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June 25, 2013

***VIA ELECTRONIC FILING
AND HAND DELIVERY***

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84145

Attention: Gary Widerburg
Commission Secretary

Re: Docket No. 13-035-T08
Electric Service Regulation No. 3 – Electric Service Agreements

On April 15, 2013, Rocky Mountain Power proposed adding language to Electric Service Regulation 3 to indicate customers will be responsible for reasonable court costs, attorney's fees and/or collection agency fees incurred in the collection of unpaid debt following the due date of their closing bill. This would allow the collection agency to assess fees incurred in the collection of debt directly to the responsible customer as opposed to having it subsidized by all other customers.

On June 11, 2013, the parties attended a technical conference where Rocky Mountain Power gave a presentation providing information on how and when a customer's account is assigned to a collection agency, as well as how the tariff change would affect the assignment process. Rocky Mountain Power is submitting with these Comments a copy of the presentation provided during the June 11, 2013 technical conference, updated on June 20, 2013 with regard to questions and comments raised during the technical conference. This updated presentation was provided via email to the technical conference participants on June 20, 2013.

Some of the keys points discussed in the presentation and technical conference are:

- Only inactive, closed accounts, with unpaid balances are assigned to a collection agency.
- Collection agencies will add their fee to the outstanding debt required from the former customer.
- Rocky Mountain Power customers will no longer subsidize the collection agency costs in their rates.
- Over the next four years, this is an estimated savings to all customers of \$1.38M, and an additional estimated savings of over \$400,000 every year after. Savings will be phased in because Rocky Mountain Power will continue to pay fees to the collection agency based on the contract in place with the collection agency prior to the tariff approval.

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- If a former customer does not submit payment for their outstanding debt to the collection agency they are also not paying the collection agency fees (nor is the Company paying the collection agency fees).
- Former customers with unpaid debts may re-apply for and receive service with the company upon the payment of outstanding balance without paying collection agency costs.

Rocky Mountain Power appreciates the opportunity to review this proposal with the interested parties. Rocky Mountain Power continues to believe this proposal is in the best interests of our customers and reiterates our request for approval of the proposed changes to Schedule 3.

Informal inquiries may be directed to Barb Coughlin, Director, Customer & Regulatory Liaison, at (503) 331-4306.

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation & Government Affairs

Enclosures

cc: Division of Public Utilities
Office of Consumer Services