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IDAHO PUBLIC
UTILITIES COMMISSION

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF INTERMOUNTAIN GAS COMPANY FOR AUTHORITY TO INCREASE ITS RATES FOR SERVICE	**CASE NO. INT-G-03-1** **COMMENTS OF THE COMMISSION STAFF**

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, John R. Hammond, Deputy Attorney General, and in response to the Notice of Application, Notice of Public Workshops and Hearings, Notice of Modified Procedure and Notice of Comment Deadline issued in Order No. 29242 on May 14, 2003, submits the following comments.

On May 7, 2003, Intermountain Gas Company (Intermountain; Company) filed its annual Purchased Gas Cost Adjustment (PGA) Application with the Idaho Public Utilities Commission for authority to place into effect new rate schedules that will result in an overall increase of approximately $61 million (37.76%) in revenues.[1] The Company has requested an effective date of July 1, 2003 for its proposed rate schedules.

[1] The Company supplies natural gas to approximately 200,000 customers in southern Idaho.

STAFF REVIEW AND ANALYSIS

The Company proposes to implement the following permanent adjustments and temporary surcharges to its tariff rates for natural gas service and sales:

Permanent Adjustments:

• Elimination of Surcharges and Credits from INT-G-02-3[2]	$10,163,440
• WACOG Adjustment	$47,034,183

Temporary Surcharges and Credits:

• Fixed Cost Collection Adjustment	$2,217,435
• Uncollected Gas Costs in Account 186	$4,427,982
• Market Segmentation	($2,366,437)
• Miscellaneous Gas Costs & True Ups	($504,575)

The total incremental revenue requested by Intermountain Gas Company during the 2003-2004 PGA period is $60,972,028 or a 37.76% increase. The following tables represent Intermountain Gas' proposed changes in rates per customer class.

Customer Class	Revenue	Proposed Average Increase $/Therm	Proposed Average Increase % Change	Proposed Average Price $/Therm
RS-1 Residential	33,384,066	0.23826	33.44%	0.95075
RS-2 Residential	108,992,880	0.23129	37.90%	0.84164
GS-1 General Service	74,025,514	0.23886	42.49%	0.80100
LV-1 Large Volume*	2,089,088	0.22058	53.91%	0.62976

*T-1 Tariff price plus the Weighted Average Cost of Gas (WACOG) $0.50305 per therm
WACOG = total commodity cost of gas / total purchase therms

Transportation	Revenue	Proposed Average Increase $/Therm	Proposed Average Increase % Change	Proposed Average Price $/Therm
T-1 Transportation	3,338,014	(0.00421)	-4.22%	0.09554
T-2 Transportation	602,291	(0.00024)	-0.89%	0.02672

Intermountain Gas proposes to allocate the change in rates to each of its customer classes in accordance with its Purchased Gas Cost Adjustment tariff and approved cost-of-service

[2] In Case No. INT-G-02-3, the Commission authorized certain surcharges and credits to be recovered from and returned to customers over a period of one year. These surcharges and credits were made up of overcollected gas costs, changes in the fixed cost collection allocations and other miscellaneous gas items.

methodology.[3] Staff agrees that this is the proper methodology to use should the Commission authorize the Company's proposed increase in rates.

1. Staff Audit

Staff has conducted a detailed audit of the Company's gas costs that were incurred during the previous PGA period. All invoices, contracts and other materials that relate to the gas purchased during the prior PGA period were reviewed. Staff has verified that there will be no increase in profit to the Company from this proposed rate increase should the Commission grant the Company's request. At this time, Staff is also conducting a comprehensive financial audit of Intermountain Gas. Based on preliminary figures, the Company had net income of $4.2 million for the year ending September 2002. During the same period, Intermountain earned 5.314% on its common equity.[4]

During the course of the PGA audit, Staff identified several things the Company has done in an attempt to reduce the gas price for customers. First, the Company sold a large portion of its Sumas gas and then purchased a similar quantity of Rockies gas at a lower price. This resulted in significantly reduced purchased gas costs. The Company plans to continue this practice if it results in less-expensive gas for customers.

Second, in 2002, the Company entered into financial transactions to fix the price for a portion of gas purchased for customers. These transactions are used by the Company to protect customers from significant upward swings in the price of gas on the wholesale market. While these transactions ended up costing customers an additional $713,354 over what it would have cost on the spot market, they did provide price stability and reduced risk of market exposure. In addition, Intermountain Gas states it is constantly reviewing and analyzing the forward markets to ascertain when it would be prudent to make other forward purchases as the need or opportunity arises.

