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IDAHO PUBLIC
UTILITIES COMMISSION



October 23, 2007

Jean Jewell, Commission Secretary
State of Idaho
Idaho Public Utilities Commission
Statehouse
Boise, ID 83720

Re: Comments of Avista Corporation in RUL-U-07-02

Dear Ms. Jewell:

Enclosed for filing are an original and seven (7) copies of Avista's comments regarding "Revision of the Commission's Utility Customer Relations Rules, Docket No. 31-2101-0701."

If you have any questions regarding this filing, please feel free to contact DJ Spooner at (208) 796-1314 or myself at (509) 495-4975.

Sincerely,

A handwritten signature in cursive script that reads "Linda Gervais".

Linda Gervais
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE REVISION)	
FO THE COMMISSION’S UTILITY)	
CUSTOMER RELATIONS RULES)	CASE NO. RUL-U-07-02
IDAPA 31.21.01)	
)	COMMENTS OF AVISTA
)	CORPORATION
_____)	

Avista Corporation (“Avista” or “Company”) hereby submits comments in response to the Idaho Public Utilities Commission’s (“Commission”) proposed changes to the Utility Customer Relations Rules, IDAPA 32.21.01.

The Company appreciates the opportunity to comment on the IPUC Staff’s Decision Memo dated August 9, 2007 regarding the proposed amendments to the Utility Customer Relations Rules. The Company’s comments will focus primarily on Rules 203 and 311.

Rule 105

- *Offers the Customer the option of paying their deposit in two installments* -Avista supports the proposed revisions to Rules 105.01 and 105.2 regarding installation of deposits.

**Rule 203 and
Rule 204**

- *Under and Over billing time frame* – Avista supports the proposed revisions to Rule 203.04 and the proposed addition of Rule 203.01b. Regarding Rule 203.03, Avista believes that, in circumstances where the customer was under-billed should be consistent with the circumstance where the customer was over-billed, and retain the 3 year time frame.

**Rule 300 and
Rule 600**

- *Allows notices to be sent electronically if the customer has opted for electronic billing and consents to electronic notification* - Avista supports the addition of 300.04 that allows a “written notice” be provided by electronic mail if the customer is billed electronically and consents to electronic notification.

**Rule 302 and
Rule 310**

- *Prohibits denial or termination of service for bills four or more years old* – Avista supports this revision as it is consistent with the Company’s current processes.

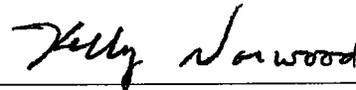
Rule 311

- *Prohibit Disconnections on Fridays or any day preceding a legal holiday* – Avista disagrees with the proposed revisions to Rule 311. The rules currently allow utilities to terminate service on Friday until noon; this allows Avista to utilize its labor resources efficiently. Also, the Company believes that customers have access to agency assistance on Fridays, just as they would on any other day. Customers also have payment options

available 24 hours a day, 7 days a week, including direct checking, debit and credit card by phone and internet. Avista has many pay stations available throughout its service territory. If 311.01a. were to become effective, Avista would support the changes to 311.01b., that provide extending the times when service may be terminated from 4 p.m. to 5 p.m. This additional time will allow the Company to balance its workload.

Respectfully submitted this 23rd day of October 2007.

AVISTA CORPORATION



KELLY NORWOOD

Vice President, State and Federal Regulation