

M & R FARMS, INC.
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IDAHO PUBLIC
UTILITIES COMMISSION

Idaho Public Utilities Commission
Boise, Idaho

RUL-0-07-02

Re:31.21.01 CUSTOMER RELATIONS RULES
Billing errors, Docket No. 31-2101-0701

We are a customer of Idaho Power and have been since 1990. Our power bills for 2007 are at \$17,000 and we have five (5) accounts.

We strongly support the recommendations of changing the amount of time in which Idaho Power can recover from their billing errors. Frankly, Idaho Power shouldn't be able to recover anything monetarily if the error is due to their negligence and incompetence which we have seen in the very recent past.

There are numerous reasons why we support changing the time period from three years to six months:

7. Idaho Power customers have no control of when or if any part, device, or control is or was actually changed by Idaho Power. Even though there is a notification requirement, Idaho Power routinely ignores the ruling and discounts the ruling as meaningless during settlement negotiations.
8. We have never been contacted by Idaho Power about any changes they have made to our electrical systems. Only when they discover errors do they notify the affected party and sometimes many years have gone by when errors are made, especially those which were due to negligence on their part.
9. In prior years, when errors have occurred, we have never been given the chance to examine, test or otherwise validate whether a meter, current transformer or other part(s) is working properly.
10. We have no control of any billings or accounting methods used to bill by Idaho Power Company. We are never given the 15-minute readings, for example, to ensure that nothing is amiss in our billings, demand charge, or efficiency of our pumps.
11. We believe that current outstanding errors (i.e. errors that have been discovered but are not yet settled and/or paid) within the Idaho Power system should be grandfathered under this ruling. Recent errors discovered in 2006 are significant for some irrigation customers and are causing a significant hardship on them).

12. We also believe that the customer should be able to collect from or send a bill to Idaho Power for their own time and effort in resolving past billing errors. The amount of recovery should include reimbursement of fees spent for attorneys, consultants, accountants and should include reimbursement for time the customers themselves have spent on trying to figure the error, especially if Idaho Power provides them meaningless data that can't be tied to the billing error, as we have seen in the most recent past.

The current policy of allowing Idaho Power to go back three (3) years for billing errors due to machinery failure and due to accounting errors and the like is absolutely ridiculous. No other business in Idaho that we know of has the ability to charge customers for past errors that were made by that business.

In conclusion, we support the change to six (6) months for billing errors and the like made by Idaho Power Company. We are disappointed that the public was not notified of this change as we believe there would be overwhelming support for this rule change.

Sincerely



Michael B. Eckert, President
M & R Farms, Inc.