Third, Intermountain Gas continues to actively search for opportunities to market its extra pipeline capacity. In this regard, Staff questioned IGI Resource's (IGI) bidding practices last summer.[5] Since that time IGI has consistently either bid out the Company's extra capacity in an

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[3] *See* Case Nos. INT-G-95-1, INT-G-88-2 and U-1034-137.

[4] The Company earned 5.897% for the year ending September 2002 when normalized revenues are considered.

[5] IGI Resources is a wholesale gas marketer that performs gas procurement and management services for Intermountain Gas Company. At one time, IGI was affiliated with Intermountain Gas, but was sold to BP Energy in 2000 by Intermountain's parent company, Intermountain Industries.

appropriate manner or purchased the capacity itself at the highest rate allowed.[6] While the majority of unused transportation capacity is sold for significantly less than the tariff price, the Company is attempting to maximize revenue rather than leave the capacity unused.

Fourth, during the most recent PGA period, IGI issued three requests for proposals to meet Intermountain's short-term gas supply needs. The winning bidder in each case was the least expensive proposal all but once. On that occasion, BP Energy's (BP) proposal was slightly less expensive but Intermountain determined that it would use up too much of its available credit with BP if it accepted the bid. Due to its ongoing relationship with IGI and BP, the Company decided that it might need available credit for unforeseen situations that could arise in the volatile wholesale gas market. Therefore, the contract was issued to the next bidder at a slightly higher price.

Fifth, Intermountain's analysis showed that for the month of March 2002, it would probably be cheaper to sell all of it's gas priced at the first-of-the-month index and repurchase gas on the daily market. This strategy proved effective as prices fell from the first-of-month highs to lower levels.

Sixth, the Company chose not to renew a storage contract for some of its Canadian gas because the supplier wanted a significantly higher price for that storage capacity. After attempting to renegotiate the contract, Intermountain's analysis showed that it would be cheaper to simply purchase the gas during the winter than pay significantly more for storage. Even though this appears to have been the best economic decision at the time, it does not secure the price of gas through the winter. Prices have also increased significantly since the decision was made and it is yet to be seen if the Company will pay less for gas during the winter season than it would have for the storage capacity. The analysis retained by Intermountain for these types of decisions should also include an evaluation of potential financial hedges to fix the price.

Finally, as required by Commission Order No. 29199, (Case No. INT-G-01-1) Intermountain sent a letter notifying IGI that it will terminate its contract for gas management services effective next year. Intermountain has also solicited proposals from several gas

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[6] The Federal Energy Regulatory Commission has capped the maximum price allowed for capacity releases.

marketers to find the most reliable and inexpensive management partner. Staff looks forward to reviewing the proposals and the process Intermountain uses to select a provider.[7]

During its audit, Staff found no inconsistencies or irregularities that would cause it to recommend adjustments to the Company's proposal. However, Staff encourages the Company to continue to use all reasonable transactions and strategies to reduce the price of gas for customers. Based on the foregoing, Staff recommends approval of all the temporary credits and surcharges proposed by the Company including the $4.4 million in uncollected gas costs and the $10.2 million increase due to the removal of the surcharges and credits from the last PGA case.

2. <u>WACOG</u>

Intermountain Gas is requesting an average 38% rate increase. The majority of the request is due to a proposed increase in the weighted average cost of gas (WACOG) to $.50305/therm.[8] This is an increase of $.18305/therm from the current WACOG of $.32/therm.

Staff has reviewed Intermountain's transportation and gas procurement contracts, the Company's gas price forecast, and national market price trends. Unseasonably cold weather in late winter for the eastern half of the United States has resulted in natural gas storage levels that are well below normal. Staff believes the low storage levels are causing an unusual increase in demand during the summer storage-filling season. Demand has also increased due to natural gas fired electric generation used for meeting the summer cooling peak demand. This increase in demand has caused natural gas market prices to increase nationwide.

In addition, the western Canadian and US Rockies natural gas reserves are no longer confined to serve only the Northwest US and Canada. In 2000, the Alliance pipeline opened (See Attachment A). This pipeline allowed the Western Canadian gas-producing fields to serve the larger Midwestern United States natural gas market. In May 2003, a new pipeline began service that doubled the Kern River delivery capability of US Rockies gas into southern California (See Attachment A). Based on these factors Staff believes Idaho customers are now subject to the national gas market that is experiencing significant price increases and market volatility.

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[7] In this Order, the Commission also required Intermountain Gas to "submit a report detailing the qualifications, service offered, and remuneration required by the bidding parties." Order No. 29199 at 6.

[8] The WACOG is the Company's anticipated average purchase price for natural gas over the PGA year July 2003-June 2004.

