

# INTERMOUNTAIN GAS COMPANY

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

RECEIVED

2019 SEP 10 PM 12:18

IDAHO PUBLIC UTILITIES COMMISSION

September 10, 2019

Ms. Diane Hanian  
Commission Secretary  
Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, ID 83720-0074

RE: Intermountain Gas Company Comments in Case No. RUL-U-19-01

Dear Ms. Hanian:

Intermountain respectfully submits the following comments regarding the proposed rule changes outlined in Case No. RUL-U-19-01.

### 31.21.01 – CUSTOMER RELATIONS RULES FOR GAS, ELECTRIC, AND WATER PUBLIC UTILITIES (THE UTILITY CUSTOMER RELATIONS RULES)

#### Section 310.01.a

In subsection (a) of Rule 310.01, the Commission proposes striking the language “or two (2) months’ charges for service”. Striking this language would eliminate a long-standing interpretation of this rule by both Intermountain and the Commission Staff which allows the Company to begin the process for termination of service if a customer’s bill is over two months past due, but also under the \$50 threshold. It is quite common for customers that only use natural gas for space heating to owe less than \$50 for an entire summer of service. In some cases, non-payment of bills for a period of several months is due to incorrect billing information. Often, the collection notice or phone call are the triggers that prompt the customer to correct the payment issue. If the proposed strikeout is accepted, waiting for the \$50 benchmark to accrue could allow past due bills to accumulate for over six months before an issue is resolved.

Intermountain believes it is in the best interest of all customers to resolve non-payment issues as quickly as possible. Encouraging payment while past due bills are relatively small and connecting customers with payment assistance earlier helps keep bad debt expenses from growing. For these reasons, Intermountain encourages the Commission to leave the phrase “or two (2) months’ charges for service” in the final rule.

### **310. INSUFFICIENT GROUNDS FOR TERMINATION OR DENIAL OF SERVICE (RULE 310).**

**01. Termination of Service.** ~~No customer shall be given notice of termination of service nor shall the customer’s service be terminated~~ **Utilities must not terminate service or provide notice of intent to terminate service if the unpaid bill cited as grounds for termination is:** (4-2-08)

**a.** ~~The customer’s unpaid bill totals less than fifty dollars (\$50) or two (2) months’ charges for service, whichever is less.~~ (4-2-08)

Section 401.02

The Commission proposes striking the language “in connection with the subject matter of the complaint” in section 401.02. If approved, this revision would introduce some ambiguity into the rule regarding the utility’s ability to terminate service in the situation where the customer stops paying all bills, not just disputed amounts, during the complaint process. Although the rule as proposed would state that “The utility may continue to issue bills and request payment from the customer of any undisputed amounts,” it is unclear if the utility would still be permitted to terminate service for non-payment of bills unrelated to a pending complaint.

Because complaints can sometimes take a significant amount of time to go through the Commission process, the customer could potentially accrue a large balance if they continued to receive service without paying the bills related to that service during the time a complaint is pending. Additionally, this change might encourage customers to file frivolous complaints in order to avoid paying bills.

Intermountain encourages the Commission to leave the phrase “in connection with the subject matter of the complaint” in the final rule.

**02. Procedure on Review Termination of Service – Undisputed Bills.** ~~The Commission will process these requests as informal complaints pursuant the Commission’s Rules of Procedure, IDAPA 31.01.01.000 et seq. Utility service shall must not be terminated nor termination be threatened by notice or otherwise in connection with the subject matter of the complaint while the complaint is pending before the Commission so long as the customer continues to pay all amounts not in dispute, including current utility bills. Upon request by any party, the parties and a representative of the Commission shall be required to meet and confer. The utility may continue to issue bills and request payment from the customer of any undisputed amounts.~~ (7-1-93)

If you should have any questions regarding these comments, please contact me at (208) 377-6015.

Sincerely,



Lori A. Blattner  
Director – Regulatory Affairs  
Intermountain Gas Company

Enclosures

cc: Mark Chiles  
Preston N. Carter