DIRK KEMPTHORNE – Governor KARL B. KURTZ – Director R. Scott Cunningham – Administrator STATEWIDE SELF RELIANCE PROGRAMS 450 West State Street, 2nd Floor P.O. Box 83720 Boise, Idaho 83720-0036 PHONE 208-334-5815 FAX 208-334-5817

November 21, 2002

Idaho Public Utilities Commission P.O. Box 83720 Boise, Idaho 83720-0074

RE: Comment on Case No. GNR-U-02-1. Order No. 29145

Dear Commissioners Kjellander, Smith and Hansen:

The Bureau of Benefit Program Operations within the Department of Health and Welfare (DHW) has reviewed Case No. GNR-U-02-1, Notice of Modified Procedure, Order No. 29145, to implement a two-year pilot Winter Protection Program that establishes minimum monthly payments during the winter moratorium (December – February). DHW staff, representatives from the Idaho Public Utilities Commission (IPUC) staff, Community Action Agencies and utilities have been participating in a work group addressing issues associated with winter heating bills.

Through this cooperative effort, a balance was sought to ensure low-income (self-declared up to 150% of the federal income guidelines) Idahoans receive protection from winter disconnect while continuing to make minimum monthly payments. Minimum monthly payments encourage self-sufficiency and personal responsibility by developing good payment habits. Customers making minimum payments during the moratorium period are also less likely to face unmanageable large utility bills on March 1st. One critical element of the Winter Protection Program will be ongoing communication between customers and their utilities. Communication will help ensure payment consideration is given to low-income households whose circumstances might otherwise lead to their termination of service.

DHW supports the proposed two-year pilot program and encourages utilities to participate for statewide continuity and to provide outcome data that can be analyzed at the end of the pilot period.

Thank you for the opportunity to comment on this Notice of Modified Procedure.

Philip Gordon, Chief

Sincerely,

CC:

Bureau of Benefit Program Operations

Michael E. Huntington, Intermountain Gas Company