

EXECUTIVE OFFICES

**INTERMOUNTAIN INDUSTRIES, INC.**

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

71309  
2007 JUN 12 PM 1:26  
INTERMOUNTAIN INDUSTRIES, INC.  
BOISE, IDAHO

June 12, 2007

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

Re: Formal Complaint filed by Tessa Leseberg, on behalf of Ralph W. and Wanda H. Leseberg

IPUC CASE NO. INT-G 07-01

Dear Ms. Jewell:

In response to the Formal Complaint filed by Tessa Leseberg, dated May 22, 2007 and pursuant to the above referenced Case Number, Intermountain Gas Company respectfully submits its answer in defense of said Complaint.

Sincerely,



Terri Shoen  
Director Customer Services

**TERRI SHOEN  
 INTERMOUNTAIN GAS COMPANY  
 555 South Cole Road  
 P.O. Box 7608  
 Boise, Idaho 83707  
 (208) 377-6000  
 Fax: (208) 377-6097**

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 2007 JUN 12 PM 4:26  
 IDAHO PUBLIC  
 UTILITIES COMMISSION

**Representative for Intermountain Gas Company**

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>TESSA LESEBERG,</b>	)	<b>Case No.</b>	<b>INT-G-07-01</b>
<b>on behalf of RALPH W. and WANDA</b>	)		
<b>H. LESEBERG</b>	)	<b>ANSWER OF INTERMOUNTAIN</b>	
	)	<b>GAS COMPANY</b>	
<b>Complainant,</b>	)		
<b>vs.</b>	)		
	)		
<b>INTERMOUNTAIN GAS COMPANY,</b>	)		
	)		
<b>Respondent.</b>	)		
	)		

Intermountain Gas Company (the "Company" or "Intermountain") hereby respectfully submits its Answer in regards to the Complaint filed by Tessa Leseberg, daughter of customers Ralph and Wanda Leseberg.

Ralph and Wanda Leseberg are customers of Intermountain Gas Company and have taken continuous service at 111 E 2<sup>nd</sup> N in St. Anthony, Idaho since September 8, 1999. Meter Number 435735 was set at this property on July 16, 2002. On January 4, 2007, the meter usage appeared on the company's meter read low usage report. Consumption for recent months had fallen below prior historical usage. As a result, a service order was generated on January 16, 2007, requesting the meter be checked by a Company Service Technician. A Company Service Technician was dispatched to the Leseberg's and found the meter was not registering properly, rather than being completely inoperative. The meter was progressively slowing down over a period of time (Exhibit A). Meter was replaced with new Meter Number 488718. Meter Number 435735 was tested in the Company's Meter Shop on April, 2, 2007; a broken wriggler was discovered. The wriggler is the linkage between the meter and the index and its proper operation is critical to the accuracy of the meter (Exhibit B). After setting the new meter, a follow up read was taken on February 1, 2007, by the Automated Meter Reading System. We found that the Lesebergs were using 4.43 CCF of natural gas daily during the period of January 16, 2007 and February 1, 2007, which was 90% higher when compared to the same period of time for the previous year. When comparing to their 2005 usage, 4.43 CCF daily usage was 40% more natural gas during that time period.

As a result, the follow up read demonstrated a considerable increase over historical usage, even when taking differences of weather into consideration. The adjusted estimated usage was created based on actual 2005 historical usage, which we believe was consistent with the Leseberg's typical usage pattern. By using 2005, as a base year, the calculated adjustment weighed in favor of the Leseberg's (Exhibit C and D).

On February 2, 2007, a letter and an adjusted billing were sent to Ralph Leseberg, advising him of the error and a corrected bill showing the adjusted amount of \$496.76 (Exhibits C-E & F). On February 7, 2007, Wanda Leseberg contacted Intermountain requesting to speak to a Supervisor concerning the adjusted statement. The information was taken by the Call Center Representative and forwarded to the Idaho Falls District Manager.

On February 13, 2007, Lynn Davis, Idaho Falls District Manager, contacted Mrs. Leseberg. After discussing the adjustment with her, the account was set up with a \$63.00 level payment. She also agreed to pay an additional \$41.40 per month on the adjusted amount of \$496.76, until the balance was paid in full (Exhibit G and H). Later that day, Tessa Leseberg, daughter of Ralph and Wanda contacted the Idaho Public Utilities Commission Consumer Investigation Department, regarding the adjusted statement. Tammie Estberg received the complaint. Intermountain Gas Company's Credit Manager, Mike Kingery responded to Tammie Estberg's e-mail on February 14, 2007. Mr. Kingery provided the four year history and adjustment calculations (Exhibits C & D). In regards to the Staff's communication of the customer's billing information to the daughter, it appears that the Staff's interpretation of the IPUC Rules of Procedure (Rule 43 01.04) has been waived (Exhibit I #2 and Exhibit M). Mr. Kingery conveyed the fact that we are fairly limited in what we can relay and explain to the daughter regarding payment arrangements without documented permission from the customer or a power of attorney.

On March 13, 2007, Mr. Kingery, advised the staff investigator, Tammie Estberg, that the results of the meter test had not yet been completed. Staff then requested a copy of the meter test results, when available.

On March 28, 2007, Staff advised Intermountain that the customer was filing a formal complaint the following week and needed the test results. April 3, 2007, Intermountain contacted the Staff Investigator with the results of the meter tests. On April 20, 2007, the Staff Investigator faxed the formal complaint, in addition to, two (2) letters that had been prepared by the Staff Investigator. These were responses to the formal complaint, which Intermountain had not seen nor been part of preparation (Exhibit J – Pages 1-14). These letters were incorrect and misled the customer into believing the following:

1. The adjusted billing calculated by Intermountain was incorrect.
2. Intermountain's equipment problem was not a malfunction.
3. The Company may have experienced a broken wriggler when the CT Metering Software was installed (Refer to #3 below, regarding C.T. Metering Software).
4. That a recalculated billing prepared by a Staff Engineer with the Idaho Public Utilities Commission was more accurate than that calculated by the Company.

**Intermountain respectfully submits the following response:**

1. We are in compliance with the Idaho Public Utilities Rule 204.01.02.03 – Inaccurately Billed Service under Correct Tariff Schedule – Failure to Bill for Service. This Rule enables Intermountain to retroactively bill back to the time period that can be reasonably determined (Exhibit K).

2. Given that this situation was a result of a slow meter rather than a broken meter, the length of time to accurately identify the problem was reasonable.
3. The C.T. Metering Software statement was made in error by the Idaho Public Utilities Staff Investigator (e-mail dated May 4, 2007), has no bearing on this case. Intermountain installed the Electronic Remote Transmitter (ERT), during the Company's Automated Meter Reading Project. Staff's assertion that the bent and ultimately broken wriggler installed by the Company during the project, might have created the malfunctioning wriggler is speculative. There is no definitive proof that the wriggler was bent at the time of the project.

Intermountain's adjusted billing calculation included; reviewing the registered usage between January 16, 2007 and February 1, 2007 on the new meter. The daily usage was 90% higher than during the same time period in 2006. The usage was 40% more than the usage had been in the 2005 same time period (Exhibit D). As a result; the adjusted bill was estimated based on the 2005 historical usage. A secondary calculation was created by an Idaho Public Utilities Staff Engineer, using a binomial equation for predictive therms to degree days (Exhibit L). While the Company disagrees with the methodology used to come up with the revised calculation, Intermountain initially agreed to settle on the revised amount of \$415.46, in order to prevent further confusion for the customer. Intermountain has since developed a calculation combining historical usage with the customer's cycle specific heating degree days. This calculation was applied to the Lesebergs' account and resulted in a calculation of \$499.86. The two (2) therm increases over Intermountain's original estimation results in a variance of less than one-half of one percent (Exhibit L).

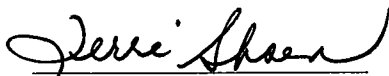
Wherefore, Intermountain Gas Company respectfully requests that the customer, Ralph and Wanda Leseberg, be required to pay the adjusted bill of \$499.86 presently owed to Intermountain Gas Company. Intermountain requests that the \$499.86 amount, representing usage after January 2007, be due and payable within the Leseberg's current billing period.

Intermountain apologizes to Mr. and Mrs. Leseberg for the inconvenience this has caused. Again, we are more than willing to enter into a payment arrangement on the \$499.86, to be paid over the next twelve (12) months.

Intermountain requests that the Complaint be dismissed without further action by this Commission.

Dated this 12<sup>th</sup> day of June, 2007

Intermountain Gas Company



Terri Shoen

Representative for Intermountain Gas Company

CERTIFICATE OF MAILING

I HEARBY CERTIFY that on this twelfth day of June, two thousand and seven, I served a copy of the within and foregoing document upon:

Tessa Leseberg  
111 E 2<sup>nd</sup> N  
Saint Anthony, ID 83445-1517

Ralph and Wanda Leseberg  
111 E 2<sup>nd</sup> N  
Saint Anthony, ID 83445-1517

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

By depositing true copies thereof in the United States Mail, postage prepaid, in envelopes addressed to said persons at the above addresses.

