

EXECUTIVE OFFICES

**INTERMOUNTAIN INDUSTRIES, INC.**

555 SOUTH COLE ROAD • P.O. BOX 7608 • BOISE, IDAHO 83707 • (208) 377-6000 • FAX: 377-6097

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2007 JUL 13 AM 10:30

IDAHO PUBLIC  
UTILITIES COMMISSION

July 13, 2007

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

Re: Formal Complaint filed by Mr. Jim Willson dba Custom Towing and Recovery  
IPUC CASE NO. INT-G-07-02

Dear Ms. Jewell:

In response to the Formal Complaint filed by Mr. Jim Willson dba Custom Towing and Recovery and pursuant to the above referenced Case and Order Number, Intermountain Gas Company respectfully submits an original and seven (7) copies, its answer in defense of said Complaint.

Sincerely,



Terri Shoen  
Director Customer Services

TERRI SHOEN  
INTERMOUNTAIN GAS COMPANY  
555 South Cole Road  
P.O. Box 7608  
Boise, Idaho 83707  
(208) 377-6000  
Fax: (208) 377-6097

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2007 JUL 13 AM 10:31  
IDAHO PUBLIC  
UTILITIES COMMISSION

Representative for Intermountain Gas Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

Mr. Jim Willson	)	Case No.	INT-G-07-02
dba Custom Towing and Recovery	)		
	)	ANSWER OF INTERMOUNTAIN	
	)	GAS COMPANY	
Complainant,	)		
vs.	)		
	)		
INTERMOUNTAIN GAS COMPANY,	)		
	)		
Respondent.	)		
_____	)		

Re: CASE NO. INT-G-07-02

Intermountain Gas Company (the "Company" or "Intermountain") hereby respectfully submits its answer and the following exhibits, in regards to the above referenced case number.

**Exhibit No. 1** - Adjustment Worksheet – Excel worksheet that depicts and calculates the under billing for 36 of the 37 month period.

**Exhibit No. 2** – Adjustment Notification Letter

**Exhibit No. 3** – Copy of Custom Towing and Recovery's December Bill – Total owing of \$2,351.76 includes adjustment of \$2,000.92 representing 36 months under billing and accurate cyclical charges for Dec 15, 2006 – January 16, 2007.

Mr. Jim Willson dba Custom Towing and Recovery is disputing the adjusted billing for \$2,000.92 owed to Intermountain.

Jim Willson dba Custom Towing and Recovery was an Intermountain customer at 1222 Wilson Ave., Pocatello, Idaho, from December 2003 thru February 26, 2007. When the two foot drive gas meter #493033 and ERT (Electronic Remote Transmitter) #0022928479 were set at this property in December 2003, an incorrect meter drive

rate of one foot was programmed into the ERT, causing the ERT to report to the billing system exactly ½ of the natural gas used. This subsequently caused Custom Towing and Recovery to be under billed by a factor of one-half.

This billing error was identified on December 29, 2006, when a service technician was on the property during a routine service call. The billing error covered the time period of December 2003 thru December 2006, a period of 37 months. Intermountain's billing department prepared an adjustment worksheet to calculate the amount owed for the actual therms used by Custom Towing and Recovery (Exhibit 1), which was forwarded to the Pocatello District Manager for discussion with the customer

Intermountain's Pocatello District Manager, Randy Morgan, contacted Mr. Willson on January 11, 2007 concerning the billing error. At that time, Mr. Morgan informed Mr. Willson of the adjusted amount of \$2,000.92, covering 36 of the 37 months. This 36 month time frame is permitted under Idaho Statutes and the IPUC Utility Customer Relations Rule 204. (01) Errors in Preparation – Malfunctions – Failure to Bill (02) Corrections and (03) Refunds and Additional Payments. The offer was extended to Mr. Willson to pay this past due amount in payment arrangements, which covered the 36 month timeframe with no interest.

