

From: Keith Kueny
To: [Karla Wenzel](#); [Aschenbrenner, Connie](#); ["Bonfield, Shawn"](#); [King, Onita](#); [BOYLE Phil](#); ["Natasha.Siores@pacificorp.com"](#); ["Bob Jenks"](#); ["Samuel Pastrick"](#); ["Herner, Del"](#); ["Gross, Jennifer"](#); ["Nottingham, Melissa"](#); ["charity.spire@pacificorp.com"](#); ["stacy.davis@pacificorp.com"](#); [Kelly Gilgan](#); [Peter Davis](#); [White, Tami](#); ["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: RE: [External] RE: AR 602 - Idaho Power's Comments on Proposed Data Points
Date: Tuesday, October 3, 2017 9:28:40 AM

Phil,

CAPO thanks the commission for taking up such a topic when there are so many high-profile dockets subsequently. We support staff in their conclusion in the previous email on 9-19-19. Our main concern is that Zip aggregation could be an impediment to breaking out certain demographic traits. We sympathize, however, with utilities having to create overly burdensome reports. Maybe there can be a limit to the aggregation, so as not to include too large an area? Everything else in the staff response was agreeable to CAPO.

Thanks,

Keith Kueny
Energy Policy Coordinator
Community Action Partnership of Oregon
350 Mission SE
Salem, OR 97302
(503) 991-9327

From: Karla Wenzel [mailto:Karla.Wenzel@pgn.com]
Sent: Monday, October 2, 2017 2:41 PM
To: Aschenbrenner, Connie <CAschenbrenner@idahopower.com>; 'Bonfield, Shawn' <Shawn.Bonfield@avistacorp.com>; King, Onita <ork@nwnatural.com>; BOYLE Phil