  
\_\_\_\_\_  
Terri Shoen  
Director Customer Services

**Intermountain Gas Company**

**SERVICE ORDER Service Trip**

Customer Service . 1-800-548-3679 . Boise Area 377-6840 . www.intgas.com

Premise Number 3012975      Date To Work 1/16/07      AM/PM \_\_\_\_\_      LL No      Cycle 1      Route 78902      Town St Anthony

Scheduled Activity \_\_\_\_\_ Fee \_\_\_\_\_

Name Leseberg, Ralph W

C/O Name Leseberg, Wanda H      Ordered by 10635

Service Address 111 E 2 N

Contact # \_\_\_\_\_ Home # 208-624-7182      Cell # \_\_\_\_\_ Work # \_\_\_\_\_

Instructions Std Cmp Usage Read Comments: Dead meter

Narrative \_\_\_\_\_

Cross Street / Sub \_\_\_\_\_

Special Directions \_\_\_\_\_

Order	<u>91968740</u>
Taken By	<u>10252 1/16/07 2:09 PM</u>
Meter #	<u>435735</u> ERT # <u>0019448128</u>
Meter Loc	<u>East</u>
Size	<u>AC-250</u> Drive Rate _____
Meter Bill Pres	<u>0.25</u> Cust Del Pres _____
Set Date	<u>7/11/02</u> Last Test _____
Service Line #	<u>642</u> Ext Relief Valve _____
Tamper Count	<u>1</u> Magnetic <u>0</u> Tilt <u>1</u> Date _____
Previous Read	<u>2146</u>

Appliances		
Type	No.	Activity
Central Heat	1	

Rate RS1

GPS Reads:      Latitude 43.96861      Longitude -111.68081

Completed Activity Remove/Replace ERT,Remove/Replace Meter,Relight

Completed By 10635      Date 1/16/07      Arrival Time \_\_\_\_\_      Secure Time \_\_\_\_\_      Departure Time \_\_\_\_\_

ERT Read	_____	Index Read	_____	Drive Rate	_____
ERT Tamper	_____	Magnetic	_____		
Set/Replace Meter #	_____	ERT #	_____	ERT Read	_____
				Index Read	_____
Drive Rate	_____	Ext Relief Valve [ YES / NO / NA ]			
Size	_____	Meter Bill Pres	_____	Cust Del Pres	_____
Pressure Found	_____	Lockup Found	_____	Pressure Left	_____
				Lockup Left	_____
Observed Test Hand	[ YES / NO ]	Movement	[ YES / NO ]		

Tag \_\_\_\_\_ Date \_\_\_\_\_ Appl \_\_\_\_\_ Reason \_\_\_\_\_

Comments \_\_\_\_\_

X

Utility Charge \_\_\_\_\_

Customer Signature \_\_\_\_\_

**INVESTIGATION INFORMATION**

C.O. \_\_\_\_\_ Gas Odor Inside \_\_\_\_\_ Gas Odor Outside \_\_\_\_\_ Line Break \_\_\_\_\_ Structure Fire \_\_\_\_\_

Location Instrument Zeroed: \_\_\_\_\_ Initial Reading: \_\_\_\_\_ % LEL \_\_\_\_\_ % GAS \_\_\_\_\_ ppm C.O.

Source: \_\_\_\_\_

Comments / Actions Taken: \_\_\_\_\_

Results: \_\_\_\_\_

Verification Readings: \_\_\_\_\_ LEL % \_\_\_\_\_ GAS \_\_\_\_\_ ppm C.O.

Meter Spot Test Results: Test Hand Size \_\_\_\_\_ Minutes Observed: \_\_\_\_\_ CFH Usage: \_\_\_\_\_

**INSPECTION INFORMATION (CIRCLE ONE)**

Pressure Test Approved & Tagged: YES / NO @ \_\_\_\_\_ psi Test Witnessed: \_\_\_\_\_

Pipe Size: YES / NO Number of Appliance Outlets: \_\_\_\_\_ Clearances Approved: YES / NO / NA

Pipe Wrapped: YES / NO / NA Pipe Fittings Meet Code: YES / NO Regulators Vented: YES / NO / NA

Venting Per Manufacturer's Instructions: YES / NO Combustion Air: YES / NO

Duct Work Intact: YES / NO Return Air Intact: YES / NO Temporary Heat: YES / NO

Job Approved: YES / NO

Comments / Actions Taken: \_\_\_\_\_

Results: \_\_\_\_\_

(PLEASE PRINT)

**DEFINITIONS**

YES = APPROVED

NO = NOT APPROVED

NA = NOT APPLICABLE

ENTERED BY: \_\_\_\_\_

**Service Order Details.****!!Not for Line Locates!!****Order Number: CW91968740**

CW91968740 Page 1

**MDD Details**

Created: 1/16/2007 2:09:15PM  
 Acknowledged:  
 Assigned: 1/16/2007 2:09:17PM  
 Dispatched: 1/16/2007 2:09:18PM

Enroute: 1/16/2007 2:11:06PM  
 Onsite: 1/16/2007 2:11:10PM  
 Completed: 1/16/2007 2:13:25PM  
 Assigned Tech: 10635 (Bird)

**Premise Information**

Job Code: Service Trip  
 Sub-Type Description:  
 Address: 111 E 2 N  
 Cross Street:  
 City: St Anthony  
 Phone Number:  
 Cell Phone Number:  
 Landlord Agreement: No  
 Premise: 3012975  
 Appointment Time: 1/16/2007 8:00:00AM  
 ERT Number: 0019448128  
 Customer: Leseberg Ralph W  
 Requested By: 10635  
 Map Number:  
 Instructions: Change out dead meter per tech  
 Directions:

Subdivision Name:  
 Service Location:  
 Contact Phone Number: 208-624-7182  
 Work Phone Number: X  
 Route Code: 78902  
 Read Cycle: 1  
 Rate: RS1  
 Meter Number: 435735  
 Co-applicant: Leseberg Wanda H  
 Legal Address:

**Activity Information**

Activity 1: Remove/Replace ERT  
 Activity 2: Remove/Replace Meter  
 Activity 3: Relight  
 Activity 4: //  
 Activity 5: //  
 Service Fee:  
 Final Comments:

Activity 6: //  
 Activity 7: //  
 Activity 8: //  
 Activity 9: //  
 Activity 10: //  
 Taken By: srobinson

**Equipment**

Latitude: 43.9686  
 Meter Location: East  
 Meter Size:  
 Previous Read Value: 2,146  
 Billing Pressure: 0.25  
 Tamper Count: 1  
 Tilt: 1  
 External Relief Valve:  
 Service LineNumber: 642

Longitude: -111.6808  
 Meter Set date: 7/11/02  
 Test Date:  
 Previous Read Date: 1/2/07  
 Delivery Pressure:  
 Tamper Date:  
 Magnetic: 0

**Standard Completion Review**

Waive Fee: N  
 Standard Completion Comments:

After Hours: N

Additional Comments:

**Standard Completion Usage Read Review:**

Usage Read: 2,156  
 Usage Read Comments:  
 Dead meter

Drive Rate Found: 1



**Standard Completion ERT Read Review**

ERT Read: 0  
 ERT Read Completion Comments:  
 Relite space heater.

Drive Rate Found: 1

**Inspection Review**

Pressure Test Approved:  
 Test Witnessed By:  
 Inspection Comments:

Pressure Test PSI:

Pipe Size Correct:  
 Clearances OK:  
 Fittings OK:  
 Venting Per Mfg Instructions:  
 Duct Work Intact:  
 Temporary Heat:

Number of Outlets:  
 Pipe Wrapped:  
 Regulators Vented:  
 Combustion Air:  
 Return Air Intact:  
 Job Approved:

**Collection Review**

Amount Collected:  
 Non Pay Reason:

Payment Method:

**Install ERT Review**

Installed ERT ID: 58,462,649  
 Drive Rate: 1

Install Read: 0

**Install Meter Review**

Installed Meter Number: 488,718  
 Install Usage Read: 0  
 Install Delivery Pressure: 0.25  
 Temp Compensated: N  
 Pressure Found: 7.00  
 Lockup found: 8.00  
 Observed Test Hand: Yes  
 External Relief Valve: No

Installed Meter Size: AC-250  
 Install ERT Drive Rate: 1  
 Install Billing Pressure: 0.25  
 Press Compensated: N  
 Pressure Left: 7.00  
 Lockup Left: 8.00  
 Movement: No

**Investigation Review**

Secure Time: :  
 Gas Odor Inside:  
 Gas Odor Outside:  
 Location Instrument Zerod:  
 Initial Gas Reading:  
 Source:  
 Verification Gas LEL:  
 Meter Spot Test Hand Size:  
 Meter Spot Test Minutes Observed:  
 Investigation Comments:

CO Found:  
 Line Break:  
 Structure Fire:

Initial Gas LEL:  
 Initial CO PPM:  
 Verification CO PPM:  
 Verification Gas Reading:  
 Meter Spot Test CFH Usage:

Investigation Results:

**Remove and Replace Review**

Install Usage Read: 0  
 Delivery Pressure: 0.25  
 Temp Compensated: N

Billing Pressure: 0.25  
 Pressure Compensated: N

**Remove Reason**

Remove Reason Text: Dead meter and ert.  
 Remove Reason Desc: Dead Meter

**ERT Tamper**

Tamper Indicator:  
 Tamper Comments:

Tilt:  
 Magnetic:

**Red Tag Information**

**Equip/Comments**

**Tag Reason**

**Tag Date**

**Clear?**

No

No

No

No

No

**Meter Station Condition Check**

Index Drive:

Relief Set Pressure:

PSI Left:

Repair Code:

**INTERMOUNTAIN GAS COMPANY  
METER SHOP  
SPECIAL TEST REPORT**

Company # 435735 Mfg. # A00136567 Date 04/02/2007  
 Meter Type AC-250 Set Date 07/16/2002 Remove Date 01/16/2007  
 Account # 6725575 Index Read 2037  
 ERT Number 19448128 ERT Read 2156.14  
 Removed For: Dead Removed By: Lewis Bird.

Customer Name \_\_\_\_\_

Customer Address 111 E. 2<sup>nd</sup>. N. St. Anthony Idaho

Prover Room Temp. 71 F Prover Temp. 71 F

Test Data Check Test: 099.4 Open Test: 099.5

Meter Drive Rate: 1 Ft. ERT Drive Rate: 1 Ft.

Tamper Seals: Yes  No

Tested By: Mr. Mark Cirelli Witnessed By: John Atwater

Test Requested By: Mr. Lynn Davis Location: Idaho Falls

Comments: Broken Wiggler. Please Note Meter and ERT Reads.

