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Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE APPLICATION BY )  
AVISTA UTILITIES, INTERMOUNTAIN GAS ) CASE NO. GNR-U-02-1  
AND PACIFICORP TO IMPLEMENT A TWO- )  
YEAR PILOT WINTER PROTECTION )  
PROGRAM THAT ESTABLISHES MINIMUM ) COMMENTS OF THE  
MONTHLY PAYMENTS DURING THE ) COMMISSION STAFF  
WINTER MORATORIUM, AND A WAIVER OF )  
WINTER MORATORIUM RULE 306, IDAPA )  
31.21.01.306. )  
\_\_\_\_\_ )**

**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Lisa D. Nordstrom, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 29145 on October 31, 2002, submits the following comments.

On October 11, 2002, the Commission received a joint Application from Avista Corporation, Intermountain Gas Company and PacifiCorp (Applicants) seeking authorization to implement a two-year pilot "Winter Protection Program" that establishes minimum monthly payments during the winter moratorium period. Since February 2002, the Applicants, Idaho Power, Commission Staff, Department of Health and Welfare, and Community Action agencies sought to address payment arrangement issues that culminated in this joint Application. Given their desire to implement the pilot program prior to this winter's heating season, the Applicants

requested this Application be reviewed under Modified Procedure and be effective December 1, 2002 through November 30, 2004. In Order No. 29145 the Commission issued a Notice regarding the proposed program and solicited comments on the Application. Avista filed a Notice to withdraw from the case on November 20, 2002. Therefore, Staff has limited its comments to addressing the issues raised with respect to Intermountain Gas and PacifiCorp.

### **BACKGROUND**

The Commission has addressed the contentious issue of what restrictions should be placed on utilities with respect to disconnection of service during the winter months in two previous cases, which are summarized in Attachment A. Although the Commission first articulated its policy on winter disconnections in 1978, the final rules did not become effective until 1980. The “winter moratorium,” as it came to be called, restricted disconnection of households with elderly, children or infirm persons who were unable to pay in full for service during the months of December, January and February. The Commission noted that it was possible that “laggards who are capable of paying their utility bills or entering payment arrangements will refuse to do so by holding hostage their minor children, their elderly or their infirm.” Order No. 15344 at 6-7. However, the Commission observed that the length of time during which the potential for this to happen was short. The Commission also allowed energy utilities to charge interest on past due bills to provide additional incentive for customers to pay.

In 1987, the Commission stated its intention to modify its winter moratorium policy with the following four goals in mind: 1) preserve public health and safety by limiting the circumstances under which service may be terminated during winter months; 2) encourage the development of good payment habits by customers; 3) provide relief from impossible financial obligations; and 4) facilitate collection of problem accounts. Ultimately, the Commission decided to retain the existing winter moratorium policy, stating that “the better balance of our four goals is to preserve the basic protections of the current moratorium rules.” General Order No. 177 at 3. To encourage customers to make at least a minimal payment, the Commission required utilities to offer a Winter Payment Plan covering the months of November through March. Although the new plan allowed customers to pay one-half of their level pay amount during these five months, customers were not required to enter into a Winter Payment Plan. A customer who agreed to a plan but failed to pay was still protected from disconnection during the moratorium months of December through February.

For more than two decades, the Commission has encourage customers to pay their bills while at the same time protecting those households with elderly, children and infirm persons from disconnection of service during the winter. Customers who were able to pay but simply took advantage of the moratorium to skip monthly payments were discouraged from doing so with the introduction of a financial penalty (i.e., interest on late payments). The Winter Payment Plan failed to be much of an incentive for payment, however, and very few customers participated. During last year's heating season, only one PacifiCorp customer was enrolled in the Winter Payment Plan. No Intermountain Gas customers participated.

