

August 14, 2017

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: AR 602 – PacifiCorp’s Informal Comments on Service Disconnect Reporting

PacifiCorp, d/b/a Pacific Power (“Pacific Power” or “the Company”) appreciated the opportunity to participate in the July 12, 2017 workshop for docket AR 602, Service Disconnection Reports for Energy Utilities.

Pacific Power submits herein the required written response to the questions discussed in the workshop.

1. Sunset Clause

Pacific Power supports a sunset clause of 24 months as it would allow for reporting that would include two heating and cooling seasons. If the proposed rule includes a sunset clause of 24 months, Pacific Power recommends that the parties in this docket hold a workshop prior to the sunset date to evaluate the value of the reporting and determine if it should remain as is, be modified, or eliminated. Pacific Power believes special consideration during any such workshop should be on the reallocation of energy assistance funds between agencies to assist customers in areas with the greatest need, specifically how the report helped facilitate such reallocation.

2. Data Confidentiality

Pacific Power recommends that reported data shall be considered non-public information. Pacific Power serves several counties across the state of Oregon and expresses concern that other parties outside of the utilities, commission and other stakeholders will utilize information to adversely target certain demographic areas.

3. What “Assistance” program should be included:

Pacific Power does not collect income information or household demographics. In order to identify possible low income customers, Pacific Power recommends reporting recipients of energy assistance from LIHEAP, OEAP, Salvation Army and the company sponsored energy assistance program (Oregon Energy Fund OEF) within the last 12 months as low income. Pacific Power does not have a consistent tracking mechanism for possible low income customer that are recipients of assistance from other organizations such as churches or non-profit organizations.

4. Safe Harbor provision

Pacific Power is not opposed to a “Safe Harbor” provision to be included in the proposed rule to allow time for utilities to develop processes or upgrade systems for reporting. Pacific Power doesn’t offer a specific timeframe but is open to further discussion on the appropriate amount of time utilities may need to implement system changes for reporting.

5. Number of days before reconnection

Pacific Power supports providing reconnection data that is meaningful. Customer behavior and circumstances surrounding reconnection vary greatly and are not always directly associated with energy assistance funds. Further, Pacific Power notes that a delay in reconnection of service may not be financially based and could result from other situations such as move in/move out. However, Pacific Power does not oppose providing some information regarding the reconnection of service for customers. Pacific Power proposes reconnection periods to include same day reconnection, next day reconnection, and reconnection occurring between 2 – 7 days after disconnection. Pacific Power recommends reporting by calendar days versus business days. The requirement to report by business day would be complex and would require additional time and development of queries for reporting.

6. Areas of reporting

Pacific Power serves 189 zip codes in Oregon. To minimize the size of the report, Pacific Power is opposed to reporting by zip code. Pacific Power recommends reporting by county and grouping the county data by region. This will help establish a more uniform data reporting across the state and with all the utilities.

7. Reporting period versus the amount of data

Pacific Power recommends no more than quarterly reporting. The quarterly reporting would include monthly data on disconnections, reconnections (same day, next day, and 2 – 7 days), number of medical customers, and the number of declared weather moratorium days. The report will be provided for metered residential service.

8. Usefulness of Report

Pacific Power remains supportive of the development of a report of service disconnection as long as it adds value to the Commission and the other stakeholders to assist with the development of strategies to broaden outreach to our low income customers. Pacific Power would be interested to see if the reports facilitated reallocation of energy assistance funds to assist customers in areas with the greatest financial need.

9. How should/can the winter moratorium be integrated in the report?

Pacific Power will provide in the disconnection report the total number of declared weather moratorium days for the entire service area in Oregon. Pacific Power serves 189 active zip codes that are grouped into 26 service centers in Oregon. If a weather station reports a weather advisory for one zip code, disconnection of service due to non-payment will be cancelled for the entire geographical area for the designated service center.

Pacific Power appreciates the opportunity to comment and look forward to having further discussion regarding disconnect reporting and how it would positively impact our low income customers.

If you have any questions, please contact me at (503)813-5136.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Nottingham".

Melissa Nottingham
Customer Advocacy Manager

State of Oregon Low-Income Data Tracking Report - July 2017

County Name	Agreements ^{^2}		Disconnections		Same Day Recon		1 Day Recon		Recon 2 - 7 Day		Medical Certificates	
	NON-LI	LI ^{^1}	NON-LI	LI ^{^1}	NON-LI	LI ^{^1}	NON-LI	LI ^{^1}	NON-LI	LI ^{^1}	NON-LI	LI ^{^1}
BENTON	30,562	469	25	1	4	1	2	0	3	0	12	8
CLATSOP	20,940	71	46	1	5	1	15	0	5	0	13	0
COOS	22,435	288	2	0			1	0			39	4
CROOK	7,093	151									10	1
DESCHUTES	52,348	741	20	0	8	0	2	0	3	0	32	8
DOUGLAS	37,377	691	43	0	6	0	7	0			86	16
GILLIAM	382	4									3	0
HOOD RIVER	6,347	12	3	0	2	0	1	0			2	0
JACKSON	82,202	1,709	70	2	17	0	10	0	5	0	129	27
JEFFERSON	8,092	307	25	1	4	0	4	0	1	0	15	6
JOSEPHINE	37,280	1,175	56	1	7	0	10	0	4	1	62	23
KLAMATH	29,900	611									76	13
LAKE	1,837	1									10	0
LANE	6,956	78	2	0							7	0
LINCOLN	10,427	171	7	0			1	0	1	0	9	2
LINN	43,659	1,305	57	1	13	0	6	1	4	0	70	17
MARION	10,848	61	4	0	1	0	1	0			26	2
MORROW	21	0										
MULTNOMAH	71,689	783	69	1	25	1	19	0	9	0	85	16
POLK	13,040	69	16	0	3	0	4	0	1	0	26	1
SHERMAN	687	0	3	0			1	0	1	0	1	0
TILLAMOOK	92	0										
UMATILLA	14,613	336	60	2	21	2	6	0	4	0	12	3
WALLOWA	4,044	34	1	0							7	0
WASCO	595	4										
TOTAL	513,466	9,071	509	10	116	5	90	1	41	1	732	147
TOTAL	522,537		519		121		91		42		879	
			% Disconnected (Agreements)		% Reconnected (Disconnected)		% Reconnected (Disconnected)		% Reconnected (Disconnected)		% Medical (Agreements)	
			0.10%		23.31%		17.53%		34.71%		0.17%	

Weather Moratorium Days in the Period:	2
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^{^1} Low income Agreements are agreements for customers that have received an energy assistance payment within the past 12 months.

^{^2} Agreements are individual metered services active during any portion of the report month. Customers can have multiple agreements on an account. Customers can also have multiple accounts.