The Commission could consider a smaller WACOG increase. However, current market estimates exceed the Company's request by approximately 5 cents per therm (See Attachment B). Thus, even at the Company's requested WACOG deferred gas costs could be generated.

Purposely generating deferral balances is not necessarily unreasonable particularly if commodity price are expected to decrease in the next ratemaking cycle. Unfortunately natural gas prices for the 2004-05 PGA cycle are expected to be approximately $.45 per therm. Therefore, the forward price projections provide little opportunity for additional deferral recovery without a rate increase next year. The forward projections also do not take into consideration unknown external events such as colder than normal winters or warmer than normal summers. Should either of these events occur natural gas prices will exceed projections and rate increases will be required even if the proposed WACOG is approved. Therefore, Staff does not recommend a WACOG below that proposed by the Company and believes that Intermountain's requested WACOG is reasonable given the current market circumstances.

Staff recommends approval of the Company's WACOG as requested. Staff also recommends that the Commission require Intermountain to continue to file its quarterly WACOG reports for the current gas year. Staff further recommends that the Commission require Intermountain to also file WACOG reports for the projected 2004-2005 gas year to allow Staff to follow the same data and results the Company should be monitoring.

3. <u>Risk Management and Price Stability</u>

Staff has also completed its review of the Company's Risk Management Committee's minutes and other documented activities. Staff notes that the Company has greatly improved documentation of these activities regarding credit risk and venders' reliability. However, customers' rates clearly remain unprotected from annual market volatility. RS-2 Customers are still being asked for a 38% increase in rates. In fact RS-2 gas costs will go up 57% over the last PGA cycle (See Attachment C).

In the Company's 2002 PGA, the Company requested to keep the WACOG higher than its market forecasts to create a credit deferral for customers within the PGA. In May 2002, the Company presented both a 2002-03 WACOG estimate of $.32/therm and a 2003-04 WACOG estimate of approximately $.35/therm. The Company's 2002-03 WACOG turned out to be a very good estimate. The accuracy was improved considerably by a significant amount of financial hedging that secured the 2002-03 gas prices. Unfortunately for customers, the Company did not secure the forward prices for the 2003-04 WACOG in 2002.

As part of our investigation of the Company's risk management decision making the Staff questioned the Company as to why 2003-04 hedges were not secured. The Company replied "the obligation of the Gas Management Committee is not to project what prices will do nor is it the Committees objective to 'beat' a projected WACOG, but rather to ensure Intermountain's gas supplies are purchased at a prudent price level."[9]

Staff does not disagree with an emphasis on prudent gas purchases, nor does Staff downplay the importance of the improved documentation implemented by the Company. However, Staff believes the Company should add an additional element to its risk management activities that involves consideration for customer rate stability.

While Staff continues to agree with its 2002 comments and the Commission's decision not to artificially increase rates to build customer deferral reserves, it also believes there are other methodologies that could provide a more disciplined approach to minimize price volatility for its gas customers. In this regard, Staff believes the Commission should require Intermountain Gas to file a more formal risk management policy. By not adequately considering and documenting the analysis for financial hedges as part of the risk management practice, or by simply stating that prices are too high with the expectation that prices will come down, the Company is taking a price view. The Company's decision-making process needs to be documented and included as part of its formal policy to assure that decisions are made in a rational and reasonable manner.

Staff recommends that the Commission direct the Company to formalize its risk management policy with special emphasis on managing reliability, price, service quality, credit risk, and customer rate volatility. Staff further recommends that the Commission direct the Company to file this formal written policy within 90 days. Staff anticipates that the formal policy would include trigger points or volatility limits that could be used to make hedging decisions or forward market purchases. Staff also believes that after the initial filing of this formal policy it could easily be incorporated into the Company's biannual Integrated Resource Planning (IRP) process in the future. The IRP provides short and medium term market projections. Thus, it presents a good opportunity to address risk management with respect to anticipated market volatility and short-term market swings.

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[9] Intermountain Gas response to Staff audit requests dated 5/20/03.

4. Long Term Gas Purchases

One area of Staff concern relates to the Company's recent decision not to seek formal proposals for its long-term gas needs.[10] The Company has solicited such proposals for purchases less than a year away, and has a documentation process that explains how the winning bid was chosen. However, for its longer-term gas, the Company has not requested formal proposals and in response to Staff's inquiry stated:

> Today, no long-term producer or supplier who sells to Intermountain is willing to directly negotiate a fixed price." While price has always been, and will continue to be, an important component of any of our contracts with suppliers, the price discovery component of LDC/supplier negotiations has now been supplanted by the collective outlook on future prices with the advent of natural gas being traded on the Nymex and the over the counter derivative markets. Not by coincidence, the Company has found, of recent, that many of our preferred portfolio of producers simply will no longer respond to RFP's as they view the exercise as price discovery only and much prefer direct negotiation with the Company.
>
> In addition to the price component of our supply contracts, Intermountain continues to ensure that our supplies are aligned with secure, reliable, and reputable credit worthy producers and suppliers who the Company is comfortable will always provide firm, uninterrupted gas supply for our core market needs.[11]

Staff has not been able to ascertain the validity or reasonableness of the Company's statement that suppliers will not respond to formal long-term requests for supply because there have been no formal proposals for Staff to review. Staff believes it is reasonable to ask the Company to perform at least the same level of due diligence for long-term contracts as it does when it looks for short-term arrangements. Staff believes that reliability and credit worthiness should be a part of the formal process documentation for long-term as well as short-term contracts. Staff recommends that the Company perform a formal Request for Proposals with closed bids submitted to Intermountain Gas for independent evaluation when searching out new long-term supply and transportation arrangements.

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[10] The contract in question is the first replacement contract for Intermountain's three major natural gas supply contracts that are scheduled to expire in 2003. The current contracts have ten-year terms and were secured through a bidding process.

[11] Company response to Staff Audit Request #3, May 29, 2003.

5. **Demand Side Management**

In years past natural gas demand side management (DSM) was not cost effective. In 2000-2001 natural gas prices approached the point where DSM became cost effective. Prices and rates appear to be at the same point again. Now is the time when the Company's current activities can be most effective. Staff encourages the Company to continue its current programs and its mass media and website activities to promote the efficient use of natural gas. These media activities provide all customers with valuable conservation information and provide individuals with ways to reduce their own monthly energy bills. Staff also recommends that the Company continue to explore new DSM opportunities for its customers.

CONSUMER ANALYSIS

1. **Customer Notice**

When Intermountain Gas filed its Application on May 7, 2003, both the customer notice and press release were included in the filing. Customers were notified of the Application by bill stuffer and had until June 13, 2003 to file comments with the Commission. Staff reviewed the customer notice and press release and determined both complied with the notice requirements of IDAPA 31.21.02.102. The customer notice was mailed with cyclical billings beginning May 7, 2003 and ending June 4, 2003. In addition, Intermountain filed its Application earlier than usual to allow adequate time for customers to receive notice well before the scheduled public hearings and workshops.

2. **Customer Comments and Public Workshops and Hearings**

As of June 11, 2003, the Commission had received 181 written comments from customers. None of those who commented favored the increase. Two of the respondents stated that if such an increase were warranted, only part of the increase should be granted. They further recommended that the Commission review wholesale gas prices in six months and if they have not declined, the Commission could order further rate increases. Three of those commenting said they did not attend the hearings or workshops because they assumed the Company would get the increase regardless of objections by the public. One customer, a farmer, said that $8,600 in additional unbudgeted costs that he would incur as a result of one rate case increase "will cut in a very thin margin, possibly into a loss situation."

The first of three scheduled workshops and hearings were held in Boise at the Idaho Public Utilities Commission office. One Intermountain Gas customer attended the workshop.

No customers testified at the hearing. Additional workshops and hearings were held on June 4, in Idaho Falls and June 5, in Twin Falls. Two customers attended the Idaho Falls workshop. One customer testified at the hearing. In Twin Falls, no customers were in attendance at either the workshop or hearing. Television and newspapers covered all three meetings and hearings.

3. <u>Customer Service</u>

Between the effective date of the last PGA, July 1, 2002 and June 12, 2003, the IPUC Consumer Assistance Staff received 83 complaints and inquiries regarding credit and collection issues of which 81 concerned disconnection of service. This was a significant decrease over the corresponding 2001-2002 time period when Staff received 154 complaints and inquiries regarding credit and collection issues of which 145 concerned disconnection of service.

In the past year, during which time rates declined, there was a substantial decrease in the number of complaints and inquiries related specifically to Intermountain's rates. Since the effective date of the last PGA, 17 complaints or inquiries regarding rates have been received, while during the same time period the previous year there were 52.

The proposed rates, if approved, will increase prices to levels similar to those in effect during the 2001-2002 heating season. Based on its past experience, Staff anticipates complaints and inquiries regarding Intermountain will increase significantly if the Commission approves a substantial rate increase. Similarly, Intermountain will see an increase in the number of customers that contact the Company directly. One reason for increased call volumes is because credit and collection efforts increase as more customers are unable to pay their bills in full. When customers receive notices threatening disconnection of service for nonpayment, they are asked to call into the Company to make payment arrangements. During the 2001-2002 heating season, customers had a difficult time getting through on the Intermountain Gas Customer Service telephone line. After reviewing Intermountain's Service Levels and Abandoned Call data, Staff is concerned about Intermountain's ability to handle an increased volume of incoming telephone traffic that might be expected following another major rate increase.

