

**INTERMOUNTAIN GAS COMPANY**

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IDAHO PUBLIC  
UTILITIES COMMISSION

October 26, 2005

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

Re: Intermountain Gas Company  
IPUC Case No. Rul-U-04-2  
APA Docket No. 31-2102-0402

Dear Ms. Jewell:

Intermountain Gas Company was pleased to have the opportunity to participate in workshops and provide input throughout proceedings related to the above referenced Case and Docket number. The process allowed not only input but also open dialogue among the interested parties. For the most part we believe the process resulted in a reasonable set of proposed changes to the IPUC Customer Relations Rules.

However, the purpose of this letter is to draw to your attention several of the proposed Rules changes that Intermountain Gas Company believes to be either unnecessary or unsuitable given the seasonal nature of our business and our concerns regarding fostering responsible customer behaviors. We respectfully request your consideration of the following concerns.

**Rule 306.01** - Expanding the Winter Moratorium to include customers who receive financial assistance through the Low Income Home Energy Assistance Program (LIHEAP).

Intermountain Gas Company recognizes the financial hardship placed on the low-income segment of our customer base during the winter months. However, we have the following concerns about this proposed Rule change:

- It significantly expands the focus of Winter Moratorium away from the health and safety of those with little or no control over their payment status to a much broader program of low-income assistance.
- Any such low-income assistance program should require minimum monthly payments to avoid termination of service in order to build good payment habits and reduce the accumulated financial obligation due at the end of the protection period.

- It does not fulfill the four goals for Winter Moratorium that the Commission articulated in 1987.

**Rule 306.06** – Elimination of the \$75 minimum balance requirement for existing customers and the \$0 minimum balance requirement for applicants to be eligible for the Winter Payment Plan in succeeding years.

Intermountain Gas Company recognizes participation in the Winter Payment Plan can help develop good payment habits and is generally desirable in succeeding years. However, we have the following concerns about this proposed Rule change:

- Due to the already low payment requirements, any balance carried into this Plan would simply compound the customer's financial obligation due at the end of the Plan year.
- A space heating only RS-1 customer could conceivably participate year after year without ever being required to bring their account current.

**Rule 306.09** – New proposed Rule expanding the rights of an applicant with an outstanding balance without regard for the specific circumstances.

Intermountain Gas Company already agreed with the addition of Rule 306.08 to protect moratorium customers who move within a utility's service territory during the months of December, January and February. However, we have the following concerns about this new Rule regarding applicants:

- Proposed Rule 306.08 already addresses the primary concern raised in this Case.
- The proposed thirty (30) day timeframe is excessive. Rule 005.02.b that became effective on March 20, 2004 already protects customer status for ten (10) calendar days following termination of service.
- Throughout the Customer Relations Rules, applicants are clearly expected to pay previous outstanding balances before a utility is required to re-connect service.

**Rule 311.01** – Restricting termination of service after noon on Friday or on any day immediately preceding a legal holiday.

Intermountain Gas Company believes the changes to this rule approved by this Commission as recently as 2003 are sufficient to protect customers from unnecessary inconvenience as evidenced by the following:

- Most banks are open through Saturday at noon.
- Customers have 24-hour access to other sources of funds such as ATMs, credit cards, debit cards, etc.
- IGC staff is available to reconnect service on Friday evenings, throughout the weekend and on holidays.
- No complaints have been received from customers claiming they can not get funding until after the weekend.

Further restricting the Company's time to perform disconnect work would increase the Monday through Thursday workload, impacting service to other customers as evidenced by the following:

- 15% of the weekly disconnect workload is completed on Fridays.
- 25% of the non pay disconnect orders scheduled for Friday are completed between noon and 2 p.m.

Disconnecting service to any customer is an extreme measure that is not taken lightly. Intermountain Gas Company remains sensitive to the impact high winter heating bills can have on our low-income customers. Our customer service representatives diligently work with customers who contact us and are having difficulty paying their bill. We also recognize it is often difficult to differentiate between a customer who is unable to pay their bill from one who is simply unwilling to pay.

It is our understanding that a fundamental premise underlying many of the IPUC Customer Relations Rules is that, over the course of a year, every customer is expected to pay for the gas they consume. Intermountain Gas Company recognizes that the seasonal nature of our business often causes us to view proposed Rules differently than other regulated utilities in Idaho. We ask the Commission to consider the concerns raised in this letter in light of the unique nature of our business, the existing Rules which provide necessary protections for our customers, and the underlying premise of responsible customer behaviors.

Should you have any questions, or if I can be of additional assistance, please do not hesitate to contact me at 377-6075.

Sincerely,



Terri Shoen  
Director Customer Services