility is automatically
10 transferred back into the landlord's name.

11 **Q. After the Company sets up the interim billing designation within its customer
12 service system, does it retain the agreement signed by the landlord?**

13 A. Yes, the Company retains the Landlord Interim Billing Agreement for six years.

14 **Q. Please explain the Landlord Link program?**

15 A. The Landlord Link program allows the Company to work together with property
16 owners, landlords or property managers to efficiently handle requests by tenants
17 for service when they move in and out of rental units. Participation by the
18 landlord in the Landlord Interim Billing Agreement program is a prerequisite to
19 participate in the Landlord Link program.

20 This Landlord Link program was originally piloted a number of years ago
21 in a university town to make the annual move-in process with students more
22 efficient. The pilot program was well received by the participating landlords and
23 was made available throughout all of the Company's service territories in 2003.

1 While program participation is relatively small, 17 landlords with a total of 452
2 rental units in Idaho, we believe those landlords who participate are pleased with
3 the program.

4 **Q. How does a landlord participate in the Landlord Link program?**

5 A. Information regarding the Landlord Link program is found on the Company's
6 website. A landlord who is interested in participating contacts the Company via
7 email or by telephone. A small group of specially trained call center agents
8 respond to landlords by telephone to explain all aspects of the program. This
9 ensures the landlord has a thorough understanding of their responsibilities as
10 participants, which includes reading the meter as a tenant move in and out,
11 securing the appropriate electric service application information, and verifying the
12 identification of a prospective tenant/customer.

13 **Q. How does Landlord Link work when tenants move in and out of a premise?**

14 A. A participating landlord will work with their tenant by providing them a Landlord
15 Link Application to be completed and signed by the tenant, along with the rental
16 unit's meter reading. This application form requires the same information any
17 other prospective Rocky Mountain Power customer would provide to secure
18 electric service. The form is then sent to the Company via facsimile.
19 Alternatively, the tenant or landlord may submit the same applicant information
20 via an online form found on the Company's website. The online application also
21 includes a field that captures whether it is the tenant or landlord providing the
22 information.

1 **Q. How does the Company handle applications that are incomplete or other**
2 **issues are identified with the information provided?**

3 A. If an issue is found with the application, a contact is made to the applicant or
4 tenant. When a prior debt of the tenant's is discovered, or a deposit is required of
5 the tenant, the company will contact the tenant directly to resolve the issue or
6 work out a payment solution.

7 **Q. What notification is given to the tenant that they are now a Rocky Mountain**
8 **Power customer?**

9 A. When the online application form is completed, an email confirmation is sent
10 notifying of the activation of service for the specific site on a specific effective
11 date. Since the form can be submitted by the tenant or landlord, the email asks
12 the landlord to please provide a copy to the tenant. Additionally, a tenant that has
13 not recently had an account, or was recently on an account with a different
14 revenue class, will receive a Welcome Aboard Kit including a welcome letter and
15 rate information. All tenants get notification with their first bill which is marked
16 *Opening Bill*.

17 **Q. Is there an additional notification the Company will implement to alleviate**
18 **some of Ms. Parker's concerns regarding a third party submitting**
19 **application information to the Company?**

20 A. Yes, the Company is implementing a process to send a postcard to any new tenant
21 at a premise covered under the Landlord Link program, notifying the tenant that
22 electric service has been put in their name at that address.

1 Q. How long does the Company retain the faxed Landlord Link Application and
2 the information gathered through the online Landlord Link Application?

3 A. The Company retains the faxed applications and online information for six years.

4 Q. Ms. Parker states she has concerns with the Company accepting applications
5 for service from third parties and is also concerned that the Company may
6 not have adequate checks and balance in place to meet the requirements of
7 the Federal Trade Commission's Red Flag Rule. Do you believe these
8 concerns are warranted?

9 A. No, I do not. As I indicated earlier, the customer information provided to the
10 Company, whether it comes via fax on the Landlord Link Application or through
11 the online Landlord Link Application, is the same as that required from any other
12 prospective customer requesting electric service from the Company. As a
13 participant in the program, landlords are asked to verify the information on the
14 form and check the tenant's identification.

15 Red Flag Rule

16 Q. Does the Company have a process to address the proposed "Red Flag Rule"?

17 A. Yes. In October 2008, in anticipation of the passage of the Red Flag Rule, the
18 Company implemented a new process to review all new customer accounts for the
19 protection of personal identities. All new customer records are sent through a
20 nightly electronic file process to Equifax for verification of the customer
21 identification. This includes accounts that were created via the phone, online, or
22 through the Landlord Link program. Equifax returns a file to the Company
23 indicating potential and probable discrepancies in personal identifying

1 information provided by the customer. These discrepancies are then investigated
2 by a specially trained team of specialists to follow-up with customers to correct
3 any errors or take other appropriate action.

4 **Q. Has the Company made any changes to its Red Flag process since the 2008**
5 **implementation?**

6 A. Yes. Since 2008 the Company has continued to review and refine the process to
7 ensure it meets the intent of the rule and provides appropriate protections for our
8 customers. As part of Customer Service's ongoing process improvement efforts,
9 early in 2010, a Customer Services review was conducted by personnel not part of
10 the daily work flow. As a result of this review, recommendations for additional
11 account documentation and a tracking mechanism were made and have been
12 implemented. In addition, mid-year 2010, the Company's internal auditors
13 reviewed the process as part of their ongoing compliance review of Company
14 practices. If any findings are identified, corrective actions will be implemented
15 accordingly.

16 **Rebilling**

17 **Q. Ms. Parker states she identified some concerns in her investigation of the**
18 **Company's rebilling procedures under Rule 204 (UCRR) and indicates that**
19 **the Company does not follow an objective or independent verifiable**
20 **methodology when preparing estimated bills. What methodology does the**
21 **Company utilize to estimate bills when a meter is not read during the**
22 **monthly meter reading window?**

23 A. The Company utilizes system logic for estimating regular monthly bills. I will

1 describe the details of the system logic later in my testimony.

