

✓ Gen. Ack  
sent 10/26/05

✓ To A.V. ✓ To Commms  
9/14

# Idaho Public Utilities Commission (208) 334-0300 Comment/Inquiry Form

*Submit electronically below or print and return to:*  
**Idaho Public Utilities Commission  
P O Box 83720  
Boise, Idaho 83720-0074  
FAX: (208) 334-3762**

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2005 OCT 26 PM 1:35  
IDAHO PUBLIC  
UTILITIES COMMISSION

*Enclosed please find comments submitted from the Utilities Leadership Team of the Idaho Community Action Network.*

*Please contact Sam Blair at (208) 283-0704 with any questions.*

*Thank you.*



## Idaho Community Action Network

3450 Hill Road • Boise, ID 83703 • (208) 385-9146 • fax (208) 336-0997  
1151 Oakley • Burley, ID 83318 • (208) 678-1708 • fax (208) 678-4113

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Case Number 31-2101-0402

Dear Commissioners:

We are members of the Idaho Community Action Network who have been actively involved in the Rules change process. We have discussed the changes you proposed with members around the State. These are our written comments about the changes you have proposed to make, and the changes you are not proposing, on behalf the organization.

Rule 304:

We proposed requiring the utilities to send out notices 14 days, rather than 7 days, before shutoffs, and requiring the utilities to make two documented attempts to contact the household by phone or in person. The Staff recommended that, instead of amending the rule, ICAN, the utilities, and Staff continue to meet in an informal process to develop rules. ICAN will participate in that informal process, but we believe that it would be better to change the rules. As we testified, the mail system in many parts of Idaho is unreliable, and sending the final notices early will give people a better chance of preventing a shutoff. Many ICAN members have had their power shutoff without ever getting a notice. We think that a rule change, rather than a voluntary agreement that the utilities can walk away from any time, is needed.

Rule 305:

We are very happy to see that the Commission has decided to require gas and electric utilities to add information about the winter moratorium to shutoff notices during the months of November to February. It will help families a great deal if they can find that information there when they are trying to figure out what to do about a shutoff notice.

We urge the Commission to reconsider adding warnings in languages other than English to the shutoff notice. As our members testified at the public hearing, there are many people in Idaho who need that help. It would cost the utilities next to nothing to add that warning to the notices, and it would make a huge difference to the families that need language services. Many of the utilities already add these warnings to shutoff notices they send in Oregon. Immigrants are an important part of our communities across the state, and the utilities should give them the information they need to keep the power on.

Finally, we still believe that the utilities should be required to add the time and day of shutoff to the shutoff notices. We understand that the utilities say that it would cost them too much money to do that. It would make a big difference to families, especially

families that have not gotten shutoff notices in time to collect the money and get it to the utility.

**Rule 306:**

We think that it is a great idea to expand eligibility for the winter moratorium to LIHEAP recipients. That makes the rule much fairer in some ways, because there were many people who did not have kids, seniors, or infirm people in the household but needed the protection of the moratorium. Many people will benefit from this change. There is one way in which the LIHEAP eligibility rules are not fair – they exclude undocumented immigrants. There are many undocumented people who are members of our community, and it is unfair to exclude them from the assistance program and the moratorium. We hope that you will join us in urging the State to change that rule. We also hope you will join us in urging the State to increase funding for the program, as many more people might apply so they can qualify for the moratorium and the LIHEAP program is always underfunded.

We are also glad that you are requiring the utilities to turn the power on at a new house for a moratorium-eligible family that moves during the winter. It would be terrible for a family to be stuck in a bad or dangerous housing situation because it was the only way to keep the heat on.

We are disappointed that you did not expand the moratorium to cover the months of November and March. As our members have testified, these months are as cold as the other winter months, and many people get their power shut off in November.

We also think that you should require the utilities to turn power back on for moratorium eligible families that have had their power shut off before the moratorium begins. If you need the power on, you should have it on – that is the point of the moratorium. Most people work very hard to pay off the bills they build up during the winter. Turning the power off, or leaving it off, “for their own good,” so they can’t build up a huge bill, is not the solution.

**Rule 308:**

We continue to urge the Commission to change the medical certificate exception to allow renewable six- or 12-month certificates. The utilities argued that they are taking care of people without a rule to require them to, but that is not our experience. ICAN member have many stories about having trouble getting their doctors to send certificates every month, and having trouble getting any help from the utilities. We hope that you will reconsider this rule very soon, and we will continue to keep you informed of problems our members have with this rule.

**Rule 311:**

Ending terminations on the days before holidays and Fridays before noon is a great change. Many of our members will have an easier time because of this rule change. We think you could go even further, and end terminations on Fridays, so that working people do not come home on Friday to a cold house and have to pay the extra fee to connect over the weekend or go cold. As our members testified, the notices do not always arrive before the shutoff trucks, and people are still being surprised by shutoffs on Fridays.

**Rule 701:**

The changes to this rule, providing more information in the summaries, and translating them into Spanish, are going to help people a lot. We are very happy to see these changes.

**Rule 702:**

We hope that you will continue to build on the decision to provide rule summaries in Spanish by requiring the utilities to provide more materials in languages other than English.

Sincerely,

Karen McWilliams  
Sharon McWilliams  
Retta Green  
Emily Jones  
Krista Ziebarth  
Jael Byington  
Peggy Byington  
Ron Matthews  
Anna Matthews  
Bob Dye  
Mona Montgomery  
Terri Sterling  
Kathy McNary  
Roxy Carr  
Dennis Hobbs  
Phil Chandnoit

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✓ To Comms FH

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IDAHO PUBLIC UTILITIES COMMISSION

### Comment/Inquiry Form

Case No.	RUL-U-04-02	
Your name		
Address		
City		
State		
ZIP		
Home telephone		
Email Address		
Name of Utility Company	-----	
Add to mailing list for this case	Yes	No

Below, please describe your question or comment briefly.

To Whom It May Concern;  
As you know The winter cold does not end with March. Please extend.

Thank You  
Sandra Smith  
1112 N. Harrison  
Pocatello Id 83204

✓ Gen Ack  
sent 10/24/05

✓ To AU.

✓ To Comments  
11

**Jean Jewell**

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**From:** Ed Howell  
**Sent:** Monday, October 24, 2005 3:34 PM  
**To:** Jean Jewell; Ed Howell; Gene Fadness; Tonya Clark  
**Subject:** Comment acknowledgement

WWW Form Submission:

Monday, October 24, 2005  
2:34:23 PM

Case:  
Name: Dona Burns  
Street\_Address: 4655 Tahoe Pl  
City: Chubuck  
State: ID  
ZIP: 83201  
Home\_Telephone: 208-237-1213  
E-Mail: donamayb52@msn.com  
Company: Idaho Power  
mailing\_list\_yes\_no: yes

Comment\_description: Representing the disadvantaged population, I feel keeping people during the holidays please be allowed to maintain their service. In addition to the Spanish speaking people, I believe their rights are also important.

I wish there were a way to make the process of obtaining a medical certificate for disabled person now having electricity, especially heat and lights during the cold months. Also, I feel it would be logical and humanely justified to allow no utility shut off on Fridays, thus allowing individuals to attend to their utility bills on the following Monday or workday.

Thank you for your time and consideration in this matter.

Transaction ID: 10241434.23  
Referred by: <http://www.puc.state.id.us/scripts/polyform.dll/ipuc>  
User Address: 70.56.201.199  
User Hostname: 70.56.201.199