Retain in Mtr. Shop:  Date: 04/02/2007 Return to District:  Date: \_\_\_\_\_

Copies: Original - Meter Shop Second - Requesting Mgr. / Office Third - Credit Mgr.

Ralph W Leseberg  
53852700

AS BILLED

SHOULD HAVE BEEN BILLED

MONTH	CCF	FACTOR	THERM	Rate	Charge	CC	MFF	AMOUNT	CCF	FACTOR	THERM	RATE	Charge	CC	MFF	AMOUNT
Feb-06	66	0.963	65	1.14245	74.26	6.5	2.42	83.18	91	0.963	88	1.14245	100.54	6.5	3.21	110.25
Mar-06	36	0.978	35	1.14245	39.99	6.5	1.39	47.88	85	0.978	83	1.14245	94.82	6.5	3.04	104.36
Apr-06	10	0.943	9	1.25501	11.3	2.5	0.41	14.21	80	0.943	75	1.25501	94.13	2.5	2.9	99.63
May-06	7	0.821	6	1.25501	7.53	2.5	0.3	10.33	38	0.921	35	1.25501	43.93	2.5	1.39	47.82
Jun-06	5	0.899	4	1.25501	5.02	2.5	0.23	7.75	23	0.899	21	1.25501	26.36	2.5	0.87	29.73
Jul-06	2	0.878	2	1.25501	2.51	2.5	0.15	5.16	13	0.878	11	1.25501	13.81	2.5	0.49	16.8
Aug-06	0	0.865	0	1.25501	0	2.5	0.08	2.68	7	0.865	8	1.25501	7.53	2.5	0.3	10.33
Sep-06	1	0.879	1	1.25501	1.26	2.5	0.11	3.87	9	0.879	8	1.25501	10.04	2.5	0.38	12.92
Oct-06	2	0.907	2	rate chang	2.51	2.5	0.15	5.16	14	0.907	13	rate chang	16.28	2.5	0.56	19.34
Nov-06	6	0.928	6	1.21543	7.29	2.5	0.29	10.00	46	0.928	43	1.21543	52.26	2.5	1.64	56.4
Dec-06	10	0.944	9	1.10287	9.93	6.5	0.49	18.92	77	0.944	73	1.10287	80.51	6.5	2.61	89.62
Jan-07	20	0.969	19	1.10287	20.95	6.5	0.82	28.27	117	0.969	113	1.10287	124.62	6.5	3.93	135.05
	167		158		182.55	46	6.84	235.39	600		569		664.83	46	21.32	732.15

Therms: 411  
Charge: 482.28  
MFF: 14.48  
Total: \$ 496.76

RS1 ICL

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# Exhibit D

Read_Date	Billed_Usage	Metered_Usage	Read_Num	Days_Cnt	Equipment_Id_Code
<b>2/1/2007</b>	<b>71</b>	<b>71</b>	<b>71</b>	<b>16</b>	<b>488718</b>
<b>1/16/2007</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>488718</b>
1/16/2007	62	62	2208	14	435735
1/2/2007	19	20	2146	32	435735
12/1/2006	9	10	2126	30	435735
11/1/2006	6	6	2116	30	435735
10/2/2006	2	2	2110	31	435735
9/1/2006	1	1	2108	31	435735
8/1/2006	0	0	2107	29	435735
7/3/2006	2	2	2107	32	435735
6/1/2006	4	5	2105	31	435735
5/1/2006	6	7	2100	28	435735
4/3/2006	9	10	2093	33	435735
3/1/2006	35	36	2083	28	435735
2/1/2006	65	68	2047	29	435735
1/3/2006	118	121	1979	33	435735
12/1/2005	73	77	1858	30	435735
11/1/2005	41	45	1781	29	435735
10/3/2005	14	15	1736	32	435735
9/1/2005	8	9	1721	31	435735
8/1/2005	7	8	1712	31	435735
7/1/2005	12	13	1704	30	435735
6/1/2005	21	23	1691	30	435735
5/2/2005	40	43	1668	31	435735
4/1/2005	71	76	1625	31	435735
3/1/2005	83	86	1549	28	435735
2/1/2005	89	92	1463	29	435735
1/3/2005	98	103	1371	33	435735
12/1/2004	64	68	1268	30	435735
11/1/2004	28	31	1200	31	435735
10/1/2004	16	18	1169	30	435735
9/1/2004	9	10	1151	30	435735
8/2/2004	9	10	1141	33	435735
6/30/2004	8	9	1131	28	435735
6/1/2004	27	30	0	29	435735
5/3/2004	35	38	0	32	435735
4/1/2004	46	50	0	31	435735
3/1/2004	81	84	0	28	435735
2/2/2004	97	99	0	31	435735
1/2/2004	79	83	0	32	435735
12/1/2003	85	90	0	31	435735
10/30/2003	27	29	0	30	435735
10/1/2003	15	16	0	29	435735
9/2/2003	8	9	0	32	435735
8/1/2003	8	9	0	31	435735
7/1/2003	9	10	0	29	435735



Customer Services

# Intermountain Gas Company

555 South Cole Road  
 P.O. Box 7608 • Boise, ID 83707-1608  
 www.intgas.com

Ralph W Leseberg  
 111 E 2<sup>nd</sup> N  
 Saint Anthony, ID 83445

February 2, 2007

RE: 111 E 2 N

Dear Mr. Leseberg:

During an audit of your account we discovered your meter has not been registering your natural gas usage accurately. Further investigation has revealed it has been malfunctioning since February 2006.

Historical usage in combination with weather data for this time period has enabled us to evaluate your natural gas consumption for this period.

The usage adjustment for the time frame in question is as follows:

<u>Month</u>	<u>Therms</u>	<u>Amount</u>
--------------	---------------	---------------

Please see attached

A charge of \$496.76 for therms you used but were not billed for will be reflected on your next billing statement. We value you as a customer and apologize for any inconvenience this may cause and are happy to make payment arrangements with you.

Please contact our Customer Service Center at 1-800-548-3679 to make needed arrangements or to answer any questions you may have. Thank you in advance for your understanding.

Cordially,

Billing Technician  
 Intermountain Gas Co.

# Exhibit F



## INTERMOUNTAIN GAS COMPANY

P.O. Box 64  
Boise, Idaho 83732  
www.intgas.com

(800) 548-3679

Call 7 AM - 7 PM Mon-Fri

SERVICE ADDRESS: 111 E 2 N, Saint Anthony, ID 83445

PAYMENT DUE DATE	ACCOUNT NUMBER	PAY THIS AMOUNT	
Mar 20, 2007	53852700-001-1	Level Pay	\$63.00

Total of Account - Previous Billing	\$231.28 CR
Payments Received	\$0.00
Balance Forward	\$231.28 CR

READING DATES			METER NUMBER	METER READINGS			TO = 100 CU FT X BILLING FACTOR = THERMS BILLED	
FROM	TO	DAYS		FROM				
Feb 01	Mar 01	28	488718	71	169	98	0.959	94

BILLING DATE	TYPE OF RATE	CURRENT ACTIVITY	THERMS	X	RATE	=	CHARGE
Mar 06, 2007	RS1	Current Usage	94		1.10287		\$103.67
		Customer Charge					\$6.50
		Municipal Franchise Fee					\$3.31
		Billing Adjustment					\$496.76

AVERAGE THERMS PER DAY	
THIS YEAR	LAST YEAR
3.4	1.2

Total Current Activity	\$610.24
Balance Forward	\$231.28 CR
Total of Account	\$378.96
Level Pay Due March 20, 2007	\$63.00

Effective February 12, 2007, Intermountain Gas changed credit card payment vendors from SpeedPay to BillMatrix. To pay by phone, call toll free 1-866-558-2808, or visit our website at www.intgas.com. BillMatrix charges a \$2.75 convenience fee for each payment.



## INTERMOUNTAIN GAS COMPANY

P.O. Box 64  
Boise, Idaho 83732  
www.intgas.com

PAYMENT DUE DATE	ACCOUNT NUMBER	PAY THIS AMOUNT	
Mar 20, 2007	53852700-001-1	Level Pay	\$63.00

538527000010000006300

Ralph W Leseberg  
Wanda H Leseberg  
111 E 2nd N  
Saint Anthony, ID 83445-1517



BALANCE FORWARD
\$231.28 CR
CURRENT CHARGES
\$610.24
TOTAL OF ACCOUNT
\$378.96
AMOUNT ENCLOSED

# View Customer --- Leseberg, Ralph W --- ()

June 7, 2007 2:26:49 PM

tshoen@TSHOEN\_LT1

Customer Token=53852700;

Co-Customer Summary		Customer Statement		Correspondence		Credit Score Summary		Order Summary	
Basics		Customer Logs Summary		Package Detail Summary		Payment Overview Summary		Print	
Customer Logs Summary/List		Type/Detail Log		Credit		Type		Log Text	
Date	Account Number	Type	Detail	Interface	Remittal	Cash Posting Note	Interface	Remittal	Cash Posting Note
05/09/2007	53852700-001	Payment Log		Interface	Remittal	Cash Posting Note			{Account=53852700001, Bank_Iq=F, Cash_Amount=0000012600, Batch_Num=014, Record_Type=8, Stub_Amount=0000012600}
03/28/2007	53852700-001	Payment Log		Interface	Remittal	Cash Posting Note			{Account=53852700001, Bank_Iq=F, Cash_Amount=0000006300, Batch_Num=006, Record_Type=8, Stub_Amount=0000006300}
02/14/2007	53852700	Customer log		Needs		Collections			Tamara @ PDC Complaint regarding billing adjustment
02/13/2007	53852700	Customer Log		makingery		CCR Note			set up LP at \$63.00 - includes estimated usage dead meter;
02/07/2007	53852700-01-001	Account Package Log		Brohlewski		Manual Charge			Dead meter. Rebilled Feb 06 - Jan 07 at the previous usage. The current usage on the meter 40% higher than Feb 2005. All therns \$496.76
02/07/2007	53852700	Customer Log		dhale		CCR Note			Wanda wants supervisor to call and explain how came up with the usage on a dead meter: 624-74

52 reviewed 0 remaining All records have been retrieved 0/52

Create Customer Log Turn On Service

Leseberg, Ralph W, 111 E 2 N, Saint Anthony, ID, \$63.00, 06/20/07, No Service Order, Credit Rating: Low Risk.



