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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION)
OF AVISTA CORPORATION FOR)
AUTHORITY TO INCREASE ITS RATES)
AND CHARGES FOR ELECTRIC AND)
NATURAL GAS SERVICE TO ELECTRIC)
AND NATURAL GAS CUSTOMERS IN)
THE STATE OF IDAHO.)**

**CASE NO. AVU-E-04-1/
AVU-G-04-1**

DIRECT TESTIMONY OF MARILYN PARKER

IDAHO PUBLIC UTILITIES COMMISSION

JUNE 21, 2004

1 Q. Please state your name and address for the
2 record.

3 A. My name is Marilyn Parker. My business
4 address is 472 West Washington Street, Boise, Idaho.

5 Q. By whom are you employed and in what capacity?

6 A. I am employed by the Idaho Public Utilities
7 Commission as a Utilities Compliance Investigator. I
8 accepted that position with the Consumer Assistance Staff
9 in November 2002.

10 Q. What is your educational and professional
11 background?

12 A. Prior to my employment with the Idaho Public
13 Utilities Commission, I had twenty years experience
14 working in private industry for three different utility
15 companies. In 1973 and 1974, I was employed by Central
16 Alaska Utilities, a water company in Anchorage, Alaska, as
17 the Executive Secretary to the President of the company.
18 From 1982 until 1987, I was employed as a Customer Service
19 Representative for Idaho Power Company in Salmon, Idaho.
20 From February 1989 until November 2002, I was employed by
21 Intermountain Gas Company in Customer Services. During my
22 last six years at Intermountain Gas, I supervised
23 representatives at the Customer Service Center's Emergency
24 Answering Service.

25 I received a Bachelor of Arts Degree in

1 Management and Organizational Leadership from George Fox
2 University in Boise, Idaho in June of 2002.

3 In June 2003, I attended the National Low
4 Income Energy Consortium Annual Conference in Sacramento,
5 California.

6 Q. Have you previously testified before the
7 Commission?

8 A. Yes, I have.

9 Q. What is the purpose of your testimony in this
10 proceeding?

11 A. I will address issues related to: 1) customer
12 comments received by the Commission regarding this case;
13 2) proposed charges and rates; 3) Staff's proposed tariff
14 revisions; 4) low-income issues, payment options, and
15 special needs customers; 5) Company operations with regard
16 to customer service; 6) customer relations, and 7) out-of-
17 cycle meter readings.

18 Q. Please summarize Staff's recommendations to
19 the Commission as discussed in your testimony.

20 A. Staff recommends that the Company be commended
21 for its Customer Assistance Referral Program (CARES) and
22 its "We Personally Care" program.

23 Staff also recommends that:

24 1) the Company's proposed charges for
25 reconnection of seasonal gas customers

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and after hours connection charges for both gas and electric customers be approved.

- 2) the provision in the tariffs that allows an additional \$4.00 charge to connect a second meter at the same location be eliminated.
- 3) the Company resolve its computer programming limitation issues whereby a customer currently cannot receive the benefits of the Winter Payment Plan if the customer has declared eligibility for the Moratorium.
- 4) the Company improve communication with customers about the Winter Payment Plan and the Moratorium.
- 5) the Company answer 80% of calls within 30 seconds by January of 2005.
- 6) the Company significantly reduce the number of abandoned calls per month.

CUSTOMER COMMENTS

Q. Have you reviewed the written customer comments that have been received by the Commission regarding this case?

A. Yes. As of June 18, 2004 the Commission had

1 received 31 comments as well as 4 petitions from the
2 Silver Valley area with more than 1,500 signatures. Of
3 the 31 comments, 3 were from school districts, 7 were from
4 business customers, with the remainder coming from
5 residential customers. All those commenting, as well as
6 those that signed the petitions, opposed any rate
7 increases.

8 Q. What are the concerns mentioned by customers?

9 A. The majority of those commenting (58%) said
10 that the economy in northern Idaho should be considered
11 before granting the Company any rate increases. The other
12 primary issues commenters wanted the Commission to
13 consider were: the negative impacts higher rates have on
14 fixed income individuals, senior citizens, and low income
15 customers; the concern that the Company may not have done
16 all it could to promote efficiencies from within, thereby
17 eliminating the need for a rate increase; and opposition
18 to an increase in the fixed monthly residential customer
19 charge.

20 Q. What are the economic conditions in northern
21 Idaho and how does northern Idaho compare to other areas
22 of the State?

23 A. In reviewing recent data from the United
24 States Census Bureau, some counties served by Avista in
25 northern Idaho are clearly experiencing economic distress.

1 However, the counties in northern Idaho cannot be singled
2 out as the only area of the state with poor economic
3 conditions. Several counties within the state suffer from
4 the same slow growth, high poverty rates, high
5 unemployment, and low wages.

6 As a whole, northern Idaho has a higher number
7 of individuals over the age of 65 (14.8%) compared to the
8 state average of 11.3%. Some northern Idaho counties have
9 nearly 20% of the population over 65 years of age. This
10 fact probably accounts for the number of comments from
11 Avista customers on fixed incomes concerned about being
12 able to afford higher utility rates. Staff Exhibit No.
13 149 compares some of the economic indicators for northern
14 Idaho counties with state average percentages.

