



**IDAHO  
POWER**

An IDACORP Company

IDAHO POWER COMPANY  
P.O. BOX 70  
BOISE, IDAHO 83707

RECEIVED  
FILED



RUL-U-03-03

2003 OCT 22 PM 4:48

IDAHO PUBLIC  
UTILITIES COMMISSION

Monica Moen  
Attorney

October 22, 2003

**Via Hand Delivery**

Jean D. Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
P.O. BOX 83720  
Boise, ID 83720-0074

Re: Docket No. 31-2101-0301  
Proposed Changes to IPUC Utility Customer Relations Rules 005, 104, 107, 109, 205,  
206, 301, 302, 304, 308, 312 and 603  
IDAPA 31.21.01

Dear Ms. Jewell:

Idaho Power Company is in receipt of a copy of the IPUC Customer Relations Staff's proposed changes to IPUC Utility Customer Relations Rules 005, 104, 107, 109, 205, 206, 301, 302, 304, 308, 312 and 603 and provides the following written comments concerning these proposed rules. Idaho Power Company supports the proposed amendments to rules 005, 104, 107, 109, 205, 206, 301, 302, 304 (with the exception of Rule 304(02) as described below), 308, 312 and 603 (with the exception of Rule 603(03) as described below) and encourages the IPUC and the Idaho legislature to adopt these proposed rule changes in their entirety.

With respect to certain proposed amendments to Customer Relations Rules 304 and 603, however, Idaho Power provides the following comments:

**Rules 304(02) and 603(03):** By requesting service to a residence or to an industrial, large commercial or irrigation facility, each of those Idaho Power customers has the ability to receive mail either at the residence, business, farm or at an alternate mailing address identified by the customer. Therefore, use of the written notice has proved to be an effective method of notifying customers of their arrearages and the prospects of termination of services. Idaho Power currently mails a final written notice to every customer subject to termination of services. In addition, the Company attempts to follow up with a phone call to those customers who have not responded to the written notice by either paying the outstanding balances or making arrangements to pay the amounts due and owing.

It is the Company's experience that not every customer either has a telephone or can be reached by telephone. Due to technological advances such as "caller identification," some calls made by the Company to a customer are avoided. Other times the Company does not have current telephone numbers for a

customer or the responsible party cannot be accessed at home or at his/her business or messages cannot be left for the responsible party due to concerns regarding the privacy of customer accounts. Based on these experiences, the Company does not support preclusion of the use of final written notices as an exclusive means of advising customers of the potential termination of electrical services to their premises.

As a result, Idaho Power respectfully proposes, in lieu of the amendments to Rules 304(02) and 603(03) as proposed by the IPUC Staff, that Rule 304(02) and 603(03) be amended to read as follows:

**304. REQUIREMENT FOR NOTICE TO CUSTOMERS BEFORE TERMINATION OF SERVICE (Rule 304).**

**02. ~~Twenty-Four Hour~~ Final Notice.** At least twenty-four (24) hours before ~~actual~~ the proposed date of termination, the utility ~~must~~ shall diligently attempt to contact the customer affected, either in person, ~~or~~ by telephone, or by customer's receipt of a final written notice advising the customer of the proposed action and steps to take to avoid or delay termination. This ~~oral-final~~ notice must shall contain the same information required by Rule 305.

**603. REQUIREMENTS FOR AND CONTENTS OF NOTICE BEFORE TERMINATION OF SERVICE (Rule 603).**

**03. ~~Twenty-Four Hour~~ Final Notice.** At least twenty-four (24) hours prior to ~~actual~~ the proposed date of termination, the utility shall diligently attempt to contact the customer affected, either in person, ~~or~~ by telephone, or by customer's receipt of a final written notice apprising ~~mail a final written notice to apprise~~ the customer of the proposed action. ~~This~~ Oral notices shall contain the same information required above for written notice. Each utility shall maintain clear, written records of ~~these~~ oral notices, showing dates and the utility employee giving the notice.

Thank you, in advance, for your consideration of these matters. If you have any questions, please do not hesitate to contact me at this office.

Yours very truly,

IDAHO POWER COMPANY



Monica B. Moen

MM:jb