**From:** LYNN DAVIS  
**To:** FISETTE, MELINDA; IMLACH, CHERYL; SEVERE, PAM; WROBLEWSKI, LINDSAY  
**Date:** 2/13/2007 10:05:04 AM  
**Subject:** Re: Fwd: forward to supervisor about dead meter in St Anthony

Lindsay;

Just talked, [REDACTED], to Mrs. Lesebert. She will call to go back on level pay after missing the last two payments and agreed to make additional payments of \$41.40 per month to pay off the 496.76. I gave her your name in case she has any problem getting set up with these arrangements.

Thanks, Lynn

Lynn Davis  
District Manager, Idaho Falls  
Intermountain Gas Company  
(208) 542-6621 phone  
ldavis@intgas.com

>>> PAM SEVERE 2/7/2007 3:00 PM >>>

Customer Ralph Leseberg  
111 E 2 N in St. Anthony

It appears the customer called the CSC about the adjustment on this dead meter in St. Anthony. I haven't received any notification of an adjustment on this customer but looking at the statement, I'm assuming that the adjustment was only for the January usage and no letter or spreadsheet was issued.

From what I see on the statement, the customer actually used 71 feet on the new meter and we showed usage on the old meter of 62 feet. Again, I'm assuming that the 62 feet is the estimated usage for Jan 02 to Jan 16 was based on the actual usage which averaged 4.43 feet per day for those days. There were no notes in the customer or premise log to go by.

Let me know if I'm assuming right and I'll return the call to the customer.

Thanks so much

>>> MARGARITA ROMERO 2/7/2007 12:45:05 PM >>>  
Forwarding info to your office. Customer requesting call back on dead meter computation.

>>> DIANA HALE 2/7/2007 12:31 PM >>>  
account 53852700 Ralph Leseberg at 111 E 2 N Wanda wants supervisor to call and explain how we came up with the usage on a dead meter. 624-7182 perfer call in am

**From:** LINDSAY WROBLEWSKI  
**To:** MIKE KINGERY  
**Date:** 2/13/2007 11:48:57 AM  
**Subject:** Re: Fwd: forward to supervisor about dead meter in St Anthony

Mike,  
Can you please put this customer back on Level Pay and set up the contract per Lynn's request?



**Exhibit I**  
**E-mails 1-10**

Read_Date	Billed_Usage	Metered_Usage	Read_Num	Days_Cnt	Equipment_Id_Code
2/1/2007	71	71	71	16	488718
1/16/2007	0	0	0	0	488718
1/16/2007	62	62	2208	14	435735
1/2/2007	19	20	2146	32	435735
12/1/2006	9	10	2126	30	435735
11/1/2006	6	6	2116	30	435735
10/2/2006	2	2	2110	31	435735
9/1/2006	1	1	2108	31	435735
8/1/2006	0	0	2107	29	435735
7/3/2006	2	2	2107	32	435735
6/1/2006	4	5	2105	31	435735
5/1/2006	6	7	2100	28	435735
4/3/2006	9	10	2093	33	435735
3/1/2006	35	36	2083	28	435735
2/1/2006	65	68	2047	29	435735
1/3/2006	118	121	1979	33	435735
12/1/2005	73	77	1858	30	435735
11/1/2005	41	45	1781	29	435735
10/3/2005	14	15	1736	32	435735
9/1/2005	8	9	1721	31	435735
8/1/2005	7	8	1712	31	435735
7/1/2005	12	13	1704	30	435735
6/1/2005	21	23	1691	30	435735
5/2/2005	40	43	1668	31	435735
4/1/2005	71	76	1625	31	435735
3/1/2005	83	86	1549	28	435735
2/1/2005	89	92	1463	29	435735
1/3/2005	98	103	1371	33	435735
12/1/2004	64	68	1268	30	435735
11/1/2004	28	31	1200	31	435735
10/1/2004	16	18	1169	30	435735
9/1/2004	9	10	1151	30	435735
8/2/2004	9	10	1141	33	435735
6/30/2004	8	9	1131	28	435735
6/1/2004	27	30	0	29	435735
5/3/2004	35	38	0	32	435735
4/1/2004	46	50	0	31	435735
3/1/2004	81	84	0	28	435735
2/2/2004	97	99	0	31	435735
1/2/2004	79	83	0	32	435735
12/1/2003	85	90	0	31	435735
10/30/2003	27	29	0	30	435735
10/1/2003	15	16	0	29	435735
9/2/2003	8	9	0	32	435735
8/1/2003	8	9	0	31	435735
7/1/2003	9	10	0	29	435735

2



**Exhibit I  
E-mails 1-10**

**From:** MIKE KINGERY  
**To:** LUCINDA MEEDS; MIKE KINGERY  
**Date:** 2/15/2007 4:39 PM  
**Subject:** Fwd: RE: Idaho -PUC- LESEBURG, RALPH  
**Attachments:** leseberg.xls

[Redacted]

(4)

Tammie,  
Answers are in bold below:

What was wrong with the meter?

**The meter was malfunctioning, but rather than going completely dead, it appears to have been going progressively slower over a period of time.**

Was it completely replaced and if so, what was the date? I see there were therms recorded for usage.

**The meter was replaced on 1-16-2007**

How did company determine that it was not actual usage?

**Consumption for recent months fell well below prior historical usage. A technician was dispatched to inspect the meter.**

How was the increase of 40% calculated?

**After setting the new meter on 1-16-2007 a follow up read was completed on 2-1-2007. The 4.43 ccf of daily use during that time was higher to the comparable time period a year prior as well as using 40% more during that time period from two years ago.**

What factors were used to figure the new calculated usage if company did not feel the meter was working correctly?

**With the follow up read indicating a considerable increase over historical usage and taking the weather during that time period into account, estimated consumption was created based on actual historical usage. This resulted in a calculation to the favor of the customer.**

Please provide a four year history for this account.

**The four year history was included in the original response. I have attached it again, highlighting when the meter was changed.**

Thanks,  
-Mike

>>> "Tammie Estberg" <Tammie.Estberg@puc.idaho.gov> [Redacted]

(3)

Mike,

What was wrong with the meter?

Was it completely replaced and if so, what was the date? I see there were therms recorded for usage.

How did company determine that it was not actual usage?

How was the increase of 40% calculated?

What factors were used to figure the new calculated usage if company did not feel the meter was working correctly?

Please provide a four year history for this account.

Also, I heard Wanda (customer of record) answering the daughter's questions while on the phone to me, so I am sure it will not be difficult to fulfill INTG's requirements to allow Wanda access to information. Until which time it can be provided to the company, I will only give information to customer.

Thanks,  
Tammie

-----Original Message-----

From: MIKE KINGERY [mailto:MKINGERY@intgas.com]

Sent: Wednesday, February 14, 2007 2:44 PM

Exhibit I  
E-mails 1-10

From: MIKE KINGERY  
To: LUCINDA MEEDS  
Date: [REDACTED]  
Subject: Fwd: RE: Idaho -PUC- LESEBURG, RALPH

5

FYI

>>> "Tammie Estberg" <Tammie.Estberg@puc.idaho.gov> 2/16/2007 1:40:50 PM >>>

Mike,

Thanks for the information. Sorry about the usage history. I did not get it when I printed the attachments the first time. I will be out of the office until next Friday for work. I have not had a chance to review the information and discuss it with the customer. I will follow up with customer and Company when I return.

Thanks,  
Tammie

-----Original Message-----

From: MIKE KINGERY [mailto:MKINGERY@intgas.com]  
Sent: Thursday, February 15, 2007 4:32 PM  
To: Tammie Estberg  
Subject: RE: Idaho -PUC- LESEBURG, RALPH

Tammie,  
Answers are in bold below:

What was wrong with the meter?

**The meter was malfunctioning, but rather than going completely dead, it appears to have been going progressively slower over a period of time.**

Was it completely replaced and if so, what was the date? I see there were therms recorded for usage.

**The meter was replaced on 1-16-2007**

How did company determine that it was not actual usage?

**Consumption for recent months fell well below prior historical usage. A technician was dispatched to inspect the meter.**

How was the increase of 40% calculated?

**After setting the new meter on 1-16-2007 a follow up read was completed on 2-1-2007. The 4.43 ccf of daily use during that time was higher to the comparable time period a year prior as well as using 40% more during that time period from two years ago.**

What factors were used to figure the new calculated usage if company did not feel the meter was working correctly?

**With the follow up read indicating a considerable increase over historical usage and taking the weather during that time period into account, estimated consumption was created based on actual historical usage. This resulted in a calculation to the favor of the customer.**

Please provide a four year history for this account.

**The four year history was included in the original response. I have attached it again, highlighting when the meter was changed.**

Thanks,  
-Mike

>>> "Tammie Estberg" <Tammie.Estberg@puc.idaho.gov> 2/15/2007 3:11 PM >>>

Mike,

What was wrong with the meter?

Was it completely replaced and if so, what was the date? I see there were therms recorded for usage.

How did company determine that it was not actual usage?

How was the increase of 40% calculated?

What factors were used to figure the new calculated usage if company did not feel the meter was working

**Exhibit I  
E-mails 1-10**

**From:** MIKE KINGERY  
**To:** Tammie Estberg  
**Subject:** RE: Idaho -PUC- LESEBURG, RALPH

1

I have not yet received the results of the meter test. The meter was initially identified due to its decreased consumption and upon field inspection, the technician determined the meter was dead.

