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IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for Intermountain Gas Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF COMMISSION)	CASE NO. INT-G-22-01
STAFF’S FORMAL COMPLAINT)	
CONCERNING INTERMOUNTAIN GAS)	REQUEST FOR EXTENSION OF
COMPANY’S PRACTICES OF ALLOWING)	TIME TO ANSWER THE FORMAL
UNQUALIFIED OPERATORS TO)	COMPLAINT
PERFORM LIVE METER EXCHANGES)	
)	

Pursuant to Commission Rule of Procedure 56, IDAPA 31.01.01.56, and the inherent authority of the Commission, Intermountain Gas Company (“Intermountain Gas”) respectfully submits the following Request for Extension of Time to Answer the Formal Complaint.

On March 3, 2022, Intermountain Gas received a summons from the Commission in this matter. The summons requires Intermountain Gas to file an answer to the Complaint within twenty-one days, making the answer due on March 24, 2022.

Intermountain Gas has been in communication with Commission Staff regarding the subject matter of the Complaint for a number of months. These communications have included, among other things, the steps Intermountain Gas has taken to address issues identified in the Complaint.

Shortly after receiving the summons, Intermountain Gas and Commission Staff begin exploring possible settlement of the case. A settlement conference was held on Monday, March

14. While the parties did not reach agreement during that conference, the parties believe that further settlement discussions are warranted.

Intermountain Gas respectfully submits that a pre-answer settlement—subject, of course, to the parties’ agreement and the Commission’s review and approval—would provide an optimal resolution of this case. Intermountain Gas would prefer to devote time and energy towards a mutually agreeable solution rather than researching and drafting legal and factual argument. In addition, pre-answer settlement discussions would allow the Company and Commission Staff to discuss and possibly refine any remaining areas of dispute, which could in turn inform the contents of the Company’s answer.

The parties diligently pursued resolution of the Complaint. However, it does not appear possible to schedule a settlement conference with a realistic hope of submitting a final settlement agreement to the Commission by Friday, March 18, as would be necessary for the Commission to consider any settlement agreement before the Company’s answer is due.

In addition, Counsel for Intermountain Gas is out of the office during the week of March 21-25, which precludes filing an answer on short turnaround if the parties are not able to reach a settlement agreement in the interim.

Under Commission Rule of Procedure 56, the Commission has broad discretion to determine the process by which formal complaints are considered. *See* IDAPA 31.01.01.54.05 (“The Commission shall determine how a formal complaint should be processed . . .”). This discretion is broad enough to extend the original twenty-one day respond period, which itself is not required by rule.

Under the circumstances, Intermountain Gas respectfully requests that the deadline to answer the Complaint be extended by thirty days, making a response due on April 25, 2022.

This will allow the parties to explore settlement, while avoiding the need to request a second extension.

For these reasons, Intermountain Gas respectfully requests that the Commission issue an order:

1. Extending the time for the Company to file an Answer to the Complaint for thirty days, making the answer due on April 24, 2022; and
2. Any other relief the Commission deems just and proper.

DATED: March 16, 2022.

GIVENS PURSLEY LLP



Preston N. Carter
Attorneys for Intermountain Gas Company

CERTIFICATE OF SERVICE

I certify that on March 16, 2022, a true and correct copy of the foregoing was served upon all parties of record in this proceeding via electronic mail as indicated below:

Commission Staff

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