15 **PROPOSED CHARGES AND RATES**

16 Q. Many comments to the Commission in this rate
17 case convey customers' opposition to the proposed increase
18 in the fixed monthly residential customer charge to \$5.00
19 for both gas and electric service. What is the primary
20 reason customers cited for opposing increased customer
21 charges?

22 A. About one-third of those commenting stated
23 opposition to increases in fixed residential customer
24 charges. Customers are generally against these types of
25 charges because the perception is they have no control

1 over them by raising or lowering the thermostat. One
2 customer from Mullen, Idaho wrote in his comments that he
3 felt basic customer charges should be abolished
4 altogether.

5 Q. Does Staff support the Company's proposal to
6 raise the gas customer charge to \$5.00 from \$3.28 and the
7 electric customer charge to \$5.00 from \$4.00?

8 A. Uniform customer charges are certainly easier
9 for customers to understand and for the Company to
10 administer. A customer with both gas and electric service
11 sees both customer charges itemized on one bill. It is
12 difficult to explain to customers why the two customer
13 charges vary, especially when purported to recover the
14 same basic costs for meter reading and billing. Although
15 Staff supports uniform customer charges, Staff does not
16 support the Company's proposed increase to \$5.00. Staff
17 witness Schunke has addressed the Staff recommendation for
18 specific customer charges in his testimony.

19 Q. Does Staff support the Company's proposed
20 changes for the cost of seasonal reconnect fees for gas
21 customers?

22 A. Yes. The Company has proposed to lower its
23 seasonal reconnect fee to \$24.00 from \$31.00 provided
24 satisfactory arrangements for payment of all proper
25 charges have been made during the hours of 8:00 a.m.

1 through 4:00 p.m. Monday through Friday, except holidays.
2 They have also proposed to increase the charge for a
3 seasonal reconnect from \$46 to \$48 after hours (4:00 p.m.
4 through 7:00 p.m. Monday through Friday, except holidays).
5 Staff supports both changes because it aligns the fees for
6 gas charges with the electric charges for the same
7 service.

8 Q. What changes have been proposed to the
9 Company's charges for new customer connections?

10 A. Avista proposes to increase its gas and
11 electric charges for connecting new customers after hours
12 to \$48 from \$32. Staff supports these changes. Avista is
13 attempting to keep charges in line with the costs to
14 provide the service.

15 Q. Are Avista's proposed reconnection fees and
16 after hours connection charges reasonable and comparable
17 with other Idaho utilities?

18 A. Yes. Staff Exhibit No. 150 provides a
19 comparison of Idaho regulated energy company reconnection
20 fees and service establishment fees. In Staff's opinion,
21 Avista's proposed charges are not out of line.

22 **STAFF'S PROPOSED TARIFF REVISIONS**

23 Q. In your review of Avista's tariffs, did you
24 find any areas of concern?

25 A. Yes. Of concern to Staff is the provision in

1 Avista's tariffs that allows for an additional \$4.00
2 charge for each additional service being reconnected the
3 same time at a premise. Staff proposes that references to
4 this charge be eliminated from Electric Tariff No. 28,
5 Sheet 70-g.1, Rule 14.3, and Gas Tariff, No. 27, Sheet
6 170-G.2, Rule 15.3.

7 Avista's usual practice is to disconnect only
8 the electric service of a customer with both electric and
9 gas service. As a result, the Company rarely needs to
10 reconnect more than one meter at a premise, and the
11 Company seldom bills an additional \$4.00. If this
12 provision were eliminated, the revenue impact would be
13 negligible. Avista collected a total of \$96.00 from 24
14 customers in 2003 for reconnecting additional meters.
15 Staff questions whether this charge is necessary if it is
16 rarely assessed, produces little revenue, and is not
17 designed to influence customers' behavior.

18 **LOW INCOME ISSUES, PAYMENT OPTIONS, AND SPECIAL NEEDS**
19 **CUSTOMERS**

20 Q. Does Staff believe Avista is doing an adequate
21 job of supporting community-based agencies with funds for
22 the purpose of helping low income customers meet energy
23 needs?

24 A. Yes. In the past four years, Avista
25 shareholders have given \$515,000 to Project Share, all of

1 which went back to northern Idaho residents for the
2 purpose of helping low income individuals meet energy
3 needs. Since Project Share is a fuel-blind fund, some
4 monies went to other energy sources such as wood, propane,
5 or oil; but, since the year 2000, Avista customers have
6 received \$563,340 from Project Share. In the past four
7 heating seasons, 2,574 Avista customers have received an
8 average of \$217 from Project Share to help with heating
9 costs.

10 Q. What options do Avista customers have if they
11 are not able to pay their bills in full?

12 A. Avista customers can make payment arrangements
13 by placing a call to the Company and asking for an
14 extension on a bill's due date or asking to set up a
15 mutually satisfactory payment plan. Avista also offers a
16 program called "Comfort Level Billing" that allows
17 customers to pay an average amount which is determined by
18 dividing the customer's projected yearly energy billings
19 by twelve months. These estimated average amounts are
20 reviewed every three months by Avista to determine if the
21 amount the customer was asked to pay each month has kept
22 in line with the projected usage. This proactive
23 procedure to review the Comfort Level Billing amount every
24 three months minimizes any surprises to customers that can
25 result from a miscalculated monthly average.

