



An IDACORP Company

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

RUL-U-04-02

Monica Moen
Attorney

October 26, 2005

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IDAHO PUBLIC
UTILITIES COMMISSION

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 W. Washington Street
P.O. Box 83720
Boise, Idaho 83720-0074

Re: Docket No. 31-2101-0402
Proposed Customer Relations Rules

Dear Ms Jewell:

Enclosed herewith for filing with the Commission are the original and seven (7) copies of Idaho Power Company's Comments regarding the above-described docket.

I would appreciate it if you would return a stamped copy of this transmittal letter for our files.

Yours very truly,

Monica Moen, Attorney
Idaho Power Company

MM/jb
Enclosures

MONICA MOEN, ISB # 5734
Idaho Power Company
1221 West Idaho Street
P. O. Box 70
Boise, Idaho 83707
Telephone: (208) 388-2692
FAX Telephone: (208) 388-6936

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UTILITIES COMMISSION

Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

31.21.01 – CUSTOMER RELATIONS RULES) DOCKET NO. 31-2101-0402
FOR GAS, ELECTRIC AND WATER PUBLIC)
UTILITIES REGULATED BY THE IDAHO) IDAHO POWER COMPANY'S
PUBLIC UTILITIES COMMISSION (THE) COMMENTS
UTILITY CUSTOMER RELATIONS RULES))
_____)

COMES NOW Idaho Power Company ("Company") and hereby submits the following comments regarding the Idaho Public Utilities Commission's ("Commission") proposed changes to the Utility Customer Relations Rules, specifically to Rule 305, Rule 306, Rule 311 and Rule 701.

Rule 305. The Commission's proposed revisions to this rule require gas and electric utilities to provide an explanation of the restrictions on service termination and the availability of the Winter Payment Plan with both oral and written termination notices provided to customers during the months of November, December, January, and February. The Company supports this rule revision but requests the proposed rule be modified to specify that the information need be provided to residential customers only.

The Company recommends the following language for Rule 305.02 (clarifying language in italics):

.02. Additional Requirements for Gas and Electric Utilities.

During the months of November, December, January and February, oral and written notices provided by gas and electric utilities *to residential customers* shall include or be accompanied by an explanation of restrictions on termination of service and the availability of the Winter Payment Plan described in Rule 306.

Rule 306.01 and Rule 306.03. In general, the Company supports extending protection from service termination to residential customers who declare that they are unable to pay in full for utility service and whose household receives financial assistance through the Low Income Home Energy Assistance Program (LIHEAP) during the current program year as proposed by the Commission in revised Rule 306.01 and 306.03. However, the Company believes it would be beneficial to define “the current program year” to ensure a clear understanding of the rule. Consistent with the Commission’s proposed revision to Rule 305.02 requiring utilities to provide customers with information on restrictions on service termination and the Winter Payment Plan during the months of November through February, the Company recommends the “current program year” be defined to coincide with these four months. Accordingly, the Company proposes a new definition be added to Rule 306.02 as follows:

d. "Current Program Year" means the months of November, December, January and February.

Rule 306.06, Rule 306.07, and Rule 306.08. The Company supports the Commission's proposed revisions to Rules 306.06 and 306.07. The Company also supports the proposed addition of Rule 306.08.

Rule 306.09. The Company does not support the addition of this rule. The Commission's Rule 005.02.b currently defines a customer as someone who has received service within the past ten calendar days prior to service termination. The Company believes that it is important to preserve the clear distinction that currently exists between a customer and an applicant. The proposed Rule 306.08 provides adequate protection for continued service for a customer who has declared for moratorium protection and who moves during the months of December, January, or February. The Company supports the added protection afforded customers through Rule 306.08. However, the Company does not believe it is either necessary or prudent to create a new rule that extends to applicants a guarantee of service, regardless of any outstanding balance owed, for up to 20 days beyond the expiration of customer status.

Rule 311. The Company supports the Commission's proposed revisions to Rule 311.01 to specify that service shall not be terminated on any Friday after 12 noon or on

any day immediately preceding any legal holiday and notes that the Company currently does not terminate service on any day immediately preceding any legal holiday.

Rule 701. The Company supports the proposed revisions to Rule 701 as its current practices follow the provisions of the proposed rule changes. The Company would like to note that, although the proposed rule specifies that the Commission will provide Spanish translations for residential customers, the Company currently makes its Summaries for all customer classes available in Spanish.

DATED at Boise, Idaho, this 26th day of October 2005.



MONICA B. MOEN, Attorney for Idaho Power