



Avista Corp.

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Public Utility Commission of Oregon
201 High St SE
Suite 100
Salem, OR 97301

RE: AR 602 – Round 2 Disconnect Reporting Comments of Avista Utilities

Mr. Boyle:

Avista Utilities continues to appreciate Staff’s collaborative effort to develop a set of proposed rules for possible disconnect reporting requirements in the state of Oregon. Avista remains supportive of the reporting of disconnect and other low-income information, so long as the information is used by those receiving it, and is valuable in terms of what the information will be used for. The comments provided herein are in response to the request for written comments following the stakeholder workshop held on July 12, 2017.

Avista maintains some reservations about the usefulness and value of the proposed reporting requirements. While some parties provided reasonable explanations as to the value of the reporting discussed, the main purpose of the reporting still seems to be for stakeholders to receive general information on the status of disconnects in Oregon. If this is the primary purpose of the reporting, as it appears to be at this stage, the Company does not believe that a rule is likely necessary to accomplish this goal. Avista is willing to provide this information upon any reasonable request it receives.

In terms of the usefulness of the reports to Avista, the reports may be informative on an annual basis, but would provide little value beyond that. In all likelihood, the Company would briefly review the annual company-wide disconnect information for each utility submitting the report, but no further detail by geographic area if provided.

Regarding the frequency of the reporting if required, the Company believes that semi-annual reports, which include monthly data, would be sufficient. The primary reason discussed for the reporting being more frequent than annually or semi-annually was to determine if energy assistance funding should be moved from one area to another, based on the need in an individual area. The Company does not believe disconnect reporting is the best gauge to determine if

assistance funds should be moved from one area to another, as by the time the reporting is submitted and reviewed, even if quarterly, the moving of funds may no longer be necessary. A better barometer of the need to move funds around is information provided directly from the Community Action Agencies (Agencies) that administer the funding. The Agencies are the front-line in working with customers that need assistance and in determining if they have enough resources to meet the needs or not. Keith Kueny from the Community Action Partnership of Oregon explained during the workshop that funds can indeed be moved between Agencies and that this has been done in the recent past for the City of Ontario. The decision to move funds in this case was done so absent the review of disconnect information. The addition of regular disconnect reporting does not appear to enhance or alter the Agencies abilities to transfer funds to one another.

For the timing of reports, whether annual, semi-annual, or quarterly, Avista recommends the reports be based on the calendar year with each report due 30 days after the end of the reporting period.

Because the usefulness and value of the proposed reporting is still unclear, Avista would propose a sunset clause in a potential rule if adopted. The Company would suggest including a clause that the utilities must submit the disconnect reports for a period of three years. After the second full year of reporting Commission Staff should convene the stakeholder group to have a discussion about the usefulness of the reports, information contained in the reports, and frequency of reporting period. A decision can then be made what will happen beyond the third year of reporting: 1) the reporting requirement will continue as is; 2) the reporting requirements will continue with modifications, or 3) the reporting will no longer be required.

If the Commission moves forward with a rule requiring the reporting of disconnect information Avista is not concerned with the confidentiality of the data included in the reports. Thus far, the data reporting elements discussed would not be considered confidential to the Company. In addition, the Company is not concerned about a “Safe Harbor” provision being included in the proposed rules to allow time for the utilities to build the necessary data queries to provide the reports.

The remainder of these comments focus on the contents of the potential disconnect reports.

- What “Assistance” programs should be included?

Response: For the purposes of the disconnect reporting, the Company suggests that the reporting of disconnect information of customers who received an energy assistance grants include all customers that received an energy assistant grant from LIHEAP, rate payer funded programs (Avista LIRAP), or Company sponsored energy assistance programs (Avista Project Share) in the 12 months prior to each month of the reporting period.

- Number of days in reconnect (1 or 2) and 7 days or?

Response: Avista suggests the reports include reconnect information for customers reconnected within 1 calendar day, for customers reconnected within 2 – 7 calendar days, and for customers reconnected after 7 calendar days. These three data points will capture all customers that do get reconnected.

The Company recommends using calendar days, rather than business days, as it is a better indicator of customer behavior for reconnecting. Utilities must reconnect customer within 1 business day of satisfying any reconnect requirements, however, reporting in business days is complex and would add additional time to complete the disconnect reporting. If the Commission or other stakeholders are interested in how long it takes the utility to reconnect service after a customer has met all requirements to be reconnected, the Company recommends including two separate reconnect data points for each interval (within 1 day and 2-7 days), one for the number of customers reconnected in calendar days and the other being the average length of time for the utility to reconnect after a customer has met all reconnect requirements.

- Areas of reporting (County, city, zip, or?)

Response: Avista provides natural gas service to 40 cities within 49 zip codes and 5 counties in the State of Oregon. Avista has the capability to provide reporting based on city, state, zip code, or county; however, reporting on certain characteristics adds complexity and in some cases inaccuracy. For example, the county information is manually input when new premises are set up in the Company's Customer Information System. The data is case sensitive so any misspelling of the county name or differing format in turn leads to several more counties shown than the five the Company serves from a reporting standpoint. The Company is looking into what is possible to clean up the county names for reporting purposes in the future. If stakeholders desire disconnect information by geographic area, Avista would recommend reporting by county, albeit cautiously, due to the data accuracy and complexity of building data queries to accurately report on the five counties the Company serves.

- Reporting period versus the amount of data

Response: For consistency, Avista recommends each report include the same information, so long as the reporting is not required more frequently than quarterly.

- How should/can the winter moratorium be integrated into the report?

Response: Avista would recommend including a data point in the reporting that captures the number of days a severe weather moratorium was declared. When a severe weather moratorium is declared all customers eligible for disconnection will continue to be eligible for disconnection after the moratorium has ended. There should be little to no impact on the total number of disconnections as a result of the severe weather moratorium.

If you have any questions regarding these comments please contact me at (509) 495-2782.

Sincerely,

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