The Commission is once again faced with the question of whether to depart from its long established moratorium policy. The current moratorium policy focuses on the health and safety of residential households that have a self-declared inability to pay in full. The Applicants' proposal focuses on customers' ability to pay and requires some payment to prevent disconnection. Under the proposed pilot program, only residential customers who meet the income criteria of the Low Income Home Energy Assistance Program (LIHEAP) will be eligible to participate. The presence of children, elderly or infirm in households will not be a factor in determining eligibility. Participants will be required to make monthly payments of at least one-half the regular Level Pay amount. LIHEAP benefits will be used to reduce the underlying arrears on accounts and can be used to satisfy customers' monthly payments. Participants who fail to make their monthly payments will be subject to disconnection. Attachments B and C compare the existing moratorium policy with the pilot program proposal.

### **STAFF ANALYSIS**

#### **Eligibility**

Historically, Intermountain Gas asked customers signing up for service for the first time whether they had children or elderly in the home. The accounts of customers who answered affirmatively were coded as moratorium participants at that time. The coding never changed unless the customer contacted the Company for some reason and the Customer Service Representative updated the customer's information at that time. Potentially, a customer whose children had long since moved away from home would still have their account coded as eligible for protection from winter disconnection. For purposes of this discussion, Staff will refer to these customers as "moratorium eligible." The cumulative effect of this practice was that many more customers were treated as moratorium eligible than should have been. Intermountain Gas

states that fifty-one percent (51%) of the Company's residential customers were moratorium eligible. No other Idaho energy utility had a moratorium eligibility rate above 3%.

As of the 2002-2003 heating season, Intermountain Gas will follow the same practice as other Idaho energy utilities and require customers to declare eligibility for the moratorium by notifying the Company if there are elderly, children, or infirm persons in the household from December through February. Customers only need to declare eligibility if they are subject to disconnection during that time frame. Staff anticipates that the number of moratorium eligible customers will be significantly lower during this heating season than it has been in the past. Staff estimates that approximately 6,000 Intermountain Gas customers will be moratorium eligible this heating season, as opposed to the 105,494 customers who were coded as moratorium eligible during the last heating season.

### **Use of LIHEAP Funds**

Out of Intermountain Gas' 105,494 moratorium eligible customers, 2,692 received LIHEAP benefits and 463 received financial assistance from Project Share during the 2001-2002 heating season. Interestingly, 1,282 customers received LIHEAP benefits but were *not* coded as moratorium eligible. Only 2.6% of last year's heating season moratorium eligible customers would be eligible for the proposed pilot program, but the 1,282 LIHEAP customers who were not moratorium eligible would qualify to participate in the pilot program. Although these potential participants may be low-income customers who do not have children, elderly or infirm customers in their households, it is also possible that Intermountain Gas' records do not accurately reflect the status of these customers' households.

In contrast to Intermountain Gas' experience, less than 1% of PacifiCorp's residential customers declared eligibility for the moratorium. Thirty-three (33) moratorium eligible customers received either LIHEAP benefits or financial assistance from Project Share during the 2001-2002 heating season. A much larger number of customers (1,117) received LIHEAP benefits but did *not* declare moratorium eligibility. It is possible that these customers were low-income but did not have elderly, children or infirm in their households. Alternatively, since PacifiCorp requires customers to declare eligibility for the moratorium each year, it may be that these customers would have been eligible for the moratorium but simply did not declare eligibility.

Attachment D shows the relationship of Intermountain Gas and PacifiCorp's customers receiving LIHEAP benefits to the total number of residential customers. As noted earlier, the

number of Intermountain Gas' customers who were moratorium eligible is much higher than what Staff expects it to be in the future. However, it is important to note that 51% of Intermountain Gas' residential customers were moratorium eligible during the 2001-2002 heating season. Only 2% of the Company's residential customers received LIHEAP benefits during that time frame. Under the proposed pilot program, LIHEAP customers are the only customers who will be eligible. Regardless of whether they were truly eligible to participate in the moratorium in the past, customers have come to rely on the safe haven afforded by the current moratorium policy. Staff anticipates that Intermountain's new requirement for customers to declare moratorium eligibility will drastically reduce the number of eligible customers.

