

EXECUTIVE OFFICES

# INTERMOUNTAIN GAS COMPANY

555 SOUTH COLE ROAD • P.O. BOX 7608 • BOISE, IDAHO 83707 • (208) 377-6000 • FAX: 377-6007

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IDAHO PUBLIC  
UTILITIES COMMISSION

July 19, 2006

Jean Jewell  
Idaho Public Utilities Commission  
472 W. Washington St.  
P.O. Box 83720  
Boise, ID 83720-0074

Re: Formal Complaint filed by Ms. Jane Robinson  
IPUC CASE NO. INT-G-06-02

Dear Ms. Jewell:

In response to the Formal Complaint filed by Ms. Jane Robinson Service Dated June 30, 2006 and pursuant to the above referenced Case Number, Intermountain Gas Company respectfully submits its answer in defense of said Complaint.

Sincerely,



Michael P. McGrath  
Director  
Gas Supply and Regulatory Affairs

**MICHAEL P. MCGRATH**  
**INTERMOUNTAIN GAS COMPANY**  
**555 South Cole Road**  
**P.O. Box 7608**  
**Boise, Idaho 83707**  
**(208) 377-6000**  
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**IDAHO PUBLIC**  
**UTILITIES COMMISSION**

**Representative for Intermountain Gas Company**

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>JANE ROBINSON</b>	)	<b>Case No.</b>	<b>INT-G-06-02</b>
	)		
	)	<b>ANSWER OF INTERMOUNTAIN</b>	
<b>Complainant,</b>	)	<b>GAS COMPANY</b>	
	)		
<b>vs.</b>	)		
	)		
	)		
<b>INTERMOUNTAIN GAS COMPANY,</b>	)		
	)		
<b>Respondent.</b>	)		
	)		
	)		
	)		
	)		

Intermountain Gas Company (the "Company" or "Intermountain") hereby respectfully submits its Answer in regards to the above referenced Case Number.

Ms. Jane Robinson is disputing the magnitude of her natural gas usage at her residence located at 10225 Hackamore Drive, Boise, Idaho for the period beginning on December 20, 2005. Ms. Robinson remained current with the payment of her natural gas bills prior to this December Date.

Ms. Robinson harbors a belief that her measured natural gas consumption was in error -especially in light of the fact she had conscientiously and aggressively used her wood burning fireplace during this past winter period.

As part of an earlier effort to resolve Ms. Robinson's natural gas usage concerns, on February 6, 2006 a visual inspection of Ms. Robinson's natural gas meter was performed. This visual inspection concluded that Ms. Robinson's natural gas meter, as well as the accuracy of an earlier Mobile Automated Meter Read, were both within allowable tolerances. As an added precaution, and as requested by a member of the IPUC Staff, on March 8, 2006 Intermountain removed the natural gas meter at Ms. Robinson's residence for testing. The meter was tested and found to be accurate. The replacement meter installed at the residence had earlier been tested for accuracy and was also shown to be accurate.

While Intermountain Gas Company's technicians were on-site to remove Ms. Robinson's meter for testing, they also performed a diagnostic inspection on both her natural gas furnace as well as her natural gas water heater. Inspection protocol required that the equipment be tested under a range of high-to-low thermostat settings. Unfortunately, Ms. Robinson viewed this procedure as requiring an unwarranted use of natural gas. Both her furnace, as well as her water heater, were found to be in good working condition and both met equipment usage specifications. Also as part of Intermountain's equipment inspection, the technician shared with Ms. Robinson his concerns regarding the location of the fireplace in relation to the location of the natural gas thermostat, the fact that all the heating registers and interior doors remained closed and that there was no return heating register co-located with the fireplace. All these factors conspired to lessen the efficiency of not only Ms. Robinson's fireplace but also her natural gas furnace.

As pointed out in Ms. Robinson's Complaint, the index on her replacement meter began at "0492" and Ms. Robinson had a concern that she would be billed for the total volumes shown on the meter to include the beginning units. Replacement meters do not have their index reset to zero but, for billing purposes, the beginning units are documented and used by Intermountain's billing department to represent a zero "0" unit beginning balance.

Intermountain believes that Ms. Robinson's use of a wood fireplace did indeed lower her consumption of natural gas. A review performed on Ms. Robinson's winter usage showed that her natural gas consumption this past winter, on a per Heating Degree Day ("HDD") basis, was actually lower per HDD as compared to previous winters when natural gas was used as the primary heating source.

Intermountain Gas Company apologizes to Ms. Robinson for any disrespect she believes she was shown or any clouded communication she believes she was given while corresponding with the Company on this matter.

Ms Robinson's natural gas bill currently stands at \$916.67. Of this total balance, \$445.69 is for natural gas consumed after the meter change out and equipment inspection performed on March 8<sup>th</sup>.

Wherefore, Intermountain Gas Company respectfully requests that the Complainant, Ms. Jane Robinson, be required to pay the \$916.67 billing deficit presently owed to Intermountain Gas Company. Intermountain requests that the \$445.69 amount representing usage after March 8<sup>th</sup> be due and payable within Ms. Robinson's current billing period. Intermountain would like to make payment arrangements with Ms. Robinson for the balance that would remain owing, or \$470.98, to be paid over the length of time this matter remained in dispute, or approximately seven (7) months. Intermountain requests that the Complaint be dismissed without further action by this Commission.

Dated this 19th day of July, 2006.

Intermountain Gas Company



Michael P. McGrath

Representative for Intermountain Gas Company

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 19th day of July, 2006, I served a copy of the within and foregoing document upon:

Ms. Jane Robinson  
P.O. Box 190356  
Boise, ID 83719

Ms. Jane Robinson  
10225 Hackamore Drive  
Boise, ID 83709

Jean Jewell  
Idaho Public Utilities Commission  
472 W. Washington St.  
P.O. Box 83720  
Boise, ID 83720-0074

Morgan W. Richards  
804 East Pennsylvania Lane  
Boise, ID 83706

By depositing true copies thereof in the United States Mail, postage prepaid, in envelopes addressed to said persons at the above addresses.



Michael P. McGrath  
Director  
Gas Supply and Regulatory Affairs