"Service Level" at Intermountain refers to the percent of the total number of incoming calls that are answered within 30 seconds or less. An established industry standard for utilities is to answer 80% of incoming customer service calls within 20 seconds. However, Staff does not take issue with Intermountain using 30 seconds instead of 20 seconds. During fiscal year 2002, (October 1, 2001 – September 30, 2002) when Intermountain prices were at their highest, the Service Level for the year averaged 39.4%. In fiscal year 2001 (October 1, 2000 – September

30, 2001), the average Service Level was 61.6%. In fiscal year 2000 (October 1, 1999 – September 30, 2000), the Service Level averaged 83.4%. Clearly, Intermountain has been unable to meet its own standard for answering incoming calls as call volume has increased.

Another Consumer Assistance Staff concern is how many customer telephone calls placed to the Company are abandoned per month. "Abandoned Calls" are the number of customers' telephone calls that reach the Company's telephone line, but are not actually connected to a Company representative. Typically, these customers hang up after waiting on hold for longer than he or she deems acceptable. In fiscal year 2002, the average number of phone calls abandoned per month was 3,534. In fiscal year 2001, 1,659 calls were abandoned per month. In fiscal year 2000, the average number of abandoned calls per month was 533. These figures point to a downward trend in Intermountain's ability to answer incoming calls within acceptable time frames when prices trend upward.

Intermountain states it has taken several steps this year that will allow them to handle the additional incoming calls generated as a result of the proposed price increase. Since 2002, three additional full-time Customer Service Representatives have been hired and two full-time, temporary positions were created. Also, three representatives in outlying local offices have been identified as remote agents who can step in and answer calls during peak times if needed. Customers can also communicate with the Company through the Intermountain Web Site at www.intgas.com. Intermountain states their e-mail response time is within 24 hours.

Staff suggests an additional avenue for Intermountain to explore might be to encourage the use of facsimile messages for customers unable to reach Intermountain by telephone during peak times. This method could be employed when call volumes reach unacceptable levels by playing a message while customers are waiting on hold giving them the option of sending a fax. This would be in addition to reminding customers of Intermountain's Web Site where questions and requests may also be sent to the Company.

Intermountain has many mechanisms in place to assist customers in paying bills when they are unable to pay in full. The Level Pay program is by far the most popular budgeting tool used by Intermountain residential customers. It helps nearly 20% of Intermountain's customers spread their payments into 12 equal installments. Of the 20% on Level Pay, 5% are RS-1 customers and 14% are RS-2 customers. In April or May of each year, the Company reviews each customer's Level Pay and adjusts the monthly amount for the next 12 months. This year, anticipating an increase in prices, Intermountain held off adjusting Level Pay amounts. Instead, Intermountain will make the necessary adjustments this year by August to avoid making multiple changes in Level Pay amounts that could cause customer frustration and confusion.

Programs available to customers who have trouble paying their gas bills include LIHEAP (Low Income Home Energy Assistance Program), Project Share, and Project Warmth. Project Share and Project Warmth serve different geographic areas and do not overlap. Customers in dire need are often able to get assistance from two programs: LIHEAP and Project Share or Project Warmth. In some situations, a customer may make a salary slightly higher than the levels needed to qualify for LIHEAP funds. However, these customers still may qualify for Project Share funds or Project Warmth funds because their requirements are more lenient.

Intermountain this year has implemented a new program where customers can sign up to donate funds on a regular basis to a fuel fund. A specified amount will be added automatically to the customer's monthly Intermountain Gas bill. Intermountain sends those funds to Project Share in Southwestern Idaho and Project Warmth in Southeastern Idaho.

During the months of December through February, no electric or gas utility may terminate service or threaten to terminate service to a residential customer who declares that he or she is unable to pay in full for service and whose household includes children (under the age of 18), elderly (age 62 or older), or infirm persons. During the winter protection period, customers are encouraged to make payments or sign-up for a program called the Winter Payment Plan. The Winter Payment Plan is especially appropriate for customers who make too much money to qualify for any of the fuel funds but still have difficulty making ends meet. The Winter Payment Plan offers relief from high winter bills by allowing customers, for up to 5 months (November through March), to pay one-half of the customer's regular Level Pay amount. Upon making the March payment, the customer would be expected to call into the Company and establish a payment plan, usually a regular Level Pay amount, with the balance still owing after the winter months rolled into a new Level Pay amount. Consumer Assistance Staff suggests an additional Level Pay promotion be offered in September of this year. A Level Pay promotion just before the winter would encourage customers to sign-up for Level Pay in the fall and average their projected higher usage winter bills over a longer period of time. Consumer Assistance Staff believes this would help to address approximately one third of the comments from customers on fixed incomes who worried that they could not afford a 38% increase in winter heating costs.