1 Customer service representatives are also
2 trained to determine if a customer might qualify to
3 receive help from the Low Income Home Energy Assistance
4 Program (LIHEAP). During the heating season of 2002-2003
5 Avista's Idaho customers received a total of \$1,134,611.

6 Another program that can benefit some low-
7 income customers during the winter months is the Winter
8 Payment Plan. During the months of December, January and
9 February, customers who declare that they are unable to
10 pay their Avista utility bills in full and also have
11 children, elderly, or infirm in the household are exempt
12 from disconnection for nonpayment. When a customer makes
13 the declaration of his or her inability to pay the bill in
14 full, the utility is required to offer the Winter Payment
15 Plan to the customer. If the customer agrees to
16 participate in the Winter Payment Plan, the protection
17 from disconnection is extended to the shoulder months of
18 November and March. Customers who agree to participate in
19 the Winter Payment Plan must pay by the due date each
20 month an amount equal to one-half of what the customer's
21 Comfort Level Billing would be.

22 Avista takes a customer's inability to pay one
23 step further with its Customer Assistance Referral and
24 Evaluation Service (CARES) program. The CARES program is
25 discussed in greater length below.

1 Q. Does Avista offer the Winter Payment Plan to
2 customers as required by the Utility Customer Relations
3 Rule 306.03?

4 A. Staff was concerned that no Avista customers
5 in Idaho participated in the Winter Payment Plan during
6 the last two heating seasons. One of the reasons may be
7 due to the Company not making available to its customers
8 any written material regarding protection from
9 disconnection during the winter months if there are
10 children, infirm, or elderly in the household and the
11 customer declares that he or she cannot pay the bill in
12 full. The Company stated that customer service
13 representatives are expected to apprise customers of the
14 program's availability if the representative determines
15 the customer is eligible. CARES representatives work
16 closely with agencies to help identify those who are
17 eligible.

18 An additional problem is caused by the fact
19 that Avista has a computer programming limitation that
20 prohibits a customer from being placed on the Winter
21 Payment Plan and receive Moratorium protection from
22 disconnection simultaneously. The Company prefers to
23 classify an eligible customer as being a Moratorium
24 participant as opposed to placing the customer on the
25 Winter Payment Plan because the Moratorium classification

1 takes the customer out of the normal credit and collection
2 work cycle and avoids the possibility that the customer
3 would be inadvertently turned off for nonpayment during
4 the winter months.

5 It is Staff's position that Avista needs to
6 resolve its computer programming problem so that customers
7 can have the opportunity to participate in the Winter
8 Payment Plan while simultaneously receiving protection
9 from disconnection afforded by declaring eligibility for
10 the Moratorium. This will also allow the Company to be in
11 compliance with the Utility Customer Relations Rules
12 (UCRR) regarding both the Moratorium and Winter Payment
13 Plan.

14 In June of this year, a task force comprised
15 of representatives from Avista, Idaho Power Company,
16 Intermountain Gas Company, Utah Power, the IPUC, Community
17 Action Partnership Association of Idaho (CAPAI), Salvation
18 Army, and Idaho Community Action Network (ICAN), met to
19 determine the best practices for informing customers about
20 the Moratorium and the Winter Payment Plan. Before this
21 coming heating season begins, the task force intends to
22 have a preferred methodology in place concerning how
23 utilities communicate with customers regarding the Winter
24 Payment Plan and the Moratorium.

25 Q. Does Avista provide any additional services

1 for customers that have special needs, such as, but not
2 limited to, those with severe disabilities or diminished
3 mental capacity?

4 A. Avista has a program entitled "Customer
5 Assistance Referral and Evaluation Service" (CARES). For
6 Idaho customers, Avista employees two specially trained
7 customer service representatives, called CARES
8 representatives. These representatives specialize in
9 helping customers who are facing hardships obtain access
10 to a wide variety of programs, including special payments
11 arrangements, and referral to agencies for the purpose of
12 assisting with more than energy bills.

13 CARES representatives in Idaho recently
14 organized an effort to collect personal care items for
15 low-income customers. Personal care items include items
16 that cannot be purchased with food stamps such as shampoo,
17 soap, toiletries, and/or paper products. Avista's program
18 is called "We Personally Care." Last year, the Avista
19 CARES representatives not only organized the drive to
20 collect the personal care items, they also located
21 churches and other facilities such as the local Community
22 Action Agencies to store and assist in the distribution of
23 the collected items. More than 6,000 pounds of personal
24 care items were collected and distributed last year.
25 Avista's worthwhile effort to reach out into the community

1 deserves high marks for exceptional community service.

2 Avista Utilities also offers free consumer
3 credit counseling through a partnership with Consumer
4 Credit Counseling Service of the Inland Empire.