Even though less than 1% of PacifiCorp's residential customers were moratorium eligible during the 2001-2002 heating season, 3% of the Company's residential customers received LIHEAP benefits. In other words, more customers would be eligible for the proposed Winter Protection Program than declared eligibility for the existing moratorium.

#### **Payment History and Disconnection**

Of Intermountain Gas' 105,494 moratorium eligible customers, 7,518 (7%) made no payment during December, January or February of the 2001-2002 heating season. This represents an increase from the prior year when only 4% made no payments. The increase in non-payment may be related to the higher rates in effect during the 2001-2002 heating season. When faced with higher than expected bills, customers who are unable to pay in full sometimes make no payment rather than try to pay something towards the amount owing. Of PacifiCorp's 409 moratorium eligible customers, 101 (25%) made no payment during the heating season. This represents a decrease from the prior year when 33% made no payments.

During March, April and May 2002, 5,040 (5%) of Intermountain Gas' moratorium eligible customers were disconnected for non-payment. The cumulative amount owing at the time of disconnection for those three months was approximately \$974,000. Forty-eight percent (48%) of these customers were reconnected within ten days of disconnection, presumably after paying their balance in full or making suitable payment arrangements. Of the 2,616 customers who remained disconnected, 2,182 still had not paid or re-established service 90 days after disconnection. Approximately \$414,000 remains unpaid at this point. This amount represents only 25% of total write-offs for residential customers during this time period.

If service remains disconnected and the customer has not contacted the Company, activated service at another location, or filed bankruptcy within 90 days, the account is "written

off' and turned over to an outside collection agency. Collection agency fees vary, but may be as high as 50% of the amount due. If the customer requests service at some point in the future (e.g., a gas space heating customer wanting service at the beginning of the next heating season), the Company will require payment in full before providing service and thus reduce the net write-off. Depending on what action the collection agency had taken to collect the debt prior to the customer requesting service, the Company may still have to compensate the collection agency for its efforts. Although Intermountain Gas does not have precise figures, it estimates that 70% of customers whose accounts are written off after the heating season ends do not come back on service within the year under the same name and social security number.

From March through May 2002, 6% of PacifiCorp's moratorium eligible customers were disconnected for non-payment. This represented 24 customers that owed \$12,552. Sixty-three percent (63%) were reconnected within ten days. Due to a disparity in data provided by PacifiCorp, it is not clear how many customers remained without service 90 days after disconnection. The above data seems to suggest that residential customers in general fall behind in paying their bills during the heating season. While it is clear that some residential customers fall behind in paying their winter bills, it appears that the main issue is when, rather than whether, customers pay. A significant number of customers are prompted to pay only when their service is disconnected.

To put the moratorium eligible payment performance in perspective, Staff looked at the residential customers payment performance as a whole. Eleven percent (11%) of Intermountain Gas' residential customers and 25% of PacifiCorp's residential customers had a past due balance as of March 1, 2002. A relatively small number of customers were disconnected during the heating season until March 2002. In March, Intermountain Gas disconnected 2,539 residential customers and PacifiCorp disconnected 98. Of the 2,539 disconnected by Intermountain Gas, 2,062 (81%) were moratorium eligible customers. Of the 98 customers disconnected by PacifiCorp, only 6 (6%) were moratorium eligible customers.

The Applicants did not claim that nonpayment of bills by residential customers in general or moratorium eligible customers in particular threatened their financial health. In fact, the gross residential write off ratio (total residential revenue divided by total residential write offs) for Intermountain Gas for 2001 was 1.8%. The ratio for PacifiCorp was 1.2%. However, the Applicants did note that moratorium eligible customers who failed to make payments during the

moratorium period often accumulated large bills that they were ultimately unable to pay before disconnection.

