



PUBLIC WORKS DEPARTMENT

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IDAHO PUBLIC
UTILITIES COMMISSION

April 01, 2021

Ms. Jan Noriyuki, Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Boulevard - Building 8, Suite 201-A
Boise, ID 83714

SUBJECT: Idaho Public Utilities Commission Case #INT-G-21-02; Written Comments

(Submitted Electronically)

Dear Ms. Noriyuki,

The City of Boise ("City") submits the following comments on Intermountain Gas's application for continued deferral of Western Union customer payment transaction costs. The City recommends the Commission extend the authority granted in Order No. 34099 to continue deferring to a regulatory asset the costs associated with in-person customer payment transactions handled by Western Union and continue to allow the recovery of these costs through the Purchased Gas Adjustment.

An estimated 4.9% of households in Boise are unbanked, lacking access to a checking or savings account, up from 2.6% in 2015. Additionally, more than 7% of households are underbanked, relying on costly alternative financial services (2019 FDIC Survey of Household Use of Banking and Financial Services). It is critical for customers without reliable access to traditional financial services to have convenient, safe, and affordable options to pay their residential natural gas bills. The City recognizes the effort and importance Intermountain Gas has placed on being available to customers through their website, phone, and mailings as well as a commitment to payment flexibility during the COVID-19 pandemic. Alternative payment methods help ensure equitable access to and maintenance of utility services.

In light of the unprecedented economic situation many households experienced over the past 12 months and the increasing proportion of customers lacking access to checking and savings accounts, the City recommends the Commission take the necessary steps to ensure in-person bill payment transactions at Western Union continue uninterrupted until costs can be assessed at Intermountain Gas's next rate case.

If you have any questions or need additional information, please contact the Climate Action Division of the Department of Public Works at (208) 608-7150.

cc: Lori Blattner, Intermountain Gas
Preston Carter, Givens Pursley
Kendra Hoffman, Givens Pursley