5 **COMPANY OPERATIONS WITH REGARD TO CUSTOMER SERVICE**

6 Q. How does Avista compare to other energy
7 companies regarding its ability to answer incoming
8 customer service calls in a timely manner?

9 A. According to the Edison Electric
10 Institute/American Gas Association (EEI/AGA) in its 2002
11 annual data source survey, the average service level (the
12 percentage of calls answered within a defined number of
13 seconds) among the 62 reporting utility companies was
14 73.8% of calls answered in 32.3 seconds. Avista recently
15 set its internal service level goal at answering 70% of
16 incoming customer calls within 60 seconds, somewhat lower
17 than the average service levels reported by the companies
18 in the EEI/AGA survey.

19 Q. In the past four years, has the Company met
20 its goal?

21 A. In 2003, there were only three months in which
22 the Company was able to meet its goal. In 2002, the
23 Company met its goal in nine of the twelve months, and in
24 2001, the Company was able to meet its goal in three of
25 the months. The Company met its goal every month in 2000.

1 Q. Is Avista's service level acceptable to Staff?

2 A. No. The fact that the Company has been unable
3 to consistently meet its own lowered service level goal,
4 especially in recent months, is of concern to Staff.

5 Q. Why did the Company choose to lower its
6 service level from 80% of calls answered within 20 seconds
7 to answering 70% of calls within one minute?

8 A. The Company's customer service managers stated
9 that this lowered goal is not a permanent service level
10 goal. The plan is to return to a more desirable service
11 level as soon as the full complement of Customer Service
12 Representatives (CSRs) is reached. One of the primary
13 reasons to temporarily change the service level standard a
14 few years ago was to raise employee morale within the call
15 center. Before the change, managers saw CSRs leaving at
16 the end of their shifts exhausted and frustrated because
17 they were not able to meet expected goals. Managers also
18 were concerned that providing good customer service was in
19 jeopardy. That is because CSRs sometimes cut calls short
20 in an effort to process as many phone calls per day as
21 possible. By slightly lowering the standard, the CSRs
22 were given permission to concentrate on the quality of the
23 phone call rather than just the quantity of phone calls
24 answered per day.

25 Company call center managers state they are

1 still recovering from staffing issues related to past
2 financial constraints. They were unable to say
3 specifically when service levels would be raised to higher
4 levels.

5 Q. Does Staff believe that Avista's step to
6 improve employee morale in the Call Center had an effect
7 on the customer service provided to customers?

8 A. Staff's opinion is that customer service was,
9 in fact, compromised. This is evident in the number of
10 calls that were abandoned in the past few years. In 2003,
11 the average number of abandoned calls per month was 3,292;
12 in 2002, an average of 2,998 calls were abandoned; in
13 2001, the number was 3,243; and in 2000, the average
14 number of calls abandoned was 2,148 per month. (Abandoned
15 telephone calls are the number of customers that reach the
16 Company, wait on hold, and then hang up before speaking to
17 a live representative). The Company posted its worst year
18 for service levels in 2003 with an average of answering
19 only 62% of its calls within one minute. Because Avista's
20 call center operates in a virtual environment, the numbers
21 of abandoned calls cannot be isolated to identify the
22 number of calls abandoned specifically by Idaho customers.
23 The numbers cited above include abandoned calls from
24 Avista's four call centers located in Idaho, Washington,
25 Oregon, and California.

1 The Company's overall abandoned call rate points to
2 an imbalance between customer accessibility and Company
3 responsiveness. When the Company is able to decrease its
4 customers' waiting-on-hold times, the number of abandoned
5 calls will decrease.

6 Q. Regarding the Company's accessibility, did
7 Staff find any other areas of concern?

8 A. Yes. UCRR 304.02 requires utilities to
9 diligently attempt to contact a customer in jeopardy of
10 losing service due to nonpayment at least 24 hours before
11 the proposed action. Avista's current practice is to
12 provide a recorded message to meet this requirement. If a
13 live person answers the telephone, a recorded message is
14 left with whoever answers the telephone.

15 Of particular concern to Staff is that a
16 customer on the cusp of being disconnected may actually
17 answer the telephone only to hear a recorded message
18 telling him or her to "call the Company for an important
19 message." If the customer attempts to call back to the
20 Company he or she, in all likelihood, would be placed in
21 the telephone queue awaiting the next available
22 representative. This practice compounds the Company's
23 problems with respect to service levels and abandoned
24 calls by directing calls into the Call Center. It also
25 represents a missed opportunity to negotiate a payment

1 arrangement with the customer.

2 Staff does not believe this practice complies
3 with the spirit of the rule. However, the Best Practices
4 Task Force plans to address the issue soon of how to
5 improve the disconnection notification process. Both
6 Avista and Staff will be participating in the discussions.

7 Q. Does Staff have any recommendations regarding
8 Avista's service levels goals?

9 A. Yes. Staff suggests that Avista return to a
10 goal of answering 80% of calls within 30 seconds by
11 January of 2005. As an interim step, Avista can aim to
12 meet or exceed its current service level goal of answering
13 70% of calls within one minute. Staff also recommends
14 that the Company significantly reduce the number of
15 abandoned calls per month.