The historical consumption showed a sharp decline compared to prior years beginning in February 2006, which was the basis for the estimated calculation. Based on the consumption recorded on the new meter, it is possible the malfunctioning meter was registering slowly for a longer period of time than originally identified.

-Mike

>>> "Tammie Estberg" <Tammie.Estberg@puc.idaho.gov>

[REDACTED]

2

Hello Mike,

In reviewing this complaint I would still like to have a copy of the meter test results and a firm explanation of the meter malfunction. Define the meter malfunction, it appears to not have been a dying meter as the original reported usage does not show a steady decline.

Thank you,  
Tammie



**Exhibit I  
E-mails 1-10**

**From:** MIKE KINGERY  
**To:** Tammie Estberg  
**Subject:** RE: Idaho -PUC- LESEBURG, RALPH  
**Attachments:** MeterTestLeseberg.doc

9

Tammie,

I have received the meter test and it is attached. The broken wiggler prevented the meter from fully registering consumption, even though the rest of the meter was fully functional.

-Mike

>>> "Tammie Estberg" <Tammie.Estberg@puc.idaho.gov> 3/13/2007 2:07 PM

8

Mike,

Customer is filing a formal complaint next week on this issue. I have not received the meter test results, please provide them asap.

Thanks,  
Tammie

-----Original Message-----

**From:** MIKE KINGERY [mailto:MKINGERY@intgas.com]  
**Sent:** Tuesday, March 13, 2007 10:23 AM  
**To:** Tammie Estberg  
**Subject:** RE: Idaho -PUC- LESEBURG, RALPH

I have not yet received the results of the meter test. The meter was initially identified due to its decreased consumption and upon field inspection, the technician determined the meter was dead.

The historical consumption showed a sharp decline compared to prior years beginning in February 2006, which was the basis for the estimated calculation. Based on the consumption recorded on the new meter, it is possible the malfunctioning meter was registering slowly for a longer period of time than originally identified.

-Mike

>>> "Tammie Estberg" <Tammie.Estberg@puc.idaho.gov> 3/13/2007 8:43:12 AM >>>

Hello Mike,

In reviewing this complaint I would still like to have a copy of the meter test results and a firm explanation of the meter malfunction. Define the meter malfunction, it appears to not have been a dying meter as the original reported usage does not show a steady decline.

Thank you,  
Tammie

**Exhibit I**  
**E-mails 1-10**

10

**From:** MIKE KINGERY  
**To:** TERRI SHOEN  
**Date:** 4/20/2007 3:06 PM  
**Subject:** Fwd: Idaho -PUC- LESEBURG, RALPH

>>> "Tammie Estberg" <Tammie.Estberg@puc.idaho.gov> 4/20/2007 11:07 AM >>>  
Mike,

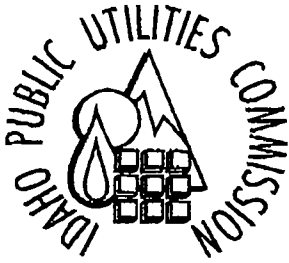
The PUC has received a formal complaint from Mr. Leseburg, a copy of which I will be faxing to your office. In reviewing the informal complaint I do not have a direct response from the company regarding a possible adjustment to the rebilling.

The informal complaint was opened during a period of conversations between Intermountain Gas's employees handling the adjusted rebilling and PUC staff. During those conversations, it was stated by the Company that heating degree day mythology is not used when recalculating adjusted billings. A PUC staff engineer recalculated the billing for the Leseburg's based on degree day heating. It is unclear whether or not this information was used as an example during discussion between the Company and staff. I am sending by fax a copy of the calculated adjustment using heating degree day for this customer.

Based on the customer's dispute of the rebilling calculated by the Company and supported by PUC staff's calculation using heating degree day, is the Company willing to compromise on the rebilling to accept the 7.21% lower bill reflected in the heating degree day calculations? Is the Company willing to make any adjustments to its calculated rebilling for this customer?

Thank you,

Tammie Estberg  
Utilities Compliance Investigator



## FAX Correspondence

**To:** Intermountain Gas Co. Attn: Mike Kingery  
**Fax:** 208-377-~~6170~~ 6070/  
**Date & Time:** April 20, 2007 (11:13 AM)  
**From:** Tammie Estberg - Compliance Investigator  
**Re:** Leseburg Complaint

This transmission is <sup>15</sup> page(s) including the cover sheet.

Heating Degree Day Calculations

Formal complaint from Leseburg

Feel free to contact me at [Tammie.Estberg@puc.idaho.gov](mailto:Tammie.Estberg@puc.idaho.gov) or by calling 208-334-0380.

Sincerely,

Tammie Estberg  
Utilities Compliance Investigator

*539-PUC*

*3/29*

*29*

**CALCULATION OF HEATING DEGREE DAYS - St. Anthony Area**

	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
Dec	1222	1403	1335	
Nov	1007	1041	986	
Oct	672	654	746	
Sep	354	348	364	
Aug	124	93	78	
Jul	48	26	23	
Jun	137	303	152	
May		469	405	
Apr		721	687	
Mar		1059	1098	
Feb		1201	1254	1062
Jan		1270	1271	1597

Prepared February 2007

Page 1 of 5

Leseberg Re-Billing Analysis

Leseberg Re-Billing Analysis

Read Date	Use Period	2006		HDD's	Use Period	2005		2004	
		Therms Billed	Therms Re-Billed			Therms Used & Billed	HDD's	Use Period	Therms Used
2/1/2006	Jan	65	88	1271	Jan	65	1270	Jan	89
1-Mar	Feb	35	83	1254	Feb	83	1201	Feb	81
4/3/2006	Mar	9	75	1098	Mar	71	1059	Mar	46
5/1/2006	Apr	6	35	687	Apr	40	721	Apr	35
6/1/2006	May	4	21	405	May	21	469	May	27
7/3/2006	Jun	2	11	152	Jun	12	303	Jun	8
8/1/2006	Jul	0	6	23	Jul	7	26	Jul	9
9/1/2006	Aug	1	8	78	Aug	8	93	Aug	9
10/2/2006	Sep	2	13	364	Sep	14	348	Sep	16
11/1/2006	Oct	6	43	746	Oct	41	654	Oct	28
12/1/2006	Nov	9	73	986	Nov	73	1041	Nov	64
1/2/2007	Dec	19	113	1335	Dec	118	1403	Dec	98
	Totals	158	569	8399		553	8588		510

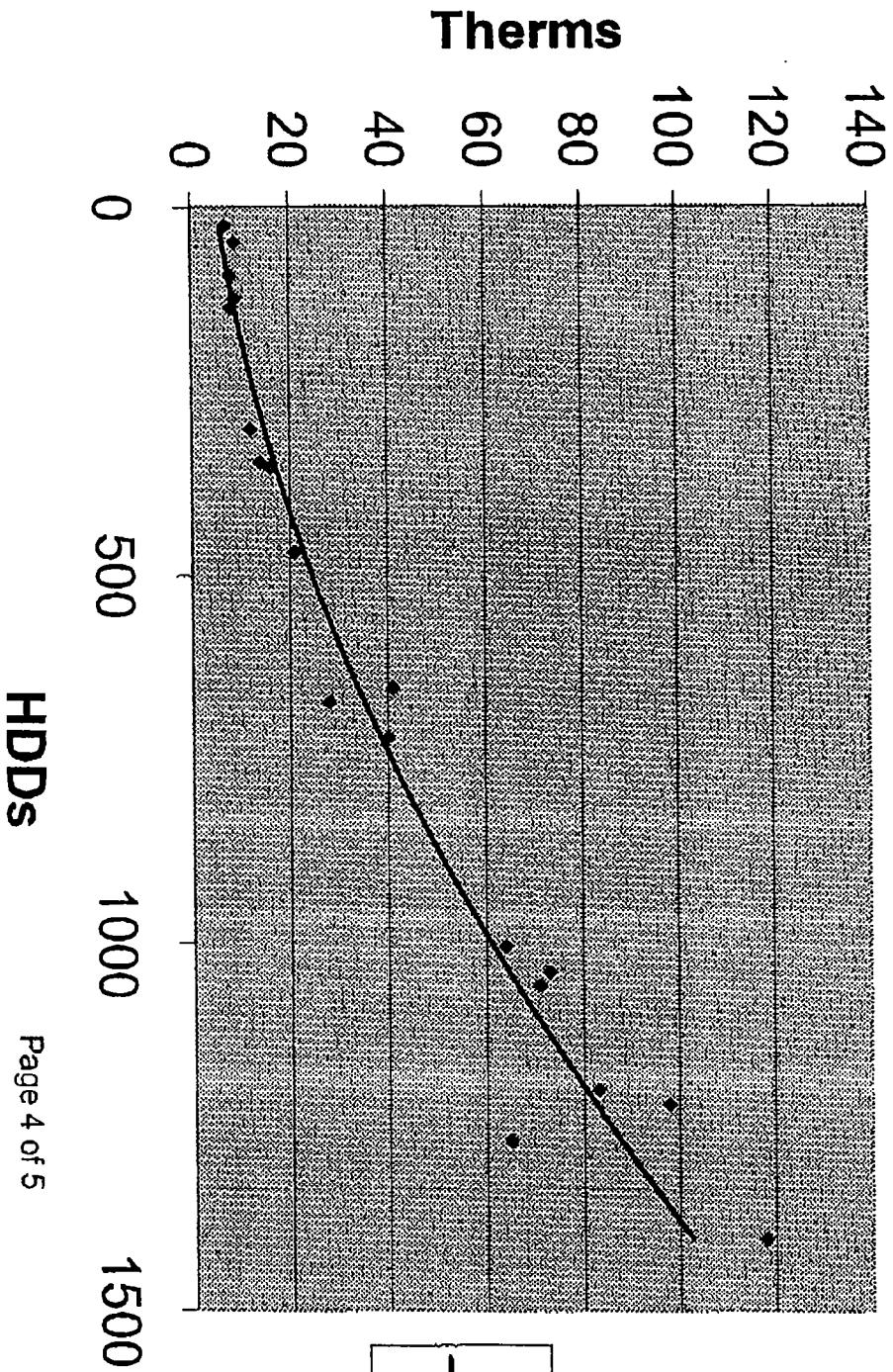
Leseberg Re-Billing Analysis

<b>Historical Use, Prior to Meter Error Period</b>				
<b>month year xxyy</b>	<b>Actual Therms Used</b>	<b>Hdd's</b>	<b>Therms calculated Using Binomial Equation</b>	
705	7	26	5.93	
604	8	137	8.80	
805	8	93	7.58	
704	9	48	6.44	
804	9	124	8.43	
605	12	303	14.48	
905	14	348	16.31	
904	16	354	16.56	
505	21	469	21.81	
1004	28	672	33.02	
405	40	721	36.10	
1005	41	654	31.93	
1104	64	1007	56.93	
1005	65	1270	80.42	
106	65	1271	80.52	
305	71	1059	61.25	
1105	73	1041	59.74	
205	83	1201	73.86	
1204	98	1222	75.83	
5012	118	1403	93.88	
<b>Page 3 of 5</b>			<b>789.82</b>	

