

October 12, 2016

***VIA ELECTRONIC FILING***

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

Attn: Filing Center

**Re: AR 601 – PacifiCorp’s Comments**

PacifiCorp, d/b/a Pacific Power (“Pacific Power” or “the Company”) appreciated the opportunity to participate in the September 28, 2016 workshop for docket AR 601, Severe Weather Moratorium. Pacific Power is providing suggested rule language and the written responses to the questions discussed during the workshop.

Pacific Power proposes the following language be used for the proposed rule on severe weather moratoriums:

***OAR 860-021-XXXX, Weather Moratorium on Residential Disconnections for Non-Payment***

*A. Residential service shall not be disconnected for non-payment by an electric or natural gas utility when the National Weather Service forecasts a high temperature of 32 degrees Fahrenheit or below for the proceeding 24-hour period.*

*B. Residential service shall not be disconnected for non-payment by an electric utility when the National Weather Service forecasts a high temperature of 100 degrees Fahrenheit or more at any time in the proceeding 24-hour period.*

*C. Forecast temperatures will be gathered by the electric or natural gas utility using localized National Weather Service station data prior to 8:00 A.M. on the morning of the proposed disconnection.*

Question 1: Should the rule allow each utility the discretion to formulate its own plan incorporating minimum standards to be set by rule or should the Commission prescribe the severe weather moratorium standard?

Each utility has a slightly different approach towards disconnections during extreme hot or cold temperatures. The purpose of establishing a severe weather rule is to create consistency within the regulatory framework for all utilities. Prescribing a temperature threshold provides a standard throughout the state which is easier for the Company to implement and easier for our customers to understand. Furthermore, Pacific Power believes an administrative rule with specifically

defined temperature thresholds should also include detail on how and when the forecasted temperature is obtained by each utility.

Question 2: Should there be different triggers for different geographic areas (e.g. Eastern Oregon vs Western Oregon vs Southern Oregon)?

Pacific Power provides service to customers throughout the State of Oregon, with service territories subject to diverse temperature ranges and topography. The Company prefers one temperature “trigger” for the state as a whole. It achieves the intent of the rule, and protects customers from the potential hazard of having disconnected service during times of severe weather.

Question 3: What are the appropriate winter and summer temperature triggers?

Staff’s initial draft rule language included two thresholds for cold temperatures and two thresholds for hot temperatures, measured over the course of one day or two consecutive days. As discussed by all parties in the workshop, having one temperature threshold for hot and cold is preferred and easier to administer. Pacific Power’s draft language reflects the removal of a threshold for two consecutive days.

While Pacific Power has seen no compelling evidence that supports a particular temperature threshold over another for the purpose of reducing life threatening situations from extreme weather, the Company’s draft language for the severe weather moratorium rule uses 32 degrees and 100 degrees as the cold and hot temperature thresholds. Pacific Power is currently reviewing weather data for the different territories served by the Company to identify the impact these thresholds might have. We anticipate having further discussion on this particular matter and we reserve the right to change our position on the temperature threshold when taking into account additional weather data, hearing from the other parties and further defining what “severe” weather means.

Question 4: Should a period of time trigger be met before a moratorium is initiated (e.g. 24 hours, 48 hours)?

Pacific Power suggests assessing the weather forecast prior to 8:00 am each day to determine if the severe weather moratorium will be instituted, and reevaluating the forecast at the same time each morning the Company is allowed to disconnect power. Using a set time each day allows for changes in forecast and is a more accurate predictor than a 48-hour outlook.

Question 5: How long should the moratorium remain in effect and under what conditions should it end?

As noted in response to Question # 4, Pacific Power believes a moratorium on disconnection of service for non-payment should be handled on a daily basis on the morning of the pending disconnection. The Company intends to cease disconnecting power for the remainder of the day

based on the forecast prior to 8:00 am. The Company will not initiate disconnection of service if the actual temperature during the day falls outside of the temperature threshold.

Question 6: Are there other circumstances under which a moratorium should be put into effect?

The establishment of a temperature threshold does not prevent nor discourage Pacific Power from continuing the practice of cancelling disconnections during flooding, storms, wildfires, or any other condition endangering the safety of customers, the public, or a Company employee. The utility has used this discretion previously for a variety of circumstances and does not believe it necessary to include in this rule every scenario which may result in the cessation of disconnecting power.

Question 7: What will it cost utilities to implement a severe weather program?

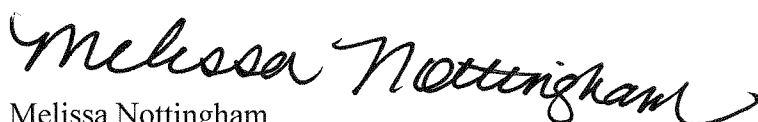
Pacific Power currently suspends disconnection of service for non-payment in the event of extreme weather or a local condition threatening the safety of our customers, employees and the public. This is done manually with local managers and our call center. If a rule is established with temperature thresholds, the Company will continue to handle the suspension of disconnection on a manual basis and anticipate dedicating one FTE for approximate 1.5 hours per day Monday to Thursday to review forecasted temperature data. Pacific Power has more than 200 different zip codes and will require pulling data from approximately 50 National Weather Service stations to determine if the temperature meets the required “trigger.”

The Company may choose to automate this particular process at a later time. The automation of this process would be complex and the initial estimate today is upwards of \$300,000. Please keep in mind this is without an established rule and clearly defined system requirements, and may need to be revisited if we proceed with automating this process.

Pacific Power appreciates the opportunity to comment and work collaboratively to develop a severe weather moratorium that helps protect customers from life threatening situations while avoiding negative impacts to the utilities and the ratepayers. We look forward to having further discussion regarding the temperature thresholds and how we define severe weather as it pertains to this rule.

Thank you for the opportunity to provide comments. If you have any questions, please contact Jason Hoffman at (503) 331-4474.

Sincerely,



Melissa Nottingham  
Manager, Customer Advocacy & Tariff Policy