16 **CUSTOMER RELATIONS**

17 Q. Please describe how many and what type of
18 complaints and inquiries the Commission has received
19 regarding Avista.

20 A. The Commission received more complaints and
21 inquiries in 2001 and 2002 than in 2000 and 2003. Higher
22 rates no doubt contributed to the increase in the number
23 of complaints during 2001 and 2002. During each of the
24 last four years, complaints fell into three main
25 categories: credit and collections, billing, and rates and

1 policies. Staff Exhibit No. 151 provides a breakdown of
2 the individual complaint and inquiry categories for each
3 of the past four years.

4 Q. What did your analysis reveal regarding
5 complaints and inquiries received by the Commission in
6 2003?

7 A. The majority fell within the category of
8 credit and collections. Of the total number of complaints
9 and inquiries in 2003, 65% concerned credit and collection
10 issues. Most of those were regarding a threat of or
11 actual disconnection of service due to nonpayment of an
12 account, a clear indication that some customers continue
13 to have difficulty paying their energy bills.

14 Q. How does Avista compare with other major Idaho
15 energy companies with regard to the number of complaints
16 and inquiries to the Commission?

17 A. In three of the last four years, Avista had
18 fewer complaints and inquiries per 1,000 customers than
19 Idaho Power Company. In each of the last four years,
20 Avista had more complaints and inquiries per 1,000
21 customers than Intermountain Gas Company or Utah Power.
22 The number of complaints and inquiries per 1,000 Avista
23 customers in 2003 was 1.7. These numbers are not
24 indicative of a particular problem with Avista's customer
25 relations; however, they do reveal an obvious correlation

1 between higher rates and customers' inability to pay bills
2 in full. Staff Exhibit No. 152 shows in graph form how
3 Avista's number of complaints and inquiries per 1,000
4 customers compares to other major Idaho regulated energy
5 companies.

6 Q. Is Avista responsive to the Commission's
7 Utility Compliance Investigators during complaint
8 investigations?

9 A. Yes, Company representatives are responsive to
10 issues raised by customers and Staff and they respond in a
11 timely manner. The average length of time in which Staff
12 was able to resolve Avista's complaints in 2003 was 3.29
13 business days for electric related complaints and 3.38 for
14 natural gas related complaints. The average length of
15 time among all Idaho regulated electric customers was 3.93
16 days and 2.81 for natural gas customers.

17 Q. What observations do you have about the
18 Company's Website?

19 A. Many functions are available on Avista's
20 customer-friendly Website. Customers can sign up for
21 service, disconnect service, or transfer service using the
22 Company's Website. Bills can be received and paid online.
23 Currently, Avista does not have the ability for customers
24 to make payment arrangements online; however, this feature
25 is on Avista's project list although no definite date for

1 implementation has been determined.

2 Q. How many Avista customers in Idaho receive
3 their bills online?

4 A. Nearly 3,000 Idaho customers have signed up to
5 receive their bills online, saving the Company printing
6 and postage costs.

7 Q. Do you believe Avista provides adequate
8 customer service for non-English speaking customers?

9 A. Yes. The Company has indicated to Staff that
10 it usually has one Spanish-speaking representative on
11 shift during weekday business hours. They also offer a
12 translation service through a contracted service called
13 Language Line that is available 24 hours a day, 7 days a
14 week. At this time, the low number of Hispanic and non-
15 English speaking residents in the Idaho counties served by
16 Avista does not justify requiring the Company to provide
17 bills, notices, and/or brochures in any languages other
18 than English. It is not clear how customers in need of
19 translation services are made aware of the availability of
20 the Language Line service since those in need do not speak
21 or read English. However, the question of how best to
22 meet the needs of non-English speaking customers will be
23 addressed by the recently formed Best Practices Task
24 Force. As mentioned previously, both Avista and the Staff
25 are members of the task force.

1 Q. Did you review the Company's bills, notices,
2 forms, and other documents to ascertain compliance with
3 the Utility Customer Relations Rules (UCRR)?

4 A. Yes. Staff suggested many changes be made to
5 Avista's Rules Summary as required by Rule 701. In a
6 meeting held in June of this year, Avista and other
7 regulated energy companies asked Staff to develop a model
8 Rules Summary that could be used as a guideline by the
9 companies. Consumer Staff is currently working on a model
10 Rules Summary that should be completed and available by
11 August 2004.

12 Staff also reviewed the Company's bills,
13 notices, and forms and identified ones that were not in
14 compliance with the UCRR. The areas of non-compliance
15 were discussed with Avista and the Company agreed to
16 revise the non-compliant forms. The Company will provide
17 copies to Staff for review prior to final printing of the
18 revised forms.

19 **OUT-OF-CYCLE METER READINGS**

20 Q. In your review of Company procedures regarding
21 out-of-cycle meter reading and billing, did you find
22 anything of concern?