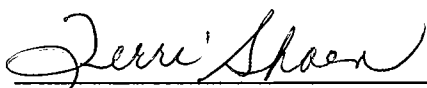
A letter was prepared by the billing department and mailed to Custom Towing and Recovery on January 11, 2007, along with a copy of the adjustment worksheet. (See Exhibits 1 and 2). The adjustment of \$2,000.92 was posted to the customer's account on January 11, 2007. On January 19, 2007, the December bill for Custom Towing and Recovery was generated in the amount of \$2,351.76 and mailed to 1222 Wilson Ave., Pocatello, Idaho. (See Exhibit 3).

While Intermountain understands this adjustment presents an inconvenience for Mr. Willson, treating Mr. Willson's billing error differently than other Intermountain customers, the Company contends, would be discriminatory and preferential. Reference Idaho Code 61-315, Discrimination and Preference Prohibited.

Intermountain requests that the complaint be dismissed and that Mr. Willson be directed to pay the rebilled amount of \$2,000.92 with payment arrangements at his request.

Dated this 13<sup>th</sup> day of July, 2007

Intermountain Gas Company



Terri Shoen  
Representative for Intermountain Gas Company

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 13<sup>th</sup> day of July, 2007, I served a copy of the within and foregoing document upon:

Mr. Jim Willson dba Custom Towing and Recovery  
1220 Wilson Ave.  
Pocatello, ID 83201-4358

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

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

  
\_\_\_\_\_  
Terri Shoen  
Director Customer Services

Custom Towing and Recovery  
10482100

MONTH	AS BILLED						SHOULD HAVE BEEN BILLED					
	CCF	FACTOR	TOTAL THERMS	Rate	Charge	AMOUNT	CCF	FACTOR	TOTAL THERMS	Rate	Charge	AMOUNT
Jan-04	81	0.976	79	79	0.73959	2.09	162	0.976	158	158	0.73959	3.89
				0	0.71913	0				0	0.71913	0
				0	0.71913	0				0	0.71913	0
Feb-04	151	0.982	148	148	0.76079	3.66	302	0.982	297	200	0.76079	7
				0	0.73959	0				97	0.73959	71.74
				0	0.71913	0				0	0.71913	0
				0	0.71913	112.6				0	0.71913	223.9
Mar-04	108	0.959	104	104	0.76079	2.66	216	0.959	207	200	0.76079	5.01
				0	0.73959	0				7	0.73959	5.18
				0	0.71913	0				0	0.71913	0
				0	0.71913	79.12				0	0.71913	167.34
Apr-04	7	0.914	6	6	0.81164	0.21	14	0.914	13	13	0.81164	0.58
				0	0.78991	0				0	0.78991	0
				0	0.76889	0				0	0.76889	0
				0	0.76889	4.87				0	0.76889	10.55
May-04	19	0.91	17	17	0.81164	0.47	38	0.91	35	35	0.81164	0.91
				0	0.78991	0				0	0.78991	0
				0	0.76889	0				0	0.76889	0
				0	0.76889	13.8				0	0.76889	28.41
Jun-04	10	0.898	9	9	0.81164	0.28	20	0.898	18	18	0.81164	0.5
				0	0.78991	0				0	0.78991	0
				0	0.76889	0				0	0.76889	0
				0	0.76889	7.3				0	0.76889	14.61
Jul-04	0	0.882	0	0	rate chng	0.06	0	0.882	0	0	rate chng	0.06
				0	0	0				0	0	0
				0	0	0				0	0	0
Aug-04	0	0.866	0	0	0.89292	0.06	0	0.866	0	0	0.89292	0.06
				0	0.87119	0				0	0.87119	0
				0	0.85017	0				0	0.85017	0
				0	0.85017	2.06				0	0.85017	2.06
Sep-04	0	0.9	0	0	0.89292	0.06	0	0.9	0	0	0.89292	0.06
				0	0.87119	0				0	0.87119	0
				0	0.85017	0				0	0.85017	0
				0	0.85017	2.06				0	0.85017	2.06
Oct-04	25	0.912	23	23	0.89292	0.68	50	0.912	46	46	0.89292	1.29
				0	0.87119	0				0	0.87119	0
				0	0.85017	0				0	0.85017	0
				0	0.85017	23.22				0	0.85017	41.07
Nov-04	71	0.934	66	66	0.89292	1.83	142	0.934	133	133	0.89292	3.62
				0	0.87119	0				0	0.87119	0
				0	0.85017	0				0	0.85017	0
				0	0.85017	62.76				0	0.85017	118.76
Dec-04	230	0.963	221	200	0.84207	5.85	460	0.963	443	200	0.84207	11.32
				21	0.82087	17.24				243	0.82087	199.47
				0	0.80041	0				0	0.80041	0
				0	0.80041	201				0	0.80041	367.88
Jan-05	275	0.975	268	200	0.84207	7.01	550	0.975	536	200	0.84207	13.61
				68	0.82087	55.82				336	0.82087	275.81
				0	0.80041	0				0	0.80041	0
				0	0.80041	240.74				0	0.80041	444.22
Feb-05	155	0.975	151	151	0.84207	4.1	310	0.975	302	200	0.84207	7.85
				0	0.82087	0				102	0.82087	83.73
				0	0.80041	0				0	0.80041	0