### Therms as a Function of Heating Degree Days

$$y = 3E-05x^2 + 0.021x + 5.3649$$

$$R^2 = 0.923$$



◆ Therms as a function of HDDs  
— Poly. (Therms as a function of HDDs)

Leseberg Re-Billing Analysis

	Calculated Therms Rebilled	Therms ActuallyR e-Billed		
Feb	79	88		
Mar	65	83		
Apr	34	75		
May	19	35		
Jun	9	21		
Jul	6	11		
Aug	7	6		
Sep	17	8		
Oct	38	13		
Nov	55	43		
Dec	87	73		
Jan-07	115	113		
	530.7	569		
		7.21%	high	
			Page 5 of 5	



FILED  
2007 APR 16 PM 2:42  
IDaho PUBLIC  
UTILITIES COMMISSION

April 13, 2007 .

Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Id. 83702

RE: Formal Complaint against Intermountain Gas Company

Dear Commissioners,

Upon receipt of the February 2007 payment statement, my mother called Intermountain Gas Company to inquire about the current charge of \$157.78, which was much higher than it had been from the previous month. She was told that there was an outstanding bill in the amount of \$496.76 (which was not listed on the February billing) and that a letter would be sent explaining the reason and charges. He indicated that they would estimate the monthly charges to compensate for a malfunctioning meter. In mid January someone from Intermountain Gas Company came and replaced the gas meter stating that it was malfunctioning.

We received the letter approximately February 12<sup>th</sup> to 14<sup>th</sup> (see enclosed copies). On February 14<sup>th</sup> I contacted the Idaho Public Utilities Commission and Tammie Estberg called me back. I wanted to know if Intermountain Gas Company could actually retroactively bill for a malfunctioning meter. Tammie Estberg told me she would investigate and get back to me. When Tammie Estberg called back she indicated that the Company is allowed to correct billing errors.

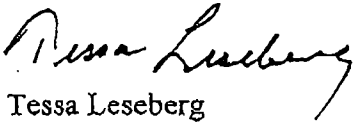
However, everything should be done in a timely period. Their failure to react quickly is irresponsible and unacceptable. Its incomprehensive to allow anyone 12 months, not only to discover a malfunction, but then to be able to estimate and bill for it. How is it possible for them to know if the home was occupied every single day of every month and how much they used the furnace during that entire 12 month period. Instead they used the same Therm calculations from the previous year and heating degree data (see enclosed copies).

To further complicate the whole issue, now it seems that Intermountain Gas Company did

not have a malfunctioning meter but instead it was broken wrigglers when the CT metering software was installed on the meters (see enclosed copies).

Therefore, I submit that the CT metering software company should absorb the cost since they provided faulty equipment and Intermountain Gas Company should collect the disputed bill from them. The responsibility needs to be assumed by the above two parties and not the consumer who can only trust that they are being billed with accurate equipment and timely maintenance.

Sincerely,



Tessa Leseberg  
For Ralph W. Leseberg  
Wanda H. Leseberg  
111 E. 2<sup>nd</sup> North  
St. Anthony, Id 83445



Customer Services

# Intermountain Gas Company

555 South Cole Road  
P.O. Box 7608 • Boise, ID 83707-1608  
www.intgas.com

Ralph W Leseberg  
111 E 2<sup>nd</sup> N  
Saint Anthony, ID 83445

February 2, 2007

RE: 111 E 2 N

Dear Mr. Leseberg:

During an audit of your account we discovered your meter has not been registering your natural gas usage accurately. Further investigation has revealed it has been malfunctioning since February 2006.

Historical usage in combination with weather data for this time period has enabled us to evaluate your natural gas consumption for this period.

The usage adjustment for the time frame in question is as follows:

<u>Month</u>	<u>Therms</u>	<u>Amount</u>
--------------	---------------	---------------

Please see attached

A charge of \$496.76 for therms you used but were not billed for will be reflected on your next billing statement. We value you as a customer and apologize for any inconvenience this may cause and are happy to make payment arrangements with you.

Please contact our Customer Service Center at 1-800-548-3679 to make needed arrangements or to answer any questions you may have. Thank you in advance for your understanding.

Cordially,

Billing Technician  
Intermountain Gas Co.

Ralph W Leseberg  
53852700

**AS BILLED**

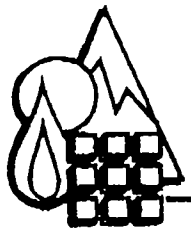
**SHOULD HAVE BEEN BILLED**

MONTH	CCF	FACTOR	THERM	Rate	Charge	CC	MFF	AMOUNT	CCF	FACTOR	THERM	RATE	Charge	CC	MFF	AMOUNT
Feb-06	68	0.963	65	1.14245	74.26	6.5	2.42	83.18								
Mar-06	36	0.978	35	1.14245	39.99	6.5	1.39	47.88								
Apr-06	10	0.943	9	1.25501	11.3	2.5	0.41	14.21								
May-06	7	0.921	6	1.25501	7.53	2.5	0.3	10.33								
Jun-06	5	0.899	4	1.25501	5.02	2.5	0.23	7.75								
Jul-06	2	0.878	2	1.25501	2.51	2.5	0.15	5.16								
Aug-06	0	0.865	0	1.25501	0	2.5	0.08	2.58								
Sep-06	1	0.879	1	1.25501	1.26	2.5	0.11	3.87								
Oct-06	2	0.907	2	rate chang	2.51	2.5	0.15	5.16								
Nov-06	6	0.928	6	1.21543	7.29	2.5	0.29	10.09								
Dec-06	10	0.944	9	1.10287	9.93	6.5	0.49	18.92								
Jan-07	20	0.969	19	1.10287	20.95	6.5	0.82	28.27								
	167		158		182.55	46	6.84	235.39	600		569		664.83	46	21.32	732.15

Therms: 411  
Charge: 482.28  
MFF: 14.48  
Total: \$ 496.76

RS1 ICL

39



**IDAHO  
PUBLIC UTILITIES  
COMMISSION**

Dirk Kempthorne, Governor

P.O. Box 83720, Boise, Idaho 83720-0074

Paul Kjellander, President  
Marsha H. Smith, Commissioner  
Dennis S. Hansen, Commissioner

March 29, 2007

Tessa Leseburg  
Ralph Leseburg  
111 East 2<sup>nd</sup> North  
St. Anthony, ID 83445

RE: Intermountain Gas adjusted billing

Dear Tessa,

I have researched your complaint questioning the accuracy of Intermountain Gas Company's re-billing of this account. The Company states that the meter was not working properly resulting in the account being billed for a portion of the actual usage. The Company is allowed to correct a billing error under Utility Customer Relations Rules (UCRR) 204. I have enclosed the Company proved spreadsheet showing the billed amount and the adjusted billing. UCRR 313 requires a utility to accept payment arrangements extending for the same duration of time covered in the adjusted billing. Intermountain Gas states it has addressed payment arrangements with you.

During our phone conversation, you indicated that you would like information on filing a Formal Complaint. It is not necessary to have an attorney to file a Formal Complaint. Enclosed are instructions on filing a Formal Complaint with the PUC, copies of the UCRR that address back billing and payments of the amounts adjusted, copies of the information provided from Intermountain Gas for this account, and a calculated re-billing done by PUC Staff engineer. The example PUC re-billing, used an industry standard formula that includes heating degree day method. Heating degree day method is not used by Intermountain Gas. I am unable to explain the company's method any further than what they have already provided. Our office is still waiting for the results of the meter testing from the Company which should show why and to what percentage the meter may have been misreading.

If you have further questions, please feel free to contact me again.