### **Eligibility Criteria**

Staff agrees with the Applicants that the eligibility criteria for the existing moratorium does not provide an objective criteria for distinguishing between those who are truly unable to pay and those who are simply unwilling to pay. Energy utilities advise Staff that those declaring moratorium eligibility typically have children in the household. It is unusual for elderly customers to declare moratorium eligibility. "Infirm" customers typically provide medical certificates pursuant to Rule 308 of the Commission's Utility Customer Relations Rules. Utilities generally do not know whether customers are low-income or have other financial difficulties that make them unable to pay in full.

The proposed pilot program uses income criteria for LIHEAP as a proxy for customers who are unable to pay. Staff believes that this is a reasonable, objective criteria to use, but it automatically excludes from participation a significant number of customers. LIHEAP customers are asked to make monthly payments equal to one-half of their regular level payment amount. This amount is reasonable in theory, but for customers with large arrearages, one-half of Level Pay may still be beyond their means. Failure to make a monthly payment may result in disconnection of service. Under the pilot program, there is no "safety net" for customers who have children or elderly in the household. Likewise, customers whose income exceeds the Federal Poverty Guidelines upon which LIHEAP eligibility is based will not be protected from disconnection. This includes the "working poor", who may earn up to 200% of the Federal Poverty Guidelines. For these customers and others who find themselves facing a financial emergency, payment arrangements are available and probably will meet the needs of customers if the utilities are flexible, and in some cases, willing to accept minimal payments.

### **STAFF RECOMMENDATION**

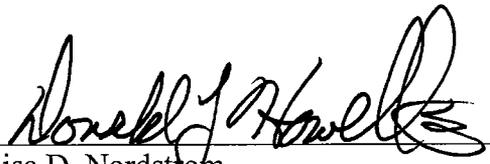
Staff agrees with the Applicants that customers should be encouraged to pay their bills and that those who can pay either in full or in part should be required to pay. However, after reviewing the information available to it, Staff is not convinced that the proposed pilot program is the best approach. In any case, Staff believes it would be premature to implement any pilot program during the 2001-2002 heating season. Time has simply grown too short to educate customers on how the pilot program would work and how they would be affected personally.

The Commission has been contacted by a number of customers who are very concerned about the proposed pilot program and want to know more.

Staff is also concerned about the situation Intermountain Gas finds itself in with respect to its past practices in determining which customers were moratorium eligible. Staff believes it would be prudent for the Company to change its practices this year rather than introduce a totally new program. At the conclusion of the 2001-2002 heating season, the Company will better know which customers are truly moratorium eligible.

Staff agrees with Applicant's that a two-year pilot program is the appropriate time frame for gathering information to aid in evaluation. However, as stated earlier, Staff maintains that it would not be appropriate to implement the proposed pilot program at this time. Staff recommends that all energy utilities be encouraged to gather information during this heating season to aid in development of other alternatives for the Commission to consider next year.

Respectively submitted this 21<sup>st</sup> day of November 2002.

by   
Lisa D. Nordstrom  
Deputy Attorney General

Technical Staff: Beverly Barker

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# HISTORY OF RESTRICTIONS ON WINTER DISCONNECTION

## Case No. P-300-2

Order No. 14123 was issued 08/31/78. It was initiated to consider promulgation of rules and regulations to govern the deposit and termination practices of regulated gas, electric and water utilities. Rules were adopted to be effective 12/01/78. (Rules previously adopted by the Commission on 01/23/78 were stayed on 02/17/78 pending further proceedings.)