2 **Q. What methodology does the Company utilize to rebill a customer when a**
3 **meter malfunctions or fails, when the meter equipment was incorrectly**
4 **installed or programmed, or when bills were inaccurately prepared?**

5 A. For all the conditions described above, the rebilled amounts are manually
6 calculated; system generated estimates are not used. The method used to
7 calculate the billing adjustment for each condition referenced above varies.

8 **Q. Please provide a sample of the method used to calculate the usage for a meter**
9 **that has been unregistering consumption for a specified period of time?**

10 A. As an example, if a meter was tested and the results reflect a ninety-two percent
11 accuracy rate, the amount of the adjustment to the customer's monthly bill would
12 be eight percent of the usage in the allowed months for backbilling. Another
13 example would be if the meter was tested and the results reflect a 107 percent
14 accuracy rate, the amount of the adjustment would be a seven percent credit of the
15 usage in the allowed months for backbilling.

16 **Q. How does the Company rebill a customer in the situation where the**
17 **customer's meter stopped functioning?**

18 A. A billing adjustment in the situation of a stopped meter is based on a manual
19 calculation of historical usage of the site, using a per day average. If there is no
20 available usage for the site to base the manual per day usage calculation, after the
21 Company sets the new meter, a special meter reading is obtained in order to
22 determine an average per day usage for the allowed months of backbilling.

1 **Q. Please explain how billing adjustments are calculated in a cross meter**
2 **situation.**

3 A. A cross meter situation exists when tenant A is billed for the service used by
4 tenant B, and tenant B is billed for the service used by tenant A. Generally, this
5 circumstance occurs when an electrician or property manager has mislabeled the
6 meter bases.

7 In this circumstance the actual amount of usage for both parties is known.
8 To make a billing adjustment tenant A would be credited for the usage billed
9 during the appropriate time period and debited for the usage of tenant B during
10 the appropriate time period; tenant B would be credited for the usage billed during
11 the appropriate time period and debited for the usage of tenant A for the
12 appropriate time period.

13 **Q. Is there any time when the Company estimates usage for a billing adjustment**
14 **based on a neighboring property's usage?**

15 A. No, there is not.

16 **Q. Please describe the methodology of the system logic the Company utilizes to**
17 **bill a customer when a monthly meter reading cannot be obtained?**

18 A. The Company's system logic for estimating a monthly meter reading is based
19 upon the kWh consumption from the same month last year, plus the usage from
20 the month before, and the month after that month. The kWh usage from the three
21 months is used to calculate an average per day usage which is then used to
22 calculate the estimated use for the current month. Any variance in the estimated
23 read to the actual customer usage would be adjusted for when the meter is read

1 the following month.

2 **Q. Ms. Parker believes the Company's method of rebilling is problematic and**
3 **there are more accurate ways to prepare corrected billings such as that**
4 **utilized by both Avista Utilities and Intermountain Gas Company which**
5 **have implemented rebilling mechanisms that employ National Weather**
6 **Service's Heating and Cooling Degree Days. Please describe any known**
7 **issues or customer dissatisfaction the Company has experienced with its**
8 **system logic.**

9 **A.** The Company has utilized the system logic described above for over 14 years.
10 Customer feedback concerning estimated bills is minimal and the minimal
11 feedback mainly focuses on the fact that a meter was not read, rather than the
12 estimate itself. When a customer expresses concern about an estimated read, we
13 ask the customer to read the meter and provide us a read, or we will send someone
14 out to get a read, and we are more than willing to make an adjustment.

15 **Q. What is the Company's experience with reading meters on a monthly basis?**

16 **A.** Over the last several years the Company has consistently been reading ninety-
17 eight percent of Idaho meters within the designated monthly meter reading
18 window of one day prior to the scheduled meter reading day and up to five days
19 after the scheduled meter reading day, and eighty percent of Idaho meters in 2009
20 were read on the scheduled meter reading day. This means only two percent of
21 monthly bills are calculated using an estimated meter reading.

22 **Q. Why does the Company utilize a meter reading window?**

23 **A.** Having a meter reading window enables the Company to provide monthly bills

1 calculated by using actual usage, yet allows for scheduling constraints such as
2 weather-related issues, training, or personnel on vacation or ill.

3 **Q. Has the Company investigated or contemplated a change to its system logic**
4 **for estimation of monthly bills?**

5 A. No. Because of very limited customer feedback, a continued decline in the
6 number of estimated reads, the fact that the Company is an electric only utility,
7 and electricity is typically not the primary heat source for the majority of our
8 customers, the Company has not found it necessary to investigate other estimation
9 methodologies.

10 **Q. Should the Company's current methodology be changed?**

11 A. No. We believe our current methodology is reliable as it is specific to the
12 individual customer's premise and lifestyle. The Company believes that the cost
13 to develop a more complex estimating routine that would bring additional costs to
14 our customers to develop and maintain, is not in the best interest of our customers.
15 Also our current estimating logic is straightforward and easy for customers to
16 understand.

17 **Notification of Rebilling**

18 **Q. Ms. Parker, on page 11 of her testimony also raised concerns about**
19 **communications with customers whose meters malfunctioned and were**
20 **rebilled. How does the Company notify a customer when it is necessary to**
21 **rebill?**

22 A. When a billing adjustment is made to a customer's account, the customer is
23 provided notification on their next regular bill.

1 **Q. What does the notification on the customer's next regular bill include?**

2 A. The adjustment section on the bill will include the month of the adjustment,
3 reason for adjustment, dates of service, and the amount of the adjustment.
4 Documentation is added to the customer's account providing details of the billing
5 adjustment including the reason for the billing adjustment, in the event the
6 customer contacts the Company to discuss the adjustment.