Mar-05	93	0.956	89	0.944	127.15	9.50	4.1	140.75	186	0.956	178	178	0.84207	252.14	9.50	7.85	265.49
													0 0.82087	149.89	9.50	4.78	
													0 0.80041	0			
Apr-05	62	0.944	59	0.944	74.94	9.50	2.53	86.97					149.89	9.50	4.78	164.17	
													0 0.85017	0			
													117 0.89292	104.47	2.00	3.19	
													0 0.87119	0			
May-05	26	0.93	24	0.93	52.68	2.00	1.64	56.32	52	0.93	48	48	0.89292	104.47	2.00	1.35	109.66
													0 0.87119	0			
													0 0.85017	0			
													42.86	2.00	1.35	46.21	
Jun-05	2	0.921	2	0.921	21.43	2.00	0.7	24.13	4	0.921	4	4	0.89292	3.57	2.00	0.17	
													0 0.87119	0			
													0 0.85017	0			
													3.57	2.00	0.17	5.74	
Jul-05	0	0.901	0	0.901	1.79	2.00	0.11		0	0.901	0	0	0.89292	0	2.00	0.06	
													0 0.87119	0			
													0 0.85017	0			
													0	2.00	0.06	2.06	
Aug-05	0	0.902	0	0.902	1.79	2.00	0.06		0	0.902	0	0	0.89292	0	2.00	0.06	
													0 0.87119	0			
													0 0.85017	0			
													0	2.00	0.06	2.06	
Sep-05	0	0.91	0	0.91	1.79	2.00	0.06		0	0.91	0	0	0.89292	0	2.00	0.06	
													0 0.87119	0			
													0 0.85017	0			
													0	2.00	0.06	2.06	
Oct-05	5	0.928	5	0.928	5.2	2.00	0.22		10	0.928	9	9	rate chang	9.25	2.00	0.34	
													0 0	0			
													0 0	0			
													0	2.00	0.34	11.59	
Nov-05	25	0.94	24	0.94	27.24	2.00	0.88		50	0.94	47	47	1.13515	53.35	2.00	1.66	
													0 1.11342	0			
													0 1.0924	0			
													53.35	2.00	1.66	57.01	
Dec-05	145	0.995	144	0.995	27.24	2.00	0.88	30.12	290	0.995	289	289	1.0843	216.86	9.50	9.63	
													89 1.0631	94.62			
													0 1.04264	0			
													311.48	9.50	9.63	330.61	
Jan-06	148	0.973	144	0.973	156.14	9.50	4.97	170.61	296	0.973	288	288	1.0843	216.86	9.50	9.6	
													88 1.0631	93.55			
													0 1.04264	0			
													310.41	9.50	9.6	329.51	
Feb-06	145	0.978	142	0.978	153.97	9.50	4.9		290	0.978	284	284	1.0843	216.86	9.50	9.47	
													84 1.0631	89.3			
													0 1.04264	0			
													306.16	9.50	9.47	325.13	
Mar-06	128	0.976	125	0.976	153.97	9.50	4.35		256	0.976	250	250	1.0843	216.86	9.50	8.39	
													50 1.0631	53.16			
													0 1.04264	0			
													270.02	9.50	8.39	287.91	
Apr-06	86	0.947	81	0.947	91.95	2.00	2.82		172	0.947	163	163	1.13515	185.03	2.00	5.61	
													0 1.11342	0			
													0 1.0924	0			
													185.03	2.00	5.61	192.64	
May-06	9	0.927	8	0.927	91.95	2.00	0.33		18	0.927	17	17	1.13515	19.3	2.00	0.64	
													0 1.11342	0			