Sincerely,

Tammie Estberg  
Utilities Compliance Investigator  
800-432-0369

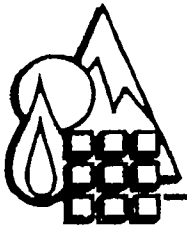
*Company provided historical usage*

Read_Date	Billed_Usage	Metered_Usage	Read_Num	Days_Cnt	Equipment_Id_Code	Read_Code
2/1/2007	71	71	71	16	488718	MAMR Read
1/16/2007	0	0	0	0	488718	Manual Read
1/16/2007	62	62	2208	14	435735	
1/2/2007	19	20	2146	32	435735	MAMR Read
12/1/2006	9	10	2126	30	435735	MAMR Read
11/1/2006	6	6	2116	30	435735	MAMR Read
10/2/2006	2	2	2110	31	435735	MAMR Read
9/1/2006	1	1	2108	31	435735	MAMR Read
8/1/2006	0	0	2107	29	435735	MAMR Read
7/3/2006	2	2	2107	32	435735	MAMR Read
6/1/2006	4	5	2105	31	435735	MAMR Read
5/1/2006	6	7	2100	28	435735	MAMR Read
4/3/2006	9	10	2093	33	435735	MAMR Read
3/1/2006	35	36	2083	28	435735	MAMR Read
2/1/2006	65	68	2047	29	435735	MAMR Read
1/3/2006	118	121	1979	33	435735	MAMR Read
12/1/2005	73	77	1858	30	435735	MAMR Read
11/1/2005	41	45	1781	29	435735	MAMR Read
10/3/2005	14	15	1736	32	435735	MAMR Read
9/1/2005	8	9	1721	31	435735	MAMR Read
8/1/2005	7	8	1712	31	435735	MAMR Read
7/1/2005	12	13	1704	30	435735	MAMR Read
6/1/2005	21	23	1691	30	435735	MAMR Read
5/2/2005	40	43	1668	31	435735	MAMR Read
4/1/2005	71	76	1625	31	435735	MAMR Read
3/1/2005	83	86	1549	28	435735	MAMR Read
2/1/2005	89	92	1463	29	435735	MAMR Read
1/3/2005	98	103	1371	33	435735	MAMR Read
12/1/2004	64	68	1268	30	435735	MAMR Read
11/1/2004	28	31	1200	31	435735	MAMR Read
10/1/2004	16	18	1169	30	435735	MAMR Read
9/1/2004	9	10	1151	30	435735	MAMR Read
8/2/2004	9	10	1141	33	435735	MAMR Read
6/30/2004	8	9	1131	28	435735	Conversion
6/1/2004	27	30	0	29	435735	Conversion
5/3/2004	35	38	0	32	435735	Conversion
4/1/2004	46	50	0	31	435735	Conversion
3/1/2004	81	84	0	28	435735	Conversion
2/2/2004	97	99	0	31	435735	Conversion
1/2/2004	79	83	0	32	435735	Conversion
12/1/2003	85	90	0	31	435735	Conversion
10/30/2003	27	29	0	30	435735	Conversion
10/1/2003	15	16	0	29	435735	Conversion
9/2/2003	8	9	0	32	435735	Conversion
8/1/2003	8	9	0	31	435735	Conversion
7/1/2003	9	10	0	29	435735	Conversion

*MAMR = automated meter reading*

	<i>PUC</i> Calculated Therms Rebilled	<i>Company</i> Therms Re- Billed
Feb	79	88
Mar	65	83
Apr	34	75
May	19	35
Jun	9	21
Jul	6	11
Aug	7	6
Sep	17	8
Oct	38	13
Nov	55	43
Dec	87	73
Jan-07	115	113
	530.7	569
		7.21% high

*PUC staff used heating degree day to figure consumption.*



IDAHO  
PUBLIC UTILITIES  
COMMISSION

Dirk Kempthorne, Governor

P.O. Box 83720, Boise, Idaho 83720-0074

Paul Kjellander, President  
Marsha H. Smith, Commissioner  
Dennis S. Hansen, Commissioner

April 3, 2007

Tessa Leseburg  
Ralph Leseburg  
111 East 2<sup>nd</sup> North  
St. Anthony, ID 83445

RE: Intermountain Gas Meter

Dear Tessa,

Attached is the meter test results supplied by Intermountain Gas for the meter at your address. Intermountain Gas now states that the problem was not a malfunctioning meter but rather a broken wriggler. A wriggler is involved in the recording of consumption information used by the Company to determine the billing.

The Company may have experienced a number of broken wrigglers when the CT Metering software was installed on meters. CT Meters enable the Company to collect consumption readings by remote receivers.

Please let me know if you have further questions.

Sincerely,

Tammie Estberg  
Compliance Investigator  
208-334-0369



INTERMOUNTAIN GAS COMPANY  
METER SHOP  
SPECIAL TEST REPORT

Company # 435735 Mfg. # A00136567 Date 04/02/2007  
Meter Type AC-250 Set Date 07/16/2002 Remove Date 01/16/2007  
Account # 6725575 Index Read 2037  
ERT Number 19448128 ERT Read 2156.14  
Removed For: Dead Removed By: Lewis Bird.

Customer Name \_\_\_\_\_

Customer Address 111 E. 2<sup>nd</sup>. N. St. Anthony Idaho

Prover Room Temp. 71 F Prover Temp. 71 F

Test Data Check Test: 099.4 Open Test: 099.5

Meter Drive Rate: 1 Ft. ERT Drive Rate: 1 Ft.

Tamper Seals: Yes  No

Tested By: Mr. Mark Cirelli Witnessed By: John Atwater

Test Requested By: Mr. Lynn Davis Location: Idaho Falls

Comments: Broken Wiggler. Please Note Meter and ERT Reads.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Retain in Mtr. Shop:  Date: 04/02/2007 Return to District:  Date: \_\_\_\_\_

Copies: Original - Meter Shop Second - Requesting Mgr. / Office Third - Credit Mgr.

PS 14

## UTILITY CUSTOMER RELATIONS RULES

IDAPA 31.21.01

underbilled shall be given the opportunity to make payment arrangements under Rule 313 on the amount due. At the customer's option, the term of the payment arrangement may extend for the length of time that the underbilling accrued. The utility shall promptly refund amounts overpaid by the customer unless the customer consents to a credit against future bills, except overbillings not exceeding \$15 may be credited to future bills. (7-1-93)

[Adopted as Rule 8.1, O.N. 17744; amended and recodified, G.O. 177.]

Statutory Reference: *Idaho Code* § 61-642.

Cross-Reference: Rules 005, 200, 204.

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

**01. Errors in Preparation – Malfunctions – Failure to Bill.** Whenever the billing for utility service was not accurately determined because a meter malfunctioned or failed, bills were estimated, or bills were inaccurately prepared, the utility shall prepare a corrected billing. If the utility has failed to bill a customer for service, the utility shall prepare a bill for the period during which no bill was provided. (7-1-93)

**02. Corrections.** If the time when the malfunction or error began or the time when the utility began to fail to bill for service cannot be reasonably determined to have occurred within a specific billing period, the corrected billings shall not exceed the most recent six months before the discovery of the malfunction or error or failure to bill. If the time when the malfunction or error or failure to bill began can be reasonably determined, the corrected billings shall go back to that time, but not to exceed the time provided by Section 61-642, Idaho Code, (three (3) years). (7-1-93)

**03. Refunds and Additional Payments.** The utility shall prepare a corrected billing indicating the refund due to the customer or the amount due the utility. A customer who has been underbilled or who has not been billed shall be given the opportunity to make payment arrangements under Rule 313 on the amount due. At the customer's option, the term of the payment arrangement may extend for the length of time that the underbilling accrued or the customer was not billed. The utility shall promptly refund amounts overpaid by the customer unless the customer consents to a credit against future bills, except overbillings not exceeding \$15 may be credited to future bills. (7-1-93)

[Adopted as Rule 8.2 and 8.3, O.N. 17744; amended and recodified, G.O. 177.]

Statutory Reference: *Idaho Code* § 61-642.

Cross-Reference: Rules 005, 203, 313.

**205. (RESERVED).**

# Exhibit L

## Ralph W Leseberg 53852700

111 E 2nd N., St Anthony

### AS BILLED

### SHOULD HAVE BEEN BILLED

MONTH	FACTOR		THERM	Rate	Charge	CC	MFF	AMOUNT		FACTOR		THERM	RATE	Charge	CC	MFF	AMOUNT
	CCF									CCF							
Feb-06	68	0.963	65	1.14245	74.26	6.5	2.42	83.18		91	0.963	88	1.14245	100.54	6.5	3.21	110.25
Mar-06	36	0.978	35	1.14245	39.99	6.5	1.39	47.88		85	0.978	83	1.14245	94.82	6.5	3.04	104.36
Apr-06	10	0.943	9	1.25501	11.3	2.5	0.41	14.21		80	0.943	75	1.25501	94.13	2.5	2.9	99.53
May-06	7	0.921	6	1.25501	7.53	2.5	0.3	10.33		38	0.921	35	1.25501	43.93	2.5	1.39	47.82
Jun-06	5	0.899	4	1.25501	5.02	2.5	0.23	7.75		23	0.899	21	1.25501	26.36	2.5	0.87	29.73
Jul-06	2	0.878	2	1.25501	2.51	2.5	0.15	5.16		13	0.878	11	1.25501	13.81	2.5	0.49	16.8
Aug-06	0	0.865	0	1.25501	0	2.5	0.08	2.58		7	0.865	6	1.25501	7.53	2.5	0.3	10.33
Sep-06	1	0.879	1	1.25501	1.26	2.5	0.11	3.87		9	0.879	8	1.25501	10.04	2.5	0.38	12.92
Oct-06	2	0.907	2	rate chang	2.51	2.5	0.15	5.16		14	0.907	13	rate chang	16.28	2.5	0.56	19.34
Nov-06	6	0.928	6	1.21543	7.29	2.5	0.29	10.08		46	0.928	43	1.21543	52.26	2.5	1.64	56.4
Dec-06	10	0.944	9	1.10287	9.93	6.5	0.49	16.92		77	0.944	73	1.10287	80.51	6.5	2.61	89.62
Jan-07	20	0.969	19	1.10287	20.95	6.5	0.82	28.27		117	0.969	113	1.10287	124.62	6.5	3.93	135.05
	167		158		182.55	46	6.84	235.39		600		569		664.83	46	21.32	732.15

Therms: 411  
Charge: 482.28  
MFF: 14.48  
Total: \$ 496.76

Usage dropped significantly Feb 2006. Rebilled Feb - Jan at previous year's usage. Found customer currently using 40% more than Feb 2005 and 90% more than Feb 2006.