Order No. 15025, issued 10/26/79, considered whether the Commission's Deposit and Termination Rules complied with certain federal standards concerning termination of service to customers of gas and electric utilities as set forth in the Public Utility Regulatory Policies Act of 1978 (PURPA). Among the revisions adopted following this review was the first "moratorium" policy:

No gas or electric utility shall terminate service to any customer during the months of December, January or February or at any time at which the temperature is forecast to drop below 32° F before the next business day, without first having made contact, either in person or by telephone, with an adult member of the customer's household and giving and explaining all of the information required to be given in the written notice. During these months or under these temperature conditions, service shall not be terminated unless the utility first contacts the Public Utilities Commission and secures its permission to terminate service. This contact must be made by one of no more than three previously designated employees of the utility whose responsibilities shall include informing the Commission of the utility's intention to terminate service under these circumstances. (Attachment A-2)

This change was to have become effective 11/16/79. Order No. 15084, issued 11/15/79, delayed the effective date of the rules until 12/01/79. Order No. 15133, issued 11/30/79, granted rehearing. Order No. 15344, issued 02/22/80, amended the rules. The amended rules became effective 03/01/80.

Several changes were made pursuant to Order No. 15344, including elimination of the temperature-sensitive provision as well as the requirement to obtain Commission approval prior to termination. Notification requirements were modified so that actual contact with an adult member of the household or the customer's designated third party was sufficient to satisfy the obligation to notify the customer prior to termination. If unable to contact anyone, the utility was required to certify that no children, elderly or infirm were in the household.

Utilities were required to make reasonable payment arrangements, and, for the first time, utilities were authorized to charge interest on unpaid bills. The Commission stated,

In summary, we have adopted the proposal that during the three winter months the service of the customer who agrees to a reasonable payment arrangement cannot be terminated, but have added the additional condition that service cannot be terminated if there are minors, elderly or infirm in the household. This leaves open the possibility that laggards who are capable of paying their utility bills or entering payment arrangements will refuse to do so by holding hostage their minor children, their elderly or their infirm. But the customer's ability to do this is limited: on March 1, the company may pull the plug; furthermore, the company will not be uncompensated from people who can pay—pursuant to this order we will allow the company to charge interest on the bills of delinquent customers. With these two points of leverage the utilities will in most cases be protected in the long run from people who can pay their bills, but refuse to, while the hostages of these laggards—their children, their elderly and their infirm—will be protected in the short-run.” (pp. 6 & 7)

### **Case No. P-300-37**

Order No. 21495, issued 10/07/87, announced a comprehensive review of rules now known as the Customer Relations Rules for gas, electric and water utilities. The Commission stated its intention to modify its moratorium policy, with the following four goals in mind: the preservation of public health and safety by limiting the circumstances under which service may be terminated during winter months; encouraging the development of good payment habits by customers; providing relief from impossible financial obligations; and facilitating collection of problem accounts.

Proposed rule changes included elimination of the “blanket” moratorium, linked protection from disconnection during the months of December through February with participation in a Winter Payment Plan (mandatory payment equal to 1/2 of level pay amount), and partial arrearage forgiveness for customers with past due bill amounts exceeding \$600.

In Order No. 177, issued 03/01/88, the Commission decided not to eliminate the winter moratorium. The Commission found that,

the better balance of our four goals is to preserve the basic protections of the current moratorium rules—that neither gas nor electric service will be terminated during the three winter months in households that contain children, elderly or infirm—and that additional incentives should be given to customers who can maintain partial payment of their bills during the winter.” (p. 3)

The Commission noted that “the moratorium is a safety net, but it has no incentives for the affected customers to pay utility bills during the winter.” (p. 5) A modified version of the originally proposed Winter Payment Plan was adopted to encourage customers to continue paying through the winter. The new Winter Payment Plan covered the months of November through March and allowed customers to pay one half of their level pay amount. Plan participants were obligated to make payment arrangements on the balance owing at the end of

the five months. The original arrearage forgiveness proposal was not adopted. The rule change had an effective date of 07/01/88.