23 A. Yes. Avista does not physically disconnect
24 service after a customer moves and discontinues service.
25 Unless another customer moves in immediately after the

1 former customer discontinues service, this results in
2 unbilled usage not attributable to any customer. The
3 Company has also established a policy of not routinely
4 reading meters outside of regular monthly meter reading
5 cycles. A customer who establishes or discontinues
6 service on a date that does not coincide with the
7 Company's regularly scheduled meter reading will receive a
8 bill based on estimated rather than actual usage.
9 Property owners who have landlord-tenant agreements with
10 Avista and customers who move or discontinue service
11 seasonally are affected by this policy. Staff's primary
12 concern is that these customers are not receiving accurate
13 bills based on their actual usage.

14 Q. Is the Staff prepared to recommend a solution
15 to this perceived problem?

16 A. Not at this time. Due to time constraints,
17 Staff has been unable to complete its investigation or
18 explore solutions with the Company. Staff intends to
19 pursue this matter informally and, if necessary, ask the
20 Commission to address the issue formally in a separate
21 proceeding at a later date.

22 Q. Does this conclude your direct testimony?

23 A. Yes it does.
24
25

ECONOMIC INDICATORS

NORTHERN IDAHO

County & Co. Seat	Population Growth 90-00		Poverty Rate 1999		Unemployment Rate, April 2003		Average Annual Wage 2002		Persons Over 65 Yrs.		
	County	State	County	State	County	Idaho	U.S.	County	State	County	State
Benehah St Maries	15.50%	28.50%	14.10%	12.00%	10.10%	5.60%	6.00%	\$26,116	\$27,665	14.20%	11.30%
Bonner Sandpoint	38.40%	28.50%	15.50%	12.00%	7.00%	5.60%	6.00%	\$23,909	\$27,665	13.10%	11.30%
Boundary Bonners F	18.50%	28.50%	15.70%	12.00%	7.60%	5.60%	6.00%	\$24,051	\$27,665	13.40%	11.30%
Clearwater Orofino	5.00%	28.50%	13.50%	12.00%	10.20%	5.60%	6.00%	\$24,385	\$27,665	15.60%	11.30%
Idaho Grangeville	12.70%	28.50%	16.30%	12.00%	8.40%	5.60%	6.00%	\$22,957	\$27,665	17.00%	11.30%
Kootenai Coeur d A	55.70%	28.50%	10.50%	12.00%	7.20%	5.60%	6.00%	\$25,105	\$27,665	12.30%	11.30%
Latah Moscow	14.10%	28.50%	16.70%	12.00%	2.90%	5.60%	6.00%	\$22,677	\$27,665	9.50%	11.30%
Lewis NezPerce	6.60%	28.50%	12.00%	12.00%	3.50%	5.60%	6.00%	\$19,913	\$27,665	18.50%	11.30%
NezPerce Lewiston	10.80%	28.50%	12.20%	12.00%	3.40%	5.60%	6.00%	\$28,159	\$27,665	16.50%	11.30%
Shoshone Wallace	-1.10%	28.50%	16.40%	12.00%	10.60%	5.60%	6.00%	\$23,671	\$27,665	17.40%	11.30%
Average	17.62%	28.50%	14.29%	12.00%	7.09%	5.60%	6.00%	\$24,094	\$27,665	14.75%	11.30%

From the United States Census Bureau

COMPARISON OF ENERGY UTILITIES
ESTABLISHMENT OF SERVICE CHARGES

Atlanta Power

\$25 (Schedule 4, page 4)

Applies to customer establishing service for the first time at a service location

Idaho Power

\$20 for Schedules 1, 7, 9, 19, 24 & 25 (Sheet F-1, Rule F; Schedule 66, Sheet 66-2)

“Service Establishment Charge” applies to customer establishing service at a location where service is currently energized; charge does not apply to rental property covered by a continuous service agreement or non-metered service, e.g., street lighting; see list of Reconnection Charges for charges applicable to customer establishing service at a location where service is *not* currently energized

Intermountain Gas

\$14 during normal business hours; \$40 all other times (Sheet 5, Section A, 9.5)

“Account Initiation Fee” applies to each new account opened; does not apply to rental property covered by a continuous service agreement or new building or equipment turn on and safety inspections

Utah Power/PacifiCorp

\$50 from 4 to 7 p.m., Monday-Friday, except holidays; \$50 from 8 a.m. to 4 p.m., weekends or holidays (Sheets 300.1 & 3R.1)

“Service Connection Charge” applies to each new account opened; there is no charge during normal office hours, 8 a.m. to 4 p.m., Monday-Friday, except holidays

Avista

\$32 after normal business hours (Electric Tariff Sheet 70-d, Rule 6.1; Gas Tariff Sheet 170-E, Rule 6.1)

“New Customer Turn-On Charge” applies to new gas or electric customer service connection; there is no charge for establishing service during normal business hours; if gas and electric service connections are performed at same time, only one \$32 charge applies

COMPARISON OF ENERGY UTILITIES

RECONNECTION CHARGES

Voluntary or Seasonal Disconnection

Atlanta Power

Same as reconnection fees for involuntary disconnections

Idaho Power

Same as Service Connection Charge (service not currently energized)

Intermountain Gas

Same as reconnection fees for involuntary disconnections

Utah Power/PacifiCorp

Same as reconnection fees for involuntary disconnections

Avista

For gas service

\$31 from 8 a.m. to 4 p.m., Monday-Friday, except holidays

\$46 from 4 p.m. to 7 p.m., Monday-Friday, except holidays

\$46 weekend or holidays

\$4 for each additional meter

(Sheet 170-G.2, Rules 15.2 & 15.3)