STAFF RECOMMENDATIONS

Based on the foregoing comments, Staff recommends that:

1. The Company's proposed WACOG of $.50305 be approved.
2. The proposed temporary surcharges and credits be approved.
3. The Company seek formal or informal proposals for long-term gas supplies as well as short-term supplies.
4. The Company continue to increase its documentation regarding its purchase and other decisions.
5. Intermountain continue to file its quarterly WACOG reports for the current gas year and also begin filing WACOG projections for the subsequent gas year as well.
6. The Commission direct the Company to formalize its risk management policy with special emphasis on managing reliability, price, service quality, credit risk, and customer rate volatility and file this formalized written policy within 90 days.
7. The Company allow customers to ask questions and seek service through facsimiles as well as over the phone and through the internet.
8. Intermountain perform an additional Level Pay promotion in September to allow customers the opportunity to sign up before the winter heating season. Customers would be encouraged to sign-up for Level Pay in the fall and average their projected higher usage winter bills over a longer period of time.

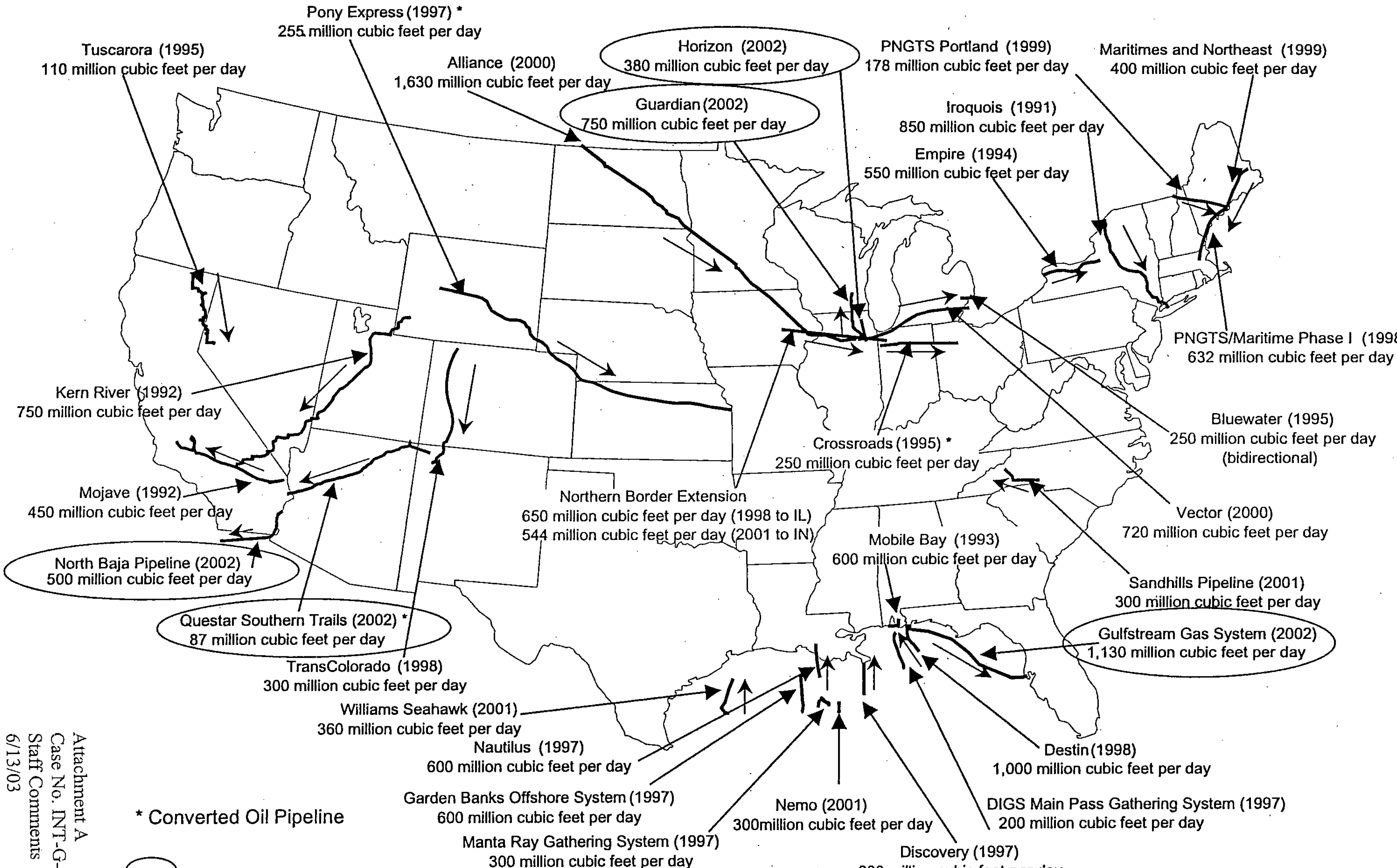
Respectfully submitted this 13th day of June 2003.

