

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

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IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION )  
OF INTERMOUNTAIN GAS COMPANY )  
FOR AUTHORITY TO CHANGE ITS )  
PRICES (2005 PURCHASED GAS COSTS )  
ADJUSTMENT) )  
\_\_\_\_\_ )**

**CASE NO. INT-G-05-2  
COMMENTS OF  
COMMUNITY ACTION  
PARTNERSHIP ASSOCIA-  
TION OF IDAHO**

COMES NOW, the Community Action Partnership Association of Idaho ("CAPAI") and, pursuant to the Commission's Notice of Modified Procedure issued in this case on August 26, 2005, submits the following comments regarding Intermountain Gas Company's ("Intermountain") application.

Intermountain's proposed PGA adjustment will increase its rates by approximately 27%. The magnitude of such an increase is, of course, a concern and onerous financial burden on all of Intermountain's ratepayers. As the level of poverty increases in Idaho, however, it is of particular concern to Intermountain's low-income customers.

According to the Idaho's Department of Commerce, 12% of Idahoans live below the federal poverty guidelines, and 21% live below 150% of the federal poverty guidelines. Of the 104,537 Idahoans living at 150% of federal poverty guidelines or below, 34% live at 50% or below the poverty guidelines. For a family of four: 50% represents an annual income of \$9,675, 100% of poverty represents an annual income \$19,350, and the annual income for 150% of poverty is \$29,025. Already, demand for energy assistance well outpaces availability. In 2004, 29,867 Idaho households were served by the federal program, Low Income Home Energy Assistance, while 104,537 households were eligible. Nationally, Idaho has the fourth highest energy burden according to the Department of Energy. Based on affordability studies conducted by Fisher, Sheehan and Colton, there is

a gap of \$50,470,559 between what Idahoans could afford to pay for energy in 2004 and what they actually had to pay, according to Department of Energy affordability standards.

Given world-wide increases in oil prices, and the attendant increase that results in energy rates, CAPAI respectfully asserts that it is now more critical than ever to take substantive steps toward a deeper analysis and course of action toward addressing poverty in Idaho, and those exacerbating factors, such as increasing utility costs.

CAPAI makes these comments keenly aware that this Commission has recently taken commendable strides toward the aforementioned objectives. Intermountain, though, is unique in that it does *not* have a low-income weatherization program in place.

While the concerns expressed herein might fall outside the scope of this proceeding, CAPAI respectfully proposes that this Commission initiate a separate proceeding for the purpose of assessing Intermountain's attempts to address the needs of its low-income customers, and to determine what authority the Commission does have to ensure that this important objective is accomplished.

RESPECTFULLY SUBMITTED, this 20<sup>th</sup> day of September, 2005.

  
Brad M. Purdy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON SEPTEMBER 20, 2005, I CAUSED TO BE SERVED BY U.S. MAIL, FIRST CLASS, THE FOREGOING COMMENTS OF COMMUNITY ACTION PARTNERSHIP ON THE FOLLOWING:

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