For electric service

\$24 from 8 a.m. to 4 p.m., Monday-Friday, except holidays

\$48 from 4 to 7 p.m., Monday-Friday, except holidays

\$48 weekend or holidays

\$4 for each additional meter

(Sheet 70-g.1, Rules 14.2 & 14.3)

“Gas Service Reestablishment Charge” and “Electric Reestablishment Charge” apply if service is reestablished after voluntary or seasonal disconnection; if arrangements for reconnection made during hours of 8 a.m. to 7 p.m. weekdays, excluding holidays, reconnect will be done the same day; if arrangements made on holidays, weekends, or hours between 7 p.m. and 8 a.m. weekdays, company will reconnect the following day except in the case of medical emergencies and disconnect in error, which will be done the same day

If gas and/or electric service reestablished within 12 months of the date of voluntary or seasonal disconnection, customer must also pay monthly minimums for months during which service was disconnected

COMPARISON OF ENERGY UTILITIES

RECONNECTION CHARGES

Involuntary Disconnection

Atlanta Power

\$25 for customers disconnected for a period of 30 days or less; \$200 for customers disconnected for more than 30 days (Schedule 4, page 4)

Idaho Power

Schedule 1, 7 & 9

Connect/reconnect on weekdays

\$20 for customer request from 7:30 a.m. to 6 p.m.

\$45 for customer request from 6:01 p.m. to 9 p.m.;

\$80 for customer request from 9:01 p.m. to 7:29 a.m.

Connect/reconnect on weekends & holidays

\$45 for customer request from 7:30 a.m. to 9:00 p.m.

\$80 for customer request from 9:01 p.m. to 7:29 a.m.

Schedule 15, 19, 24, 25, 40, 41 & 42

Connect/reconnect on weekdays

\$40 for customer request from 7:30 a.m. to 6 p.m.

\$65 for customer request from 6:01 p.m. to 9 p.m.;

\$100 for customer request from 9:01 p.m. to 7:29 a.m.

Connect/reconnect on weekends & holidays

\$65 for customer request from 7:30 a.m. to 9:00 p.m.

\$100 for customer request from 9:01 p.m. to 7:29 a.m.

(Sheet F-1, Rules F; Schedule 66, Sheet 66-3)

“Service Connection Charge” applies to customers who are establishing service or requesting reconnection of service at a premise where service is not currently energized

Intermountain Gas

\$20 for reconnections performed during normal business hours (8 a.m.- 5:00 p.m., Monday- Friday, except holidays); \$40 all other times (Sheet 5, Section A, 9.4)

“Reconnection Charge” applies to reconnection performed after customer is disconnected involuntarily

(See next page for more information)

Utah Power/PacifiCorp

\$25 during hours of 8 a.m. to 4 p.m., Monday-Friday, except holidays

\$50 from 4 to 7 p.m., Monday-Friday, except holidays

\$50 from 8 a.m. to 4 p.m., weekends or holidays (Sheets 10R.7, 10R.8 & 300.2)

“Reconnection Charge” applies to reconnection performed after customer is disconnected involuntarily; if arrangements or payment made during hours of 8 a.m. to 7 p.m. weekdays, excluding holidays, or 8 a.m. to 4 p.m., weekends and holidays, reconnect will be done the same day; if arrangements made at other times, company will reconnect the following day, except in the case of medical emergencies and disconnect in error, which will be done the same day

AvistaGas & electric service

\$24 during hours of 8 a.m. to 4 p.m., Monday-Friday, except holidays

\$48 from 4 to 7 p.m., Monday-Friday, except holidays

\$48 weekends or holidays

\$4 for each additional service connection made at same time

(Gas Tariff Sheet 170-G.1, Rules 15.1 & 15.3; Electric Tariff Sheet 70-g.1, Rules 14.1 & 14.3)

“Reconnection Charge” applies to reconnection performed after customer is disconnected involuntarily; if arrangements or payment made during hours of 8 a.m. to 7 p.m. weekdays, excluding holidays, reconnect will be done the same day; if arrangements made on holidays, weekends, or hours between 7 p.m. and 8 a.m. weekdays, company will reconnect the following day except in the case of medical emergencies and disconnect in error, which will be done the same day

**AVISTA COMPLAINTS
2000-2003**

	2000		2001		2002		2003	
	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric
Credit & Collection	2	107	3	131	2	129	1	105
Line Extension/Installation	0	2	3	3	0	6	0	3
Service Outage/Repair	0	1	0	7	0	1	0	5
Billing	4	17	7	23	4	25	5	24
Rates & Policies	9	13	11	35	5	22	0	13
All Other	0	1	0	2	1	0	2	1
Total	15	141	24	201	12	183	8	151