John R. Hammond
Deputy Attorney General

Technical Staff: Alden Holm
Michael Fuss
Marilyn Parker

JH:i:/umisc/comments/intg03.1lnahmfussmp

Major New U.S. Natural Gas Pipeline Systems, 1990 - 2002



* Converted Oil Pipeline

= Completed in 2002

= Direction of Flow

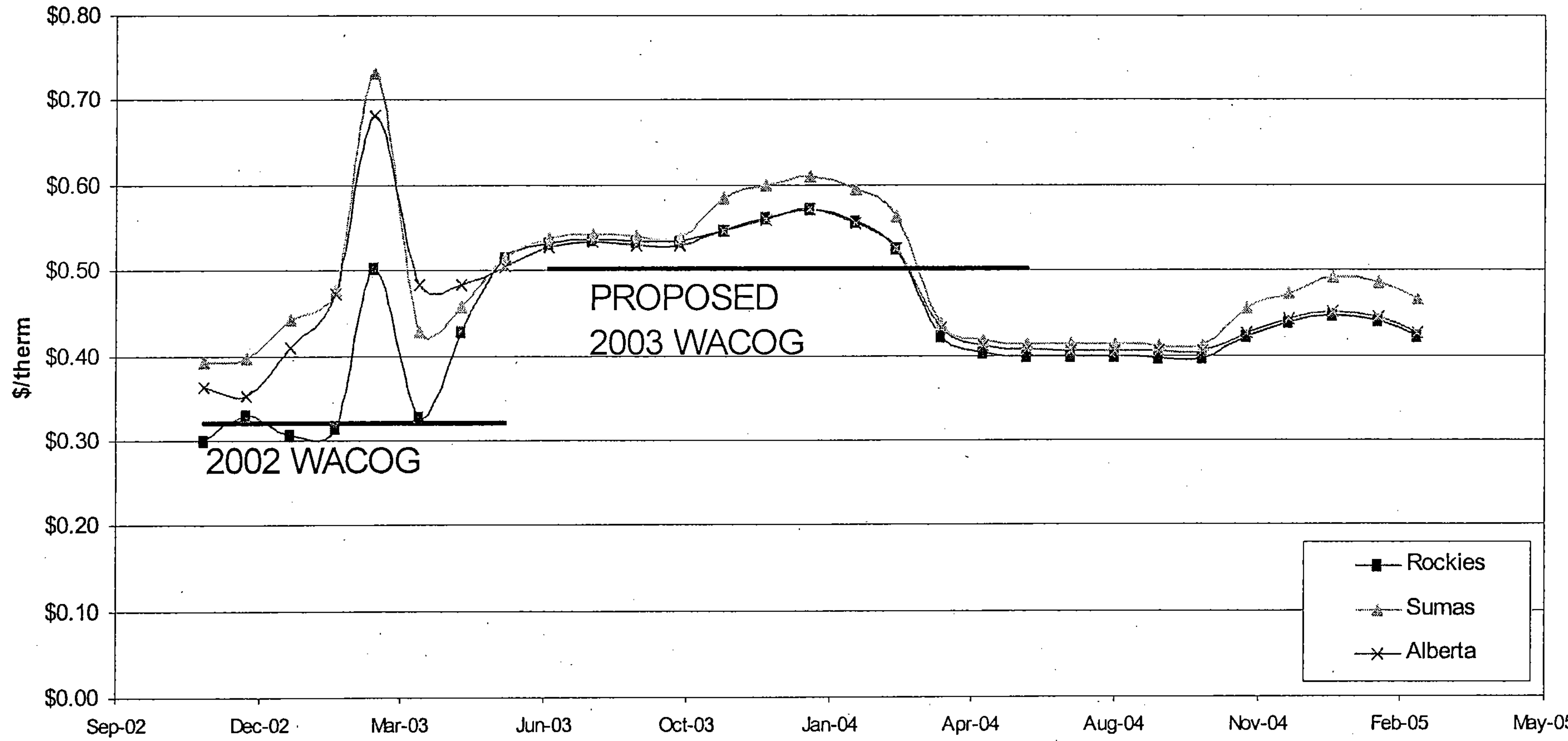
Note: Routes are only approximations.

