

**INTERMOUNTAIN GAS COMPANY**

555 SOUTH COLE ROAD • P.O. BOX 7608 • BOISE, IDAHO 83707 • (208) 377-6000 • FAX: 377-6097

RECEIVED

2007 OCT 24 PM 3: 33

IDAHO PUBLIC  
UTILITIES COMMISSION

October 24, 2007

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

RUL-0-07-02

Re: Intermountain Gas Company  
IPUC Docket No. 31-2101-0701

Dear Ms. Jewell:

Intermountain Gas Company ("Intermountain") does hereby submit for consideration by this Commission several comments regarding the proposed changes to the IPUC Customer Relations Rules.

Intermountain appreciated the Commission's efforts to establish a Best Practices forum. We believe those meetings are a necessary step in helping to facilitate the Rule change process. Intermountain supports, with comment, many of the proposed changes which were fostered by those meeting sessions. Intermountain believes, however, that several of the proposed changes are inconsistent with the Best Practices general work sessions and we therefore also provide comments on the few specific Rule change proposals that we oppose.

**Rule 105: AMOUNT OF DEPOSIT**

Intermountain supports.

However, Intermountain would like to point out that our experience has shown that for our space heating only RS-1 customers, the existing two (2) highest month bill deposit requirement is insufficient to adequately protect the Company and its customers from the bad debts incurred from this same RS-1 customer class. Intermountain is committed to working with the Commission Staff to formulate solutions to what Intermountain believes to be inadequate RS-1 deposit requirement.

**Rule 203: BILLING UNDER INAPPROPRIATE TARIFF SCHEDULE.**

Intermountain supports.

**Rule 204: INACCURATELY BILLED SERVICE UNDER CORRECT TARIFF SCHEDULE – FAILURE TO BILL FOR SERVICE.**

*Intermountain support, in part, and opposes, in part.*

Intermountain supports the proposed six (6) month time period limitation for under billings. However, Intermountain opposes the requirement that an overcharge be given different (longer) time period calculation parameters than an undercharge. This asymmetric component of the proposed Rule has a built-in unfavorable financial bias to the Company as we view this asymmetry as automatically imposing a financial penalty to the Company.

**Rule 300: FURTHER DEFINITIONS**

*Intermountain supports.*

**Rule 302: GROUNDS FOR DENIAL OR TERMINATION OF SERVICE WITH PRIOR NOTICE.**

*Intermountain opposes the Rule Change of 302.08.*

It appears this change is put in place in an attempt to be aligned with Idaho Code regarding statute of limitations for the collection of outstanding debts. While Idaho Code does provide a time frame for which old debts may no longer be pursued through litigation, there is no provision in the Code to dismiss the debt entirely. Additionally, there is no requirement for the creditor to enter into a new agreement with the debtor while the old debt remains outstanding.

It is unreasonable to expect a utility to expose itself, and ultimately all ratepayers, to additional risk by entering into a credit agreement with a customer that has not satisfied the prior debt that was accumulated with that utility. Furthermore, it could be contended that a customer that is not disputing the legitimacy of the prior debt and enters into a new credit agreement with the utility would be resetting the running of the statutory period.

Intermountain believes that with the exception of debts discharged in bankruptcy, all prior obligations owed by the customer, regardless of the passage of time, should be paid in full prior to establishing new service with the utility. As a result, the Company requests that the proposed changes and additions to Rule 302 and 310 not be adopted and remain in their current form.

**Rule 310: INSUFFICIENT GROUNDS FOR TERMINATION OR DENIAL OF SERVICE.**

Intermountain opposes for the same reasons provided for Rule Change 302.08.

**Rule 311: TIMES WHEN SERVICE MAY BE DENIED OR TERMINATED – OPPORTUNITY TO AVOID TERMINATION OF SERVICE.**

Intermountain opposes the Rule Change of 311.01 and 311.04.

Rule 311.01: Intermountain contests the premise that access to personal financial resources ends on Thursday at 4:00 p.m., and is not available again until Monday. This premise is unsubstantiated in today's society. There are more opportunities for financial resources today than when the Customer Relation Rules were adopted in 1978.

Customer complaints are a key driver in how we approach the day to day work. To our knowledge, we have received no complaints from our customers concerning the lack of access to financial resources on Fridays.

Fifteen percent of the weekly disconnect workload is completed on Fridays and most banks are open through Saturday until noon or later. Customers also have a very broad array of payment options open to them including ATM's and credit card payments available thru our Interactive Voice Response System or directly on line and ACH payment options available on line. We also have 63 pay station locations open to accept payments after 5:00pm, evenings and weekends for the customer's convenience. Each of these various payment options are available over a broad time horizon, many being available 24 hours per day. Staff is available to reconnect the service Friday evenings and throughout the weekend. The customer currently has a minimum of 45 days from receipt of the bill until actual disconnection. At any point during this process, the customer is encouraged to contact Intermountain and make payment arrangements to extend or postpone the disconnection date. Further restricting the Company's time to perform disconnect work will increase the Monday through Thursday workload, significantly delaying service to other customers.

Also, we find including the 2 day notification requirement covered in Rules 301 and 312 with requirements stated in Rule 311 to be unfair. Intermountain currently allows one (1) additional day to the 2 day requirement. Postponing disconnect of service, an additional three days, places an unfair burden on both the previous customer and the company.

*Intermountain opposes the need to provide information concerning the denial of service and restricting times when service may be denied.*

Rule 311.04: We oppose the requirement of providing confidential information to the service technician concerning reasons why service is being denied. This information has already been provided verbally and/or in writing to the applicant as required in Rules 301 and 312. This information is of a confidential nature and we prefer not to release it through the service technician. We also oppose the addition of denial to this rule. Denying service does not change the existing status of the service. Under the proposed change, if the applicant contacted Intermountain on a Friday, any weekday after 5:00 p.m. or on a weekend requesting service be connected or be put into their name and we determined that the applicant had an outstanding amount or first installment of the deposit to be paid, we would be unable to inform the applicant of the service denial. We would have to postpone the denial until the following workday. This rule would cause additional confusion and workload.

**Rule 403: RECORD OF COMPLAINTS.**

*Intermountain supports.*

**Rule 600: DEFINITIONS.**

*Intermountain supports.*

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

cc: Eldon Book  
Mike McGrath  
Paul Powell  
Mike Rich