**AVISTA INQUIRIES
2000-2003**

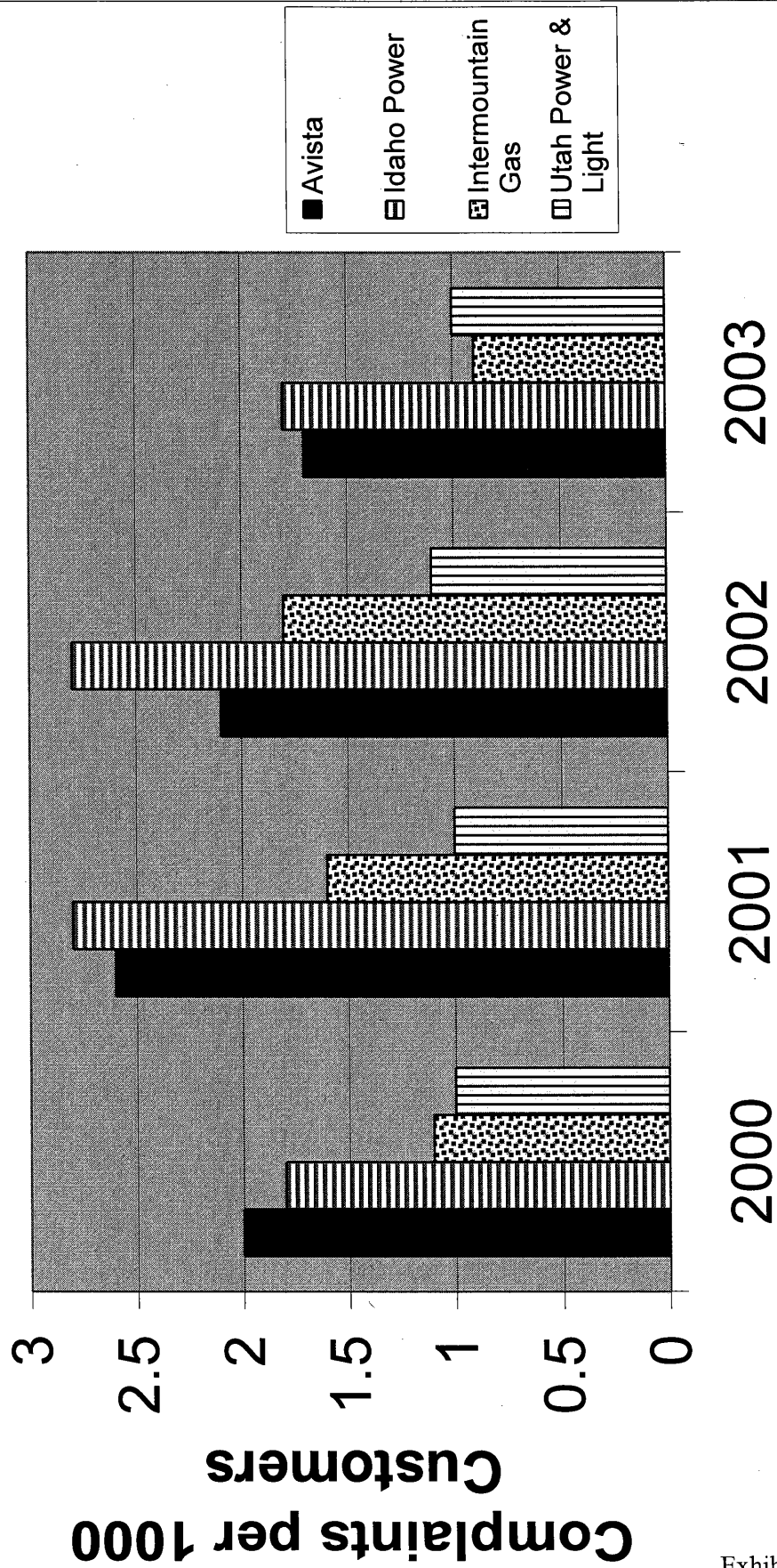
	2000		2001		2002		2003	
	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric
Credit & Collection	0	26	0	16	1	12	0	9
Line Extension/Installation	0	1	0	1	0	2	1	1
Service Outage/Repair	0	1	0	0	0	0	0	1
Billing	0	2	0	1	0	0	0	1
Rates & Policies	5	9	6	11	0	7	0	4
All Other	0	5	0	6	0	2	0	2
Total	5	44	6	35	1	23	1	18

**AVISTA COMPLAINTS & INQUIRIES
2000-2003**

	2000		2001		2002		2003	
	Gas	Electric	Gas	Electric	Gas	Electric	Gas	Electric
Complaints	15	141	24	201	12	183	8	151
Inquiries	5	44	6	35	1	23	1	18
Total Contacts	20	185	30	236	13	206	9	169
Grand Total Gas & Electric	205		266		219		178	

Exhibit No. 151
Case No. AVU-E-04-1/
AVU-G-04-1
M. Parker, Staff
6/21/04

Complaint & Inquiry Comparison by Utility on a Per 1000 Customer Basis



CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 21ST DAY OF JUNE 2004, SERVED THE FOREGOING **DIRECT TESTIMONY OF MARILYN PARKER**, IN CASE NO. AVU-E-04-1/AVU-G-04-1, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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SECRETARY

CERTIFICATE OF SERVICE