Source: Energy Information Administration, GasTran Gas Transportation Information System, Natural Gas Pipeline Database

Attachment A
Case No. INT-G-03-1
Staff Comments
6/13/03

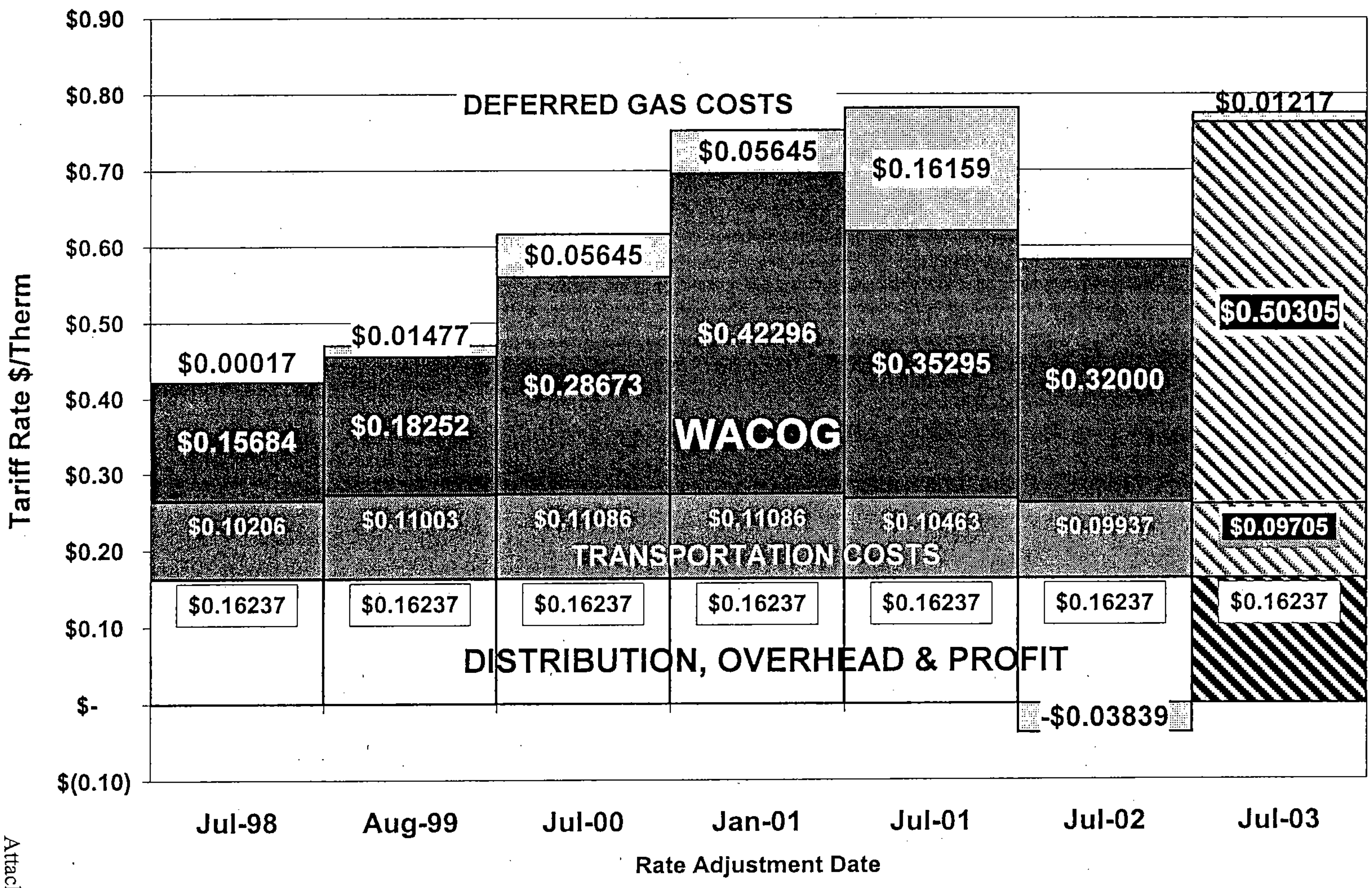
Natural Gas Forward Price Estimates

(NYMEX May 22, 2003)



Attachment B
Case No. INT-G-03-1
Staff Comments
6/13/03

RS-2 Residential Tariff Breakdown



Attachment C
Case No. INT-G-03-1
Staff Comments
6/13/03

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 13TH DAY OF JUNE 2003, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF,** IN CASE NO. INT-G-03-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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