General Order No. 177A, issued 04/27/88, adjusted the terms of eligibility for the Winter Payment Plan by changing the amount of arrears (originally \$150) that could be carried over into the plan to \$75 or the customer's utility bill for the previous 30 days, whichever was greater. General Order No. 177B, issued 06/08/88 clarified how bulk payments such as LIHEAP benefits would be applied to Winter Payment Plans. With this modification, the Winter Payment Plan provisions became effective 07/01/88. There have been no substantive changes to the rules or the Commission's moratorium policy since that time.

## COMPARISON OF EXISTING MORATORIUM POLICY AND PROPOSED PILOT PROGRAM

	<b>Existing Policy</b>	<b>Proposed Pilot Program</b>
<b>Time Period</b>	December through February	December through February
<b>Eligibility</b>	Residential customers with children, elderly or infirm in household <i>and</i> declared inability to pay in full	Low income residential customers who meet LIHEAP eligibility criteria (currently 150% of Federal Poverty Guidelines)
<b>Special Provisions for Children &amp; Elderly</b>	Customers with children or elderly in household cannot be disconnected from December through February	No special provisions
<b>Special Provisions for Medical Problems</b>	Infirm customers cannot be disconnected from December through February	30 day exemption from disconnection if medical certificate received by utility; additional 30 day extension possible
<b>Payment Required</b>	Yes, but no particular amount specified	One-half of Level Pay Amount
<b>Disconnection for Nonpayment</b>	No disconnection of eligible customers from December through February regardless of amount paid or failure to pay	Disconnection for failure to make required payment
<b>Alternative Payment Plans Available</b>	Regular Level Pay Plan or special payment plan tailored to individual circumstances	Regular Level Pay Plan or special payment plan tailored to individual circumstances

## **CURRENT MORATORIUM POLICY AND PROPOSED PILOT CUSTOMER IMPACT**

*Scenario.* On December 1, the customer declares inability to pay and has children under 18 in the household. The customer has a past due balance of \$100. The customer is billed \$75 in December, \$100 in January, and \$125 in February for energy usage. For simplicity, interest charges, which would normally apply, are not included in these examples.

### **Outcomes Under Existing Moratorium – Rule 306**

#### **Example 1**

*Customer eligible for LIHEAP.* The customer makes no payment from personal funds for the months of December through February. The utility receives an Energy Assistance benefit amount of \$250 in January, which is applied to the customer's past due balance of \$275 (\$100 balance carried forward plus \$75 bill for December and \$100 bill for January.) The utility is prohibited from disconnecting the customer's service from December through February. On March 1, the customer has a past due balance of \$150 (\$25 remaining from January bill plus \$125 February bill) and is disconnected. To restore service, the customer must pay the past due balance (or make other acceptable payment arrangements) plus a reconnection fee and a deposit.

#### **Example 2**

*Customer not eligible for LIHEAP.* The customer makes no payment for the months of December through February. The utility is prohibited from disconnecting the customer's service from December through February. On March 1, the customer has a past due balance of \$400 and is disconnected. To restore service, the customer must pay the past due balance (or make other acceptable payment arrangements) plus a reconnection fee and a deposit.

### **Outcomes under proposed Winter Protection Program (WPP)**

#### **Example 3**

*Customer eligible for LIHEAP.* The customer's regular level pay amount (based on estimated annual usage plus the past due balance of \$100 divided into 12 monthly installments) is \$90. The customer's monthly payment amount under the Winter Protection Program for December, January and February is \$45, one-half the regular level payment amount. The customer pays \$45 in December as agreed. The utility receives an Energy Assistance benefit amount of \$250 in January, which is applied to the customer's actual balance of \$230 (\$100 balance carried forward plus \$75 bill for December and \$100 bill for January minus the \$45 payment made in December.)\* A \$20 credit balance remains after applying the LIHEAP benefit amount to the actual balance owing. Because the customer has a credit balance, the customer does not have to make a WPP payment of \$45 in January. In February, the customer makes the \$45 WPP payment, leaving a balance owing of \$60 (\$125 February bill minus \$20 credit balance minus \$45 payment). On or after March 1, the customer must renegotiate payment arrangements. Options available include calculating a new regular level payment amount, making special payment arrangements to pay off the \$60 balance owing over a prescribed length of time, or paying the balance in full and paying future bills as they become due.

