

**From:** Nottingham, Melissa  
**To:** [Karla Wenzel](#); [Aschenbrenner, Connie](#); ["Bonfield, Shawn"](#); [King, Onita](#); [BOYLE, Phil](#); [Siores, Natasha](#); ["Keith Kueny"](#); [Jenks, Bob \(Oregon CUB\)](#); ["Samuel Pastrick"](#); ["Herner, Del"](#); ["Gross, Jennifer"](#); [Spires, Charity](#); [Kelly Gilgan](#); [Peter Davis](#); [White, Tami \(Idaho Power\)](#); [Hoffman, Jason](#); [Mary Widman](#)  
**Cc:** ["Beth Vargas Duncan"](#); ["ELLIOTT Dan \\* HCS"](#); [KAUFMAN David \\* HCS](#); [DAVIS Diane](#); [RIEMENSCHNEIDER Johanna](#); ["tcase@oreca.org"](#); ["Wendy Gerlitz"](#); [Kalia Savage](#); [Mary Widman](#)  
**Subject:** AR 602 Pacific Power's Comments on Proposed Data Points  
**Date:** Monday, October 2, 2017 2:52:30 PM

---

Phil,

Pacific Power has reviewed the additional comments provided by your email dated September 19, 2017 for docket AR 602, Service Disconnection Reports for Energy Utilities.

Pacific Power submits herein the requested written response to the following proposed data points:

1. Purpose of the Rule

Pacific Power remains supportive of the development of a report of service disconnections for nonpayment. The comments referred to involuntary disconnects which can include safety disconnects. This appears to be beyond the scope of the rules' intent. The Company would also like to be included and/or notified of any strategies developed by the Commission and/or the other stakeholders to broaden the reach of assistance dollars to low income households.

2. Reporting Frequency

Pacific Power agrees with quarterly reporting organized by month. Whenever the reporting process begins, the company is requesting calendar year quarterly reporting.

3. Low-Income Recipient Definition

As previously noted, Pacific Power supports defining low income customers as those customers who have received an energy assistance payment within the prior twelve months.

Pacific Power does not have a consistent tracking mechanism for recipients of assistance from other organizations such as churches or other non-profit organizations. As an example, an Oregon agency are able to obtain funding from LIEAP, OEAP, and Oregon Energy Fund. The company receives a pledge and subsequent payment from an agency, but it is not necessarily coded or identified as coming from any of the aforementioned sources. Pacific Power requests consideration of this requirement since it may skew the dollar amounts reported.

4. Sunset Date

Pacific Power requests the reviewing the efficacy of the report in three years which falls within the no later than five year guideline of ORS. 183.406 (1)

5. Data Points

Pacific Power will be able to provide the data points with the exception that "involuntary" disconnection is limited to customers disconnected for nonpayment.

Pacific Power is concerned with the accuracy and the value of reporting reconnections

greater than seven days after the power was disconnected.

After five working days, Pacific Power closes the disconnected account and provides a final bill for energy used through the disconnect date in addition to any other balances owed.. The majority of the customers still living in the home when the power is turned off, contact the company within the first day or two, requesting information on what is needed to turn the power back on. There are times when a customer will not contact the company, for example the customer moves, stops paying the bill, and leaves the home vacant. Depending on the timeframe as to when a customer calls to restore service, the customer may be treated as an applicant for service as opposed to a reconnection. It would be problematic to associate the same customer to an address twenty to thirty days after the power was disconnected and the account had received a final bill. The company request consideration on eliminating this data point.

#### 6. Geographic Reporting Area

Pacific Power requests to report geographically by county. The agencies providing energy assistance to our customers have territories based on counties and this dynamic has not changed in many years. Oregon has retained the same agencies covering the same counties for LIEAP and OEAP funds. It makes sense to match the number of disconnects by county which would readily identify the applicable agency administering funds.

Pacific Power appreciates the opportunity to comment and respectfully submits these comments for consideration.

If you have any questions, please contact me.

Sincerely,

**Melissa Nottingham**

Manager, Customer Advocacy and Tariff Policy  
825 NE Multnomah St, Ste. 2000  
Portland, Oregon 97232  
503.813.5136 Work  
971.280.0927 Cellular

**\*\*\*Please use caution when opening links, attachments or responding to this email as it originated outside of PUC.\*\*\***