7 **Q. Is there any other notification that the customer receives?**

8 A. For complex billing adjustments such as corrections due to crossed meters,
9 adjustments associated with guarantee requests (which are a result of a customer-
10 initiated contact), adjustments greater than \$10,000, and adjustments for managed
11 accounts, the customer is notified of the adjustment directly, either by phone or by
12 mail using the Company's billing adjustment letters. These contacts are made
13 prior to the customer receiving the adjusted bill. The letter sent to the customer
14 notifying them of a billing adjustment advises the customer of their option of an
15 interest free payment plan. Upon request of the customer, the Company also
16 provides the customer a spreadsheet with the details of the billing adjustment.

17 **Q. What is a guarantee request?**

18 A. When a customer has made a contact with us concerning a billing inquiry or to
19 investigate a meter problem, the Company is committed to investigate under its
20 customer guarantee program these concerns and to respond within ten working
21 days, with a full report of the investigation. When the Company has the results, a
22 Company representative will call and inform the customer. If the Company's
23 representative was not able to reach the customer via phone, a letter is sent to the

1 customer with the results and any necessary billing adjustment.

2 **Q. Ms. Parker recommends that the threshold of \$10,000 should be much lower**
3 **when it comes to calling a customer if the adjustment amount exceeds**
4 **\$10,000. Do you support this recommendation?**

5 A. Because of the categories of billing adjustments that currently receive telephone
6 calls or letters as outlined above (complex adjustments, customer-initiated
7 adjustment known as guarantee reviews, adjustments of \$10,000, and managed
8 accounts), we find the current process meets the expectations of the majority of
9 customers. However, the Company is agreeable to changing the threshold for
10 sending letters for billing adjustment of \$5,000 or more, rather than \$10,000 for
11 customers receiving an adjustment that is not covered in one of the other
12 categories outlined above. And, the Company will continue to send spreadsheets
13 to those customers requesting the billing adjustment information in that format.

14 **Unbilled Usage Due to Leaving Service Connected**

15 **Q. Ms. Parker states that the Company's policy allowing service to remain**
16 **connected between customers does not save time, mileage or costs and the**
17 **Company loses a considerable amount of revenue for electricity that went**
18 **unbilled. She states that the presumed net benefit of the policy may be more**
19 **myth than fact. Do you agree with Ms. Parker's determination?**

20 A. No, the Company believes its current process is cost-effective.

21 **Q. Please explain.**

22 A. In 2009, there were 12,701 disconnect read orders generated as reflected in
23 response to Staff's Data Request IPUC 129. Of that 12,701 disconnect read

1 orders created, there were a total of 7,837 customer-initiated account closures
2 where a new customer had not already taken responsibility for the usage at a site
3 at the time account closure was requested. Not all customer-requested
4 disconnections ultimately result in the need for an order to be generated for the
5 field to disconnect service. Of the 7,837 accounts closed, there were only 835
6 instances where field orders to disconnect service were generated for unbilled
7 usage of 1,000 kWh or greater.

8 **Q. What happens once a field order is generated for a disconnection of service?**

9 A. A field metering specialist (referred to as a "collector") is dispatched to the site to
10 leave a notice of impending disconnection or disconnect service depending upon
11 the immediate circumstances such as weather and occupancy.

12 **Q. For the 835 instances in 2009 where field orders were generated, how were
13 these accounts handled?**

14 A. Of these 835 instances, approximately forty-two percent of the orders resulted in a
15 customer taking responsibility for the unbilled usage after receiving a notice of
16 disconnection or having the service disconnected.

17 **Q. How many field orders to disconnect unbilled usage were completed in 2009?**

18 A. In 2009, the Company completed approximately forty-seven percent of the field
19 orders disconnecting power to premises without an active customer.

20 **Q. Can you quantify the amount of revenue that was lost as a result of the
21 remaining sites where unbilled usage was not recovered?**

22 A. Yes. The unbilled usage for 2009 was 798,319 kWh. Based on an average of
23 eight cents per kWh, the unbilled revenue would be approximately \$63,866.

1 **Q. Please describe the financial impact to the Company if it were to change its**
2 **process and follow Ms. Parker's recommendation to disconnect electric**
3 **service between tenants.**

4 A. Again, using the same period as a baseline, there were a total of 7,837 customer-
5 initiated account closures where a new customer had not already taken
6 responsibility for the usage at a site. Following Ms. Parker's recommendation,
7 the Company would need to dispatch an employee to disconnect the service.
8 Based on current activity rates of the personnel needed to disconnect electric
9 service, the approximate cost for completing the 7,837 requests would be
10 \$178,183. Then, when a customer signs for service at the site, the Company
11 would again need to dispatch personnel to connect the service at the site. This
12 would increase the costs to \$356,366.

13 **Q. How does this compare to the costs incurred by following the current**
14 **process?**

15 A. Assuming all 7,837 customer requests for disconnection (identified above)
16 required a closing read and an opening read, the total approximate operational
17 costs would be \$110,621. This is based on a calculation of .16 hours to read the
18 meter at a meter reader's activity rate of \$44.11 for each of the 7,837 requests.

19 **Q. Does that account for the unbilled usage?**

20 A. No. If you add the unbilled usage to the operational costs, the total cost for the
21 current process is approximately \$180,621.

1 **Q. Would all 7,837 requests require a meter reader to obtain a closing or**
2 **opening read?**

3 A. No. If a meter is scheduled to be read within five days of the customer's request,
4 or if it has been read in the five days prior to the customer's request, the Company
5 would use the actual meter reading taken and prorate the bill based on a per day
6 usage to allow for the one to five day addition or reduction in the billing.

7 **Q. What is the main reason for the difference in costs?**

8 A. The cost differences are primarily due to the type of personnel required to work
9 the request and the length of time required to perform the work. A disconnection
10 and reconnection of service requires a field metering specialist, and in cases
11 where the site has 3-phase service a journeyman lineman is needed. However,
12 opening and closing meter reads can be performed by a meter reader, which has a
13 lower activity rate cost. The average time to disconnect or connect a service,
14 including travel, is 0.42 hours (approximately 25 minutes), while the average time
15 for an opening or closing read takes 0.16 hours (approximately 10 minutes).