\*At the customer's request, the utility may recalculate the monthly payment amount following receipt of a LIHEAP or other "bulk" financial assistance payment.

#### **Example 4**

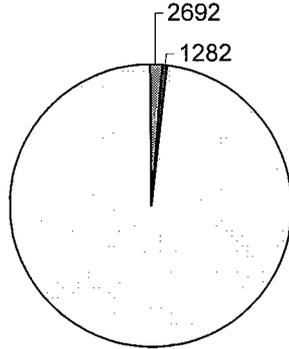
Customer eligible for LIHEAP but fails to make payment. The customer's regular level pay amount (based on estimated annual usage plus the past due balance of \$100 divided into 12 monthly installments) is \$90. The customer's monthly payment amount under the Winter Protection Program for December, January and February is \$45, one-half the regular level payment amount. The customer fails to make the initial \$45 payment in December as agreed and the utility has not yet received Energy Assistance benefit payment on behalf of the customer. The customer fails to respond to 7 day and 24 hour notices from the utility and is disconnected. The customer pays the \$45 owing under the WPP agreement and service is restored. The utility includes the reconnection fee on the January bill. PacifiCorp will request a deposit, payable with the January bill. Intermountain Gas will also request a deposit, but will bill it separately after February. The utility receives an Energy Assistance benefit amount of \$250 in January, which is applied to the customer's actual balance of \$250 (\$100 balance carried forward plus \$75 bill for December, the \$100 bill for January, and a \$20 reconnection fee minus the \$45 payment made in December.) \* In the case of PacifiCorp, the deposit amount would also be carried forward on the customer's account. The customer pays \$45 in February. On or after March 1, the customer must renegotiate payment arrangements. Options available include calculating a new regular level payment amount, making special payment arrangements to pay off the balance owing over a prescribed length of time, or paying the balance of \$80 (\$125 February bill minus \$45 payment) and paying future bills as they become due. In the case of PacifiCorp, the customer would also owe the deposit.

\*At the customer's request, the utility may recalculate the monthly payment amount following receipt of a LIHEAP or other "bulk" financial assistance payment.

#### **Example 5**

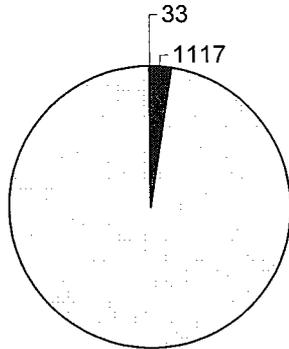
Customer not eligible for LIHEAP. The customer does not qualify for the WPP and must pay bills as they become due. Other payment arrangement options are available. The customer's regular level pay amount (based on estimated annual usage plus the past due balance of \$100 divided into 12 monthly installments) is \$90. Alternatively, the customer may negotiate a special payment arrangement tailored to his or her particular circumstances. The utility may disconnect service if the customer fails to pay bills as they become due or to keep a payment arrangement. If disconnection occurs, the customer must pay the past due balance plus a reconnection fee and a deposit.

**INTGAS 2001-02  
CUSTOMERS RECEIVING LIHEAP**



- Moratorium eligible and receiving LIHEAP: 2692
- Receiving LIHEAP but not Moratorium eligible: 1282
- Total residential customers: 205,246

**PACIFICORP 2001-02  
CUSTOMERS RECEIVING LIHEAP**



- Moratorium eligible and receiving LIHEAP: 33
- Receiving LIHEAP but not Moratorium eligible: 1117
- Total residential customers: 45,269

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 21<sup>ST</sup> DAY OF NOVEMBER 2002, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. GNR-U-02-1, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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