Custom Towing and Recovery  
1220 Wilson Ave  
Pocatello, ID 83201-4358

January 11, 2007

RE: 1222 Wilson Ave

Dear Customer:

In the process of working a routine service call at the above referenced address, our service technician discovered that the meter's index was programmed improperly. Research of activity at this address reveals that this occurred during the billing month of December 2003. The result of this error is that your meter has been reporting one-half (1/2) the *actual* usage and you have subsequently been being billed for one- half of the actual energy consumed. This error has been corrected at the meter and the usage history on the account has also been corrected to reflect actual energy consumption for the premise.

A charge of \$2,000.92 for the therms you used but were not billed for will appear on your next billing statement. We value you as a customer and apologize for any inconvenience this may cause and are happy to make payment arrangements with you.

Please contact our Customer Service Center at 1-800-548-3679 to make needed payment arrangements or to answer any questions you may have. Thank you in advance for your understanding.

Cordially,

Billing Technician  
Intermountain Gas Company





**INTERMOUNTAIN GAS COMPANY**

P.O. Box 64  
Boise, Idaho 83732  
www.intgas.com

(800) 548-3679

Call 7 AM - 7 PM Mon-Fri

SERVICE ADDRESS: 1222 Wilson Ave, Pocatello, ID 83201-4358

PAYMENT DUE DATE	ACCOUNT NUMBER	PAY THIS AMOUNT
Feb 02, 2007	10482100-001-5	\$2,351.76

Total of Account - Previous Billing	\$130.04
Payments Received	\$130.04 CR
Balance Forward	\$0.00

READING DATES			METER NUMBER	METER READINGS				
FROM	TO	DAYS		FROM	TO	= 100 CU FT X BILLING FACTOR	= THERMS BILLED	
Dec 29	Jan 16	18	493033	0	174	174	0.992	173
Dec 15	Dec 29	14	Exchange	4364	4515	151	0.992	150

BILLING DATE	TYPE OF RATE	CURRENT ACTIVITY	THERMS	X	RATE	=	CHARGE
Jan 19, 2007	GS†						
		Current Usage	200		1.03321		\$206.64
			123		1.01201		\$124.48
		Customer Charge					\$9.50
		Municipal Franchise Fee					\$10.22
		Billing Adjustment					\$2,000.92

AVERAGE THERMS PER DAY	
THIS YEAR	LAST YEAR
10.1	4.4

Total Current Activity	\$2,351.76
Balance Forward	\$0.00
Total of Account - Due Feb 02, 2007	\$2,351.76

Keep your furnace in good operating order. Change or clean filters regularly. Also, don't forget to remove ice and snow from your gas meter.



**INTERMOUNTAIN GAS COMPANY**

P.O. Box 64  
Boise, Idaho 83732  
www.intgas.com

PAYMENT DUE DATE	ACCOUNT NUMBER	PAY THIS AMOUNT
Feb 02, 2007	10482100-001-5	\$2,351.76

104821000010000235176

Custom Towing & Recovery  
Jim Willson  
1220 Wilson Ave  
Pocatello, ID 83201-4358



BALANCE FORWARD	\$0.00
CURRENT CHARGES	\$2,351.76
TOTAL OF ACCOUNT	\$2,351.76
AMOUNT ENCLOSED	