16 **Q. Please describe the difference in the work classifications of meter reader and**
17 **collector.**

18 A. A meter reader's training and focus is to accurately read the meters to ensure each
19 meter is read at regular monthly intervals. In the majority of cases, meter readers
20 are not electrically trained to disconnect and connect meters. Many meter readers
21 walk their routes and they would not have the necessary tools and personal
22 protective equipment with them in order to disconnect or connect a meter.

23 A collector has specific training and is electrically trained to remove or

1 install a meter to disconnect or connect power. Personal protective equipment
2 must be worn by anyone disconnecting or connecting a meter. Collectors drive
3 from site to site and have tools and safety equipment readily available to them.
4 The collector's work is assigned by priority and is worked/mapped geographically
5 by the collector each day in order to complete as many orders as possible. The
6 work performed by the collector includes collection of past due bills, customer-
7 requested or company initiated disconnection of service, connection of service,
8 reconnection of service, and posting past due notice or other disconnection of
9 service notice.

10 **Q. Has the Company looked at ways to reduce the amount of unbilled usage?**

11 A. The Company continually looks for ways to reduce unbilled usage. In 2007, the
12 Company conducted a pilot in six cities within its six-state service territory. In
13 that pilot the Company left door hangers notifying the occupant of the impending
14 disconnection of service. During that pilot forty-eight percent of occupants who
15 received a notice became customers within three to four days, and were back-
16 billed to the date of their occupancy for the previously unbilled service. In
17 addition to back-billing for the previous unbilled service, past due balances from
18 old accounts were also being collected. The pilot was determined to be successful
19 and the process was updated accordingly and expanded throughout all of the
20 Company's service territory.

21 **Q. What changes to the Company's processes have been implemented since**
22 **2009?**

23 A. In early 2010, a change was made to better enable the Company to track the aging

1 of the orders tied to unbilled usage. In addition, management directives and goals
2 were established to set and work priority orders. While the lost energy use has
3 been identified as a risk of this process, it is continually being reviewed and
4 managed.

5 **Q. How would the Company recover the additional costs outlined above?**

6 A. The Company would need to recover these costs through customer's rates and/or
7 fees.

8 **Q. Does the Company have other concerns with increasing the number of
9 service disconnections in between customers?**

10 A. Yes. First and foremost there are inherent safety risks every time a field metering
11 specialist disconnects or connects a meter. Also it would require additional
12 manpower, could cause customer dissatisfaction, and could increase the number
13 of customer guarantee failures.

14 **Q. Ms. Parker recommends a \$20 initiation fee. What is the Company's
15 position on this?**

16 A. The Company does not believe adding a \$20 initiation fee is appropriate at this
17 time. The Company believes it is effectively managing the unbilled usage orders,
18 and is working to continue to improve on those statistics. In addition, based on
19 the figures provided for 2009, a \$20 fee would not have recovered the costs
20 incurred by disconnecting between tenants.

1 **Q. Ms. Parker believes the Company is sending mixed signals to customers**
2 **when it encourages conservation but leaves service connected when there is**
3 **no customer. Please address this comment.**

4 A. The Company does not believe mixed signals are sent. In most cases the energy
5 used between customers is far less expensive than what would be incurred to
6 connect and disconnect the meter. One of the Company's goals is to educate our
7 customers on various ways to reduce their electrical usage and save energy. This
8 results in a lower bill for our customers and decreases the need to build more
9 power plants or purchase power on the open market. While the Company does
10 agree that efforts to reduce costs and strengthen accuracy should always be
11 explored and implemented as appropriate, the costs of disconnecting the power at
12 all premises outweigh the benefits.

13 **Q. Ms. Parker also mentioned that the Company has no plans to upgrade**
14 **meters to allow for remote reading or remote disconnection and reconnection**
15 **of service. Do you agree?**

16 A. The Company actively researches new technologies and their cost-effectiveness.
17 At this time, the Company does not believe that upgrading to new technology
18 meters in its Idaho service territory is cost-effective.

19 **Q. What recommendations did Mr. Thaden include in his testimony?**

20 A. Mr. Thaden recommends the Commission accept the following recommendations:

- 21 • Direct Rocky Mountain Power to communicate information regarding the
22 Idaho Moratorium and the Winter Payment Plan through revisions to the
23 annual Customer Information brochure and by attaching bill inserts to

- 1 disconnection notices;
- 2 • Encourage the Company to increase funding for the Lend-A-Hand
- 3 program through changes to the way customers can contribute;
- 4 • Direct Commission staff to convene a workshop to examine how best to
- 5 provide energy conservation education to low income customers; and
- 6 • Provide no additional funding for low income energy conservation
- 7 education at this time.

8 **Moratorium and Winter Payment Plan Communications**

9 **Q. Does the Company accept Mr. Thaden's recommendation to increase**

10 **communications related to the Idaho Moratorium and the Winter Payment**

11 **Plan by revising the Customer Information brochure?**

12 A. Yes. The Consumer Information brochure distributed in residential bills annually

13 includes a paragraph on the Winter Payment Plan and information related to the

14 winter moratorium is included under the "Disconnection Notices" section. This

15 brochure is included as Exhibit No. 76. The Company will revise the brochure in

16 an effort to make these two topics more prominent. These changes will be

17 incorporated in the next version that will be printed in late 2010.

18 **Q. Does the Company accept Mr. Thaden's recommendation to attach bill**

19 **inserts to disconnection notices?**

20 A. No. The Company's disconnect notice includes a paragraph describing the winter

21 moratorium. Refer to Exhibit No. 77. The Company will look into a redesign of

22 the notice that will include Winter Payment Plan information. The Company's

23 preference is to include this additional information prominently on the notice as

1 an alternative to creating and attaching a new bill insert. The Company currently
2 has a new supply of disconnection notices but will complete a redesign for use in
3 the fall of 2011.