## Ralph W Leseberg 53852700

111 E 2nd N., St Anthony

### AS BILLED

### SHOULD HAVE BEEN BILLED

MONTH	FACTOR		THERM	Rate	Charge	CC	MFF	AMOUNT		FACTOR		THERM	RATE	Charge	CC	MFF	AMOUNT
	CCF									CCF							
Feb-06	68	0.963	65	1.14245	74.26	6.5	2.42	83.18		82	0.963	79	1.14245	90.25	6.5	2.9	99.65
Mar-06	36	0.978	35	1.14245	39.99	6.5	1.39	47.88		66	0.978	65	1.14245	74.26	6.5	2.42	83.18
Apr-06	10	0.943	9	1.25501	11.3	2.5	0.41	14.21		36	0.943	34	1.25501	42.67	2.5	1.36	46.53
May-06	7	0.921	6	1.25501	7.53	2.5	0.3	10.33		21	0.921	19	1.25501	23.85	2.5	0.79	27.14
Jun-06	5	0.899	4	1.25501	5.02	2.5	0.23	7.75		10	0.899	9	1.25501	11.3	2.5	0.41	14.21
Jul-06	2	0.878	2	1.25501	2.51	2.5	0.15	5.16		7	0.878	6	1.25501	7.53	2.5	0.3	10.33
Aug-06	0	0.865	0	1.25501	0	2.5	0.08	2.58		8	0.865	7	1.25501	8.79	2.5	0.34	11.63
Sep-06	1	0.879	1	1.25501	1.26	2.5	0.11	3.87		19	0.879	17	1.25501	21.34	2.5	0.72	24.56
Oct-06	2	0.907	2	rate chang	2.51	2.5	0.15	5.16		42	0.907	38	rate chang	16.28	2.5	0.56	19.34
Nov-06	6	0.928	6	1.21543	7.29	2.5	0.29	10.08		59	0.928	55	1.21543	66.85	2.5	2.08	71.43
Dec-06	10	0.944	9	1.10287	9.93	6.5	0.49	16.92		92	0.944	87	1.10287	95.95	6.5	3.07	105.52
Jan-07	20	0.969	19	1.10287	20.95	6.5	0.82	28.27		119	0.969	115	1.10287	126.83	6.5	4	137.33
	167		158		182.55	46	6.84	235.39		561		531		585.9	46	18.95	650.85

Therms: 373  
Charge: 403.35  
MFF: 12.11  
Total: \$ 415.46

PUC Calculation using binomial equation for predictive therms to degree days

## Ralph W Leseberg 53852700

111 E 2nd N., St Anthony

### AS BILLED

### SHOULD HAVE BEEN BILLED

MONTH	FACTOR		THERM	Rate	Charge	CC	MFF	AMOUNT		FACTOR		THERM	RATE	Charge	CC	MFF	AMOUNT
	CCF									CCF							
Feb-06	68	0.963	65	1.14245	74.26	6.5	2.42	83.18		90	0.963	87	1.14245	99.39	6.5	3.18	109.07
Mar-06	36	0.978	35	1.14245	39.99	6.5	1.39	47.88		94	0.978	92	1.14245	105.11	6.5	3.35	114.96
Apr-06	10	0.943	9	1.25501	11.3	2.5	0.41	14.21		82	0.943	77	1.25501	96.64	2.5	2.97	102.11
May-06	7	0.921	6	1.25501	7.53	2.5	0.3	10.33		37	0.921	34	1.25501	42.67	2.5	1.36	46.53
Jun-06	5	0.899	4	1.25501	5.02	2.5	0.23	7.75		21	0.899	19	1.25501	23.85	2.5	0.79	27.14
Jul-06	2	0.878	2	1.25501	2.51	2.5	0.15	5.16		10	0.878	9	1.25501	11.3	2.5	0.41	14.21
Aug-06	0	0.865	0	1.25501	0	2.5	0.08	2.58		7	0.865	6	1.25501	7.53	2.5	0.3	10.33
Sep-06	1	0.879	1	1.25501	1.26	2.5	0.11	3.87		9	0.879	8	1.25501	10.04	2.5	0.38	12.92
Oct-06	2	0.907	2	rate chang	2.51	2.5	0.15	5.16		15	0.907	14	rate chang	17.53	2.5	0.6	20.63
Nov-06	6	0.928	6	1.21543	7.29	2.5	0.29	10.08		54	0.928	50	1.21543	60.77	2.5	1.9	65.17
Dec-06	10	0.944	9	1.10287	9.93	6.5	0.49	16.92		70	0.944	66	1.10287	72.79	6.5	2.38	81.67
Jan-07	20	0.969	19	1.10287	20.95	6.5	0.82	28.27		113	0.969	109	1.10287	120.21	6.5	3.8	130.51
	167		158		182.55	46	6.84	235.39		602		571		667.83	46	21.42	735.25

Therms: 413  
Charge: 485.28  
MFF: 14.58  
Total: \$ 499.86

Calculation using historical usage and Degree Day variance with consideration for baseload

Cross Reference: Rules 15, 32, 33, 34, 35, 36, 37, 76, 113, 123, 202.

**040. (RESERVED).**

**RULES 41 THROUGH 50 – REPRESENTATIVES OF PARTIES**

**041. INITIAL PLEADING BY PARTY – LISTING OF REPRESENTATIVES (Rule 41).**

**01. Designation of Representative Required.** The initial pleading of each party to a proceeding (be it an application, petition, complaint, motion, or answer) must name the party's representative(s) for service and state each representative's mailing and electronic (if available) address for purposes of receipt of all official documents. Service of documents on the named representative(s) by mail or by electronic mail is valid service upon the party for all purposes in that proceeding. If no person is explicitly named as a party's representative, the person signing the pleading will be considered the party's representative. (3-16-04)

**02. Number Of Representatives.** No more than two persons may be designated as a party's representatives for purposes of service or receipt of official documents unless otherwise authorized by order. The Commission may condition such an order upon reasonable terms concerning payment of copying costs and mailing costs to additional representatives. (7-1-93)

[Adopted, G.O. 163; amended, G.O. 202; amended, 31-0101-0301.]

Court Rule Reference: I.R.C.P. 10(a)(1), 11(a)(1).

Cross Reference: Rules 15, 16, 31, 43, 44, 49, 51, 61, 62, 63, 64, 65, 72, 323, 332.

**042. TAKING OF APPEARANCES (Rule 42).**

The presiding officer at hearing or prehearing conference will take appearances to identify the representatives of all parties at the hearing. Parties whose pleadings have not been received by or distributed to all other parties may be required to state their interests at the hearing. (7-1-93)

[Adopted, G.O. 155; amended, G.O. 163.]

Cross Reference: Rules 41, 43.

**043. REPRESENTATION OF PARTIES AT PROCEEDINGS (Rule 43).**

Recognizing that proceedings before the Commission are sometimes administrative in nature or quasi-judicial in nature, appearances and representation of parties at hearing shall be as follows:

(3-16-04)

**01. Natural Person.** A natural person must represent himself or herself or be represented by a duly authorized employee, or an attorney. (3-16-04)

**02. Partnership.** A partnership must be represented by a partner, duly authorized employee, or an attorney. (7-1-93)

**03. Corporation.** A corporation must be represented by an officer, duly authorized employee, or an attorney. (7-1-93)

**04. Other Entity.** A municipal corporation, state, federal, tribal, or local government agency, or entity, incorporated association, or non-profit organization must be represented by an officer, a duly authorized employee or an attorney. (7-1-93)

**05. Attorney Representation.** Only an active member of the Idaho State Bar may represent a party as an attorney except as provided by Idaho Bar Commission Rule 222 (Limited Admission/Pro Hac Vice). The Commission adopts by incorporation Bar Rule 222 as modified below. (3-16-04)

a. Given the administrative nature of many proceedings, limited admission by out-of-state attorneys will not be necessary in conjunction with administrative filings such as tariff schedules, tariff advices, price lists, certificates to provide local exchange service, and interconnection agreements. Out-of-state attorneys representing the same party in one (1) or more quasi-judicial cases (such as formal complaints, motions, petitions, and applications that request modified procedure or an evidentiary hearing), must request limited admission at least one (1) time per calendar year. (3-16-04)

b. An attorney applying for limited admission to appear before the Commission in a representative capacity shall file a written motion with the Commission Secretary and serve a copy on all parties. The motion shall be substantially in the form set out in Bar Rule 222(1) with references to the Commission instead of the court. (3-16-04)

c. A copy of the written motion shall be submitted to the Idaho State Bar accompanied by the fee prescribed by Bar Rule 222(j). (3-16-04)

[Adopted, G.O. 155; amended, O.N. 15503; amended, O.N. 17001; amended, G.O. 163; amended, 31-0101-0301.]

Statutory Reference: *Idaho Code* § 61-619.

Case Reference: *Idaho State Bar Association v. Idaho Public Utilities Commission*, 102 Idaho 672, 637 P.2d 1168 (1981).

Bar Rule Reference: Idaho Bar Commission Rule 222.

Cross Reference: Rules 19, 41, 42, 257.

#### **044. SERVICE ON REPRESENTATIVES OF PARTIES AND OTHER PERSONS (Rule 44).**

From the time a party files its initial pleading in a proceeding, that party must serve and all other parties must serve all future documents listed in Rule 51 upon all other parties' representatives designated pursuant to Rule 41, unless otherwise directed by order or notice or by the presiding officer on the record. The Commission may order parties to serve past documents filed in the case upon those representatives. The Commission may order parties to serve past or future documents filed in the case upon persons not parties to the proceedings before the Commission.

[Adopted, G.O. 155; amended, G.O. 163; amended, G.O. 182; amended, 31-0101-0301.] (3-16-04)

Cross Reference: Rules 6, 41, 51, 62, 229, 255, 312.