4 **Lend-A-Hand program**

5 **Q. What comments do you offer with respect to Mr. Thaden's recommendation**
6 **that the Company implement additional ways that customers can contribute**
7 **to the Lend-A-Hand program?**

8 A. The Company promotes the benefits of the Lend-A-Hand program and provides
9 the opportunity for customers to donate regularly. This is accomplished through
10 three donation envelope distributions in bills during the months of November,
11 February and June as well as through the inclusion of program information on the
12 Company's home webpage, on-line payment webpage, in customer newsletters
13 and press releases.

14 **Q. Please refer to Mr. Thaden's Exhibit No. 120. Does the Company support**
15 **the changes to this envelope as suggested by Mr. Thaden on page 15 of his**
16 **testimony?**

17 A. No, the Company is not supportive of changing the mailing address for
18 contributions to the Idaho Lend-A-Hand Program, as the address used goes
19 directly to the Company's central cash remittance operation center where the
20 donations are processed and funds are forwarded monthly to our partnering
21 agencies. However, the Company will change the name on the envelope from
22 "Lend A Hand" to "Idaho Lend-A-Hand" which may make it more evident that
23 the donations will be directed entirely to assist households in Idaho.

1 Q. **What other ways does the Company promote contributions to the Idaho**
2 **Lend-A-Hand?**

3 A. The Company appreciates Mr. Thaden's positive feedback on our marketing of
4 the Lend-A-Hand program. We also promote the Fixed Donation component that
5 allows customers to contribute a designated amount monthly on their bill, through
6 articles in the Company's Voices customer newsletter and press releases. The
7 Company does not have the ability to include a check box on billing statements
8 due to the limitations of our customer service system and remittance processing
9 machines. However, as an alternative, we will include the Fixed Donation details
10 on a tear away flap on payment remittance envelopes during a monthly bill
11 distribution in early 2011. Customers interested in participating in the Fixed
12 Donation program will be able to designate their monthly contribution amount
13 and enroll by including the tear away portion, also called a bangtail, in the
14 envelope with their payment. If this proves to be an effective means of obtaining
15 contributions, we will distribute the bangtail envelopes annually and expand their
16 use to our other state fuel funds.

17 Q. **What comments do you offer regarding Mr. Thaden's statement on page 10**
18 **of his testimony in which he mentions that state funding is not available in**
19 **Idaho?**

20 A. To obtain additional funding to help customers pay their energy bills, the
21 Company believes the answers may be found in the Idaho legislature rather than
22 at the utility.

1 **Energy Conservation Education**

2 **Q. Does the Company agree with Mr. Thaden's recommendation regarding a**
3 **workshop on providing energy conservation education to low-income**
4 **households?**

5 A. Yes. The Company believes it would be worthwhile for Commission staff to lead
6 a workshop with attendees representing electric and gas utilities as well as staff
7 from the local agencies that work with limited income households on a daily
8 basis. It is important for gas suppliers to participate and provide funding for this
9 effort as a large percentage of our residential customers' heating source is natural
10 gas.

11 **Q. Does the Company support Mr. Thaden's recommendation related to the**
12 **funding of low income energy conservation education.**

13 A. Yes. We appreciate that Mr. Thaden recognizes that Rocky Mountain Power staff
14 has worked with CAPAI staff in developing a program plan and goals in an effort
15 to implement this project. Rocky Mountain Power made a one-time commitment
16 of \$50,000 to fund low income energy conservation education in February 2009
17 through a Stipulation in Case No. PAC-E-08-07. Those funds have yet to be used
18 by CAPAI for this effort.

19 **Q. What recommendations from Ms. Ottens will you be addressing?**

20 A. Ms. Ottens recommends the Commission accept the following recommendations:

- 21 • Rocky Mountain Power should increase funding of their Low Income
22 Weatherization Program to reflect a per customer level equal to that of
23 AVISTA; and,

- 1 • Remove the matching requirement where seventy-five percent of each
2 dollar of funding comes from a non-utility source such as U.S. Department
3 of Energy LIHEAP funds.

4 **Low Income Weatherization Funding**

5 **Q. Does the Company support Ms. Ottens recommendation to increase Low**
6 **Income Weatherization Program funding to equal that of Avista?**

7 A. No. The Company's funding of the Low Income Weatherization Program
8 (Schedule 21) cannot be directly compared with other utilities. For example,
9 Avista provides both electric and natural gas service in portions of Idaho, and the
10 Company provides electric service only. A greater percentage of the Company's
11 residential customers use natural gas as a heating source. Since the largest
12 opportunity for energy savings is often related to heating efficiencies, it would be
13 necessary to include funding from the natural gas supplier serving the Company's
14 customers in a funding comparison.

15 **Low Income Weatherization Matching Funds**

16 **Q. What comments does the Company offer with respect to Ms. Ottens**
17 **recommendation to remove the seventy-five percent funding match**
18 **requirement in the Company's Low Income Weatherization Program?**

19 A. Ms. Ottens misstates the matching requirement in effect through the Company's
20 Low Income Weatherization Program (Schedule 21) on page 2 of her testimony.
21 Funding from the Company is available to cover seventy-five percent of the cost
22 of the installation of efficiency measures, and our partnering agencies use just
23 twenty-five percent of funding from other government sources to cover their

1 costs. The Company believes it is appropriate for our customers to obtain benefits
2 from these federal funds as they pay taxes that support these programs. This is
3 accomplished by leveraging a portion, just twenty-five percent of these funds with
4 those obtained through the surcharge to the Company's customers.

5 We appreciate Ms. Ottens reference to the program as a cost effective
6 DSM program. A program evaluation is currently in progress by an external firm.
7 We anticipate this evaluation that will include a cost effectiveness analysis will be
8 completed in February 2011. Order No. 30239 in Case No. PAC-E-06-10
9 requires Rocky Mountain Power to conduct a study to determine the cost-
10 effectiveness of its Weatherization Program after March 31, 2009. The Company
11 initiated the evaluation process in 2010 in order to allow for more completions to
12 be studied under the current program guidelines which were effective April 1,
13 2007. A year or more of post consumption participation data will be included in
14 the analysis. The Company believes it is appropriate for parties to review the
15 results of this evaluation before program changes, including funding revisions are
16 implemented.

17 **Q. Is it appropriate to make changes to the Low-Income Weatherization**
18 **Program (Schedule 21) at this time?**

19 **A.** No. The Company recommends that the program continue to operate under the
20 current tariff, including approved funding levels. Program evaluation results can
21 be reviewed by the Company, staff and interested parties once available. This
22 information will be useful in determining if there are beneficial changes that could
23 be filed for the Commission's consideration.

1 Q. Does this conclude your testimony?

2 A. Yes.

Case No. PAC-E-10-07
Exhibit No. 76
Witness: Barbara A. Coughlin

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Rebuttal Testimony of Barbara A. Coughlin

Consumer Information Brochure

November 2010

Consumer Information

We think our customers deserve excellent service. But what do we mean by that? Giving you clear, straightforward answers when you have questions. This brochure was written in cooperation with the Idaho Public Utilities Commission to give you answers to some common questions about bills, credit, deposits and other parts of your electric service. If you'd like more information on any of the topics we cover here, please call Rocky Mountain Power toll free at 1-888-221-7070 or visit rockymountainpower.net/regulation. Si desea una copia en español de este resumen de los derechos y responsabilidades del consumidor, por favor llame al 1-888-225-2611. Su llamada será gratuita.

Summary of Idaho utility consumer's rights and responsibilities

Rocky Mountain Power has prepared this summary of your rights and responsibilities when you apply for an account with, or are a current customer of a utility company in Idaho.

Customer responsibilities

- Use services safely and pay for them promptly.
- Contact Rocky Mountain Power when you have a problem with payment, service, safety, billing or customer service.
- Notify Rocky Mountain Power about billing or other errors.
- Contact Rocky Mountain Power when you anticipate a payment problem to try to set up a payment plan.
- Notify Rocky Mountain Power when you are moving to another location.
- Notify Rocky Mountain Power about stopping service in your name or about stopping service altogether.
- Allow safe, unobstructed access to your property for meter reading, tree trimming and other essential Rocky Mountain Power personnel and equipment.
- Provide notice to Rocky Mountain Power if you are making any significant change that may affect the electrical character of your load affecting you or others.

Deposits

If you are a current customer with a good payment record or a new customer who has good credit with your previous utility company, you will not need to make a security deposit. If you don't meet these requirements, however, you may be asked to make a security deposit. If a deposit is required, it cannot be more than two months' worth of the estimated yearly billing at your service address, based on current rates. If you can't pay all the required deposit, you can arrange to pay half of the deposit when you apply for service and the rest the following month. Rocky Mountain Power will pay the current interest rate set yearly by the Idaho Public Utilities Commission on all deposits at the time the deposit is returned.

Billing

You will receive a bill for electric service each month, based on the number of kilowatt-hours of electricity registered on your electric meter during the billing period. Your bill will show the date on which your payment is due, the applicable rate schedule and the amount of the bill. You may ask that another person receive your bills and notices if you are unable to receive or understand them.

Payment plans

In deciding on the reasonableness of a payment plan, the company will take into account your ability to pay, the size of the unpaid balance, your payment history, and the amount of time and reasons why the debt is outstanding. There are four types of payment plans that may be available to you:

1. Payment arrangements – If you pay only part of your total bill, your payment will be applied toward the oldest portion of your outstanding balance. If you cannot pay a bill in full, we may be able to make special arrangements with you. To decide if we can offer you these arrangements, we take into account your ability to pay, how much you owe, your payment history and the reasons why you may not have been able to pay. You can make payment arrangements over the phone or by mail. Your first payment will

be due on the next business day after the arrangements have been made. If you miss the first payment, or the check you write to make the payment is not honored by the bank, your service may be disconnected after we make a diligent attempt to contact you 24 hours prior to disconnection of service.

2. Equal Payment Plan – Our Equal Payment Plan is available if you'd like to spread out your payments evenly over a full year. The plan divides the total cost of electricity used each year into 12 equal monthly payments. Every year your account is reviewed to determine if your usage has changed. Any price changes will automatically be figured in the Equal Payment amount.

3. Equal Time Payment Plan – Our Equal Time Payment Plan works the same as our Equal Payment Plan. You are allowed to pay your past due balance with the arrears rolled in to the plan's monthly payments.

4. Winter payment plan – If you tell us that you are unable to pay your electric bill in full and you have children, elderly persons or persons with medical needs living in your household, you may qualify for our winter payment plan. This plan requires that your bill be paid in full, but allows for a lower monthly payment from November to March. Your monthly payments during this time cannot be less than one-half of the amount you would pay if you were using our Equal Payment Plan. You can use any source of funds to make winter payment plan monthly payments. If you have an outstanding balance under this plan, you must either pay this balance or make a new payment arrangement on or after April 1. If you don't pay your balance or don't make payment arrangements on or after this date, your service may be disconnected. You may participate in the winter payment plan in following years if you have made payments as arranged and the balance you owe as of Nov. 1 is not more than \$75 or not more than your bill for the previous 30 days, whichever is greater.

Disconnection notices

Before we disconnect your service, in most instances, we will send you a written notice mailed at least seven calendar days before the disconnection date. However, only a diligent attempt to contact you will be made 24 hours prior to disconnection of service when you do not make a first payment according to a payment arrangement, when you tender a payment with a dishonored check; or make an electronic payment with insufficient funds. At least 24 hours before the service is disconnected, we will attempt to contact you in person or by phone and repeat the information on the original notice. If we do not shut off the service within seven days after the proposed date, we will make another attempt to contact you and remind you that your service can be disconnected after 24 hours. During December, January and February, we will not disconnect your service if there are children, elderly persons or persons with medical needs in the house. Remember to notify us if any of these conditions exist, and we will work with you to set up a payment plan. Before disconnecting your service, we will try to reach an adult in your household or another person you have told us to call in case you cannot be reached. If someone in your household is seriously ill, you can get an extension of up to 30 days by giving us a physician's or public health official's certificate of medical emergency. Also, if someone in your household uses an iron lung, respirator, dialysis machine or other life-sustaining equipment, please let us know. We can disconnect your service at any time without notifying you if: (a) a situation exists that is immediately dangerous to life, physical safety of property or to prevent a violation of health and safety codes; (b) if the IPUC, a court or other authorized public agency orders a disconnection; or (c) if you

obtained service through fraud or without our permission. If you cannot pay the total bill, installment payments may be arranged in the form of a "deferred payment agreement." This agreement says that you will pay your past due bill in installments and keep your current bills paid when due. If you keep the conditions of the agreement, service will not be disconnected.

Moving

You need to let us know as soon as possible if you plan to move. It's a good idea to do this yourself and not depend on someone else to do it for you. We can't close your account or process your closing bill until you provide us with your move-out date.

Consumer organizations

We have lists of consumer organizations that provide assistance in the various communities we serve. If you would like a list of the organizations in your community, call us toll free at 1-888-221-7070.

Schedule I - Standard Service

Best for residential customers who use most of their power during the weekdays.

Monthly bill:

Summer (May-October)	\$0.104093 per kilowatt-hour (kwh)
Winter (November-April)	\$0.080150 per kilowatt-hour (kwh)

Minimum bill:

Single-phase service	\$10.64 for permanent residences \$14.87 for vacation homes, cabins or other dwellings not utilized year-round as the principal place of residence
Three-phase service	\$31.92 for permanent residences \$44.61 for vacation homes, cabins or other dwellings not utilized year-round as the principal place of residence

Seasonal bill: \$178.44 minimum for metered house or cabin used on a seasonal basis

Schedule 36 - Optional Time-of-Day Service

Good for residential customers who use most of their power during off-peak hours.

On-peak hours*: Summer - 8 a.m. to 11 p.m., Monday through Friday, except holidays. Winter - 7 a.m. to 10 p.m., Monday through Friday, except holidays.

Off-peak hours: All other hours.

Holidays: New Year's Day, President's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

Monthly bill:

Summer (May-October)	
Customer service charge	\$13.63 per customer
On-peak energy charge	\$0.113497 per kwh
Off-peak energy charge	\$0.03873 per kwh
Winter (November-April)	
Customer service charge	\$13.63 per customer
On-peak energy charge	\$0.09695 per kwh
Off-peak energy charge	\$0.035447 per kwh

Minimum bill: Customer service charge

Seasonal bill: \$163.56 plus energy charges for metered hours or cabin use on a seasonal basis.

* Due to the expansion of Daylight Saving Time, the on-peak time periods will begin and end one hour later for the period between the second Sunday in March and the first Sunday in April, and for the period between the last Sunday in October and the first Sunday in November.

All customers are subject to additional charges/credits as set forth in Rocky Mountain Power's retail tariffs approved by the Idaho Public Utilities Commission including Adjustment Schedule 191.

Rates are in effect December 2009 and are subject to change by commission order.

These rate tables do not include specific pricing information for Schedules 9, 11, 12, 19, 24 or 35/35A since relatively few customers are billed this way. However, the schedules are available by calling toll free at 1-888-221-7070 or on our Web site at rockymountainpower.net/rates.

Complaints and disputes

We will promptly investigate every complaint or dispute we receive, and we'll report to you on the results. Contact us through our toll-free phone number at 1-888-221-7070. This number is also printed on your bill. If you're not satisfied with the assistance you received from the first person you talked to at Rocky Mountain Power, you have the right to request that your problem be handled by that person's supervisor, and we'll give you the supervisor's name and how he or she can be reached.

Rocky Mountain Power
 Customer Service Center
 toll free: 1-888-221-7070

Price Information

Schedule 7A - Security Area Lighting

	Initial lumens	Watts	Rate per lamp
Mercury vapor lamps	7,000	175	\$26.40
	20,000	400	\$47.09
Sodium vapor lamps	5,600	70	\$16.77 w/support pole \$13.34 lamp only
	9,500	100	\$19.20 w/support pole \$15.77 lamp only
	16,000	150	\$25.29 w/support pole \$22.52 lamp only
Sodium vapor flood lamps	27,500	250	\$36.37 w/support pole \$32.94 lamp only
	50,000	400	\$50.84 w/support pole \$45.00 lamp only
	16,000	150	\$25.29 w/support pole \$22.52 lamp only
Low pressure sodium vapor lamps (energy only)	27,500	250	\$36.37 w/support pole \$32.94 lamp only
	50,000	400	\$50.84 w/support pole \$45.00 lamp only
	8,000	55	\$3.60 per lamp
	13,500	90	\$5.32 per lamp
	22,500	135	\$7.40 per lamp
	33,000	180	\$9.01 per lamp

Explanation of terms:

Customer service charge: A fee charged that helps pay for the costs of providing service.

Kilowatt-hour (kwh): A measure of electrical energy equal to the amount of energy used by a 100-watt light bulb for ten hours or one 1,000-watt hair dryer for one hour.

Customer Service Guarantees

When we say we're going to give you a certain level of service, we mean it. Our seven Customer Service Guarantees cover service issues such as restoring and switching on power, keeping appointments, responding to billing inquiries, resolving meter problems and notifying of planned interruptions. If, for some reason, we can't live up to a commitment, we'll pay you. To find out more about our Customer Service Guarantees, please call toll free at 1-888-221-7070 or visit rockymountainpower.net/guarantees.

Case No. PAC-E-10-07
Exhibit No. 77
Witness: Barbara A. Coughlin

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Rebuttal Testimony of Barbara A. Coughlin

Disconnect Notice

November 2010

Today's date: _____ Time: _____

Meter #: _____

Address: _____

Our employee was here today. Employee #: _____

- Your electric service was connected today. Please:**
 - Check breakers Check fuses Other
- We are unable to connect your electric service.***
- Your electric service was disconnected today* because:**
 - Past due No applicant Hazardous condition
 - No access Other
- Your electric service will be disconnected* for non pay:**
 - Next day 24 hours 48 hoursTo prevent interruption of your electrical service your payment is required immediately.
- Your electric meter was replaced today.**
- In response to your service call,**
 - the service wires are properly insulated. There is no problem.
 - we have scheduled a replacement of your electric service.
 - your equipment on site is damaged or out of place. It must be repaired or replaced before electric service can be restored.
 - the proper inspection agency (city or county) has not approved wiring for electric service.
- We were here, and missed you for our scheduled appointment.**
- Comments**

**Please contact us toll free at 1-888-221-7070 (Español 1-888-225-2611) so we can arrange to receive payment/restore service. It is our goal to turn the power on within 24 hours after all required charges, including fees and/or deposit, have been paid.*

If you have any problems or questions, please call our 24-hour customer service line toll free at **1-888-221-7070**.

Asistencia en ESPAÑOL, 1-888-225-2611, Lunes - Viernes, 8 a.m. to 7 p.m. MT.

Today's date: _____ Time: _____

Meter #: _____

Address: _____

Our employee was here today. Employee #: _____

- Your electric service was connected today. Please:**
 - Check breakers Check fuses Other
- We are unable to connect your electric service.***
- Your electric service was disconnected today* because:**
 - Past due No applicant Hazardous condition
 - No access Other
- Your electric service will be disconnected* for non pay:**
 - Next day 24 hours 48 hoursTo prevent interruption of your electrical service your payment is required immediately.
- Your electric meter was replaced today.**
- In response to your service call,**
 - the service wires are properly insulated. There is no problem.
 - we have scheduled a replacement of your electric service.
 - your equipment on site is damaged or out of place. It must be repaired or replaced before electric service can be restored.
 - the proper inspection agency (city or county) has not approved wiring for electric service.
- We were here, and missed you for our scheduled appointment.**
- Comments**

**Please contact us toll free at 1-888-221-7070 (Español 1-888-225-2611) so we can arrange to receive payment/restore service. It is our goal to turn the power on within 24 hours after all required charges, including fees and/or deposit, have been paid.*

If you have any problems or questions, please call our 24-hour customer service line toll free at **1-888-221-7070**.

Asistencia en ESPAÑOL, 1-888-225-2611, Lunes - Viernes, 8 a.m. to 7 p.m. MT.



The following information is for residential customers only.

In accordance with the rules and regulations of the Idaho Public Utilities Commission, Rocky Mountain Power can disconnect service for non-payment during the winter months of Dec., Jan. and Feb. with restrictions. Customers may qualify for a winter moratorium on disconnection of service for non-payment of their account.

Contact Rocky Mountain Power toll free at 1-888-221-7070 if you meet one of the following qualifications for the winter moratorium: A child 18 years old or younger living with a parent or guardian, an elderly person that is 62 years of age or older, or a person whose physical health or safety would be seriously impaired by termination of service.

Bill payment assistance may be available
Low-Income Home Energy Assistance Program (LIHEAP) and Lend-A-Hand funds help households with incomes that are no greater than the amounts listed below:

Household size	Maximum monthly income
1	\$1,575
2	\$2,059
3	\$2,544
4	\$3,028
5	\$3,513
6	\$3,997

If you believe you may qualify, call the agency managing energy assistance funds in your county and mention you received a Rocky Mountain Power notice on your door.

SouthEastern Idaho Community Action Agency
Bannock County, Bear Lake County, Bingham County, Caribou County, Franklin County, Oneida County and Power County 232-1114

Eastern Idaho Community Action Partnership
Bonneville County, Butte County, Clark County, Fremont County, Jefferson County, Lemhi County, Madison County and Teton County
522-5391 or toll free at 1-800-632-4813

Assistance is dependent on the availability of funds.



The following information is for residential customers only.

In accordance with the rules and regulations of the Idaho Public Utilities Commission, Rocky Mountain Power can disconnect service for non-payment during the winter months of Dec., Jan. and Feb. with restrictions. Customers may qualify for a winter moratorium on disconnection of service for non-payment of their account.

Contact Rocky Mountain Power toll free at 1-888-221-7070 if you meet one of the following qualifications for the winter moratorium: A child 18 years old or younger living with a parent or guardian, an elderly person that is 62 years of age or older, or a person whose physical health or safety would be seriously impaired by termination of service.

Bill payment assistance may be available
Low-Income Home Energy Assistance Program (LIHEAP) and Lend-A-Hand funds help households with incomes that are no greater than the amounts listed below:

Household size	Maximum monthly income
1	\$1,575
2	\$2,059
3	\$2,544
4	\$3,028
5	\$3,513
6	\$3,997

If you believe you may qualify, call the agency managing energy assistance funds in your county and mention you received a Rocky Mountain Power notice on your door.

SouthEastern Idaho Community Action Agency
Bannock County, Bear Lake County, Bingham County, Caribou County, Franklin County, Oneida County and Power County 232-1114

Eastern Idaho Community Action Partnership
Bonneville County, Butte County, Clark County, Fremont County, Jefferson County, Lemhi County, Madison County and Teton County
522-5391 or toll free at 1-800-632-4813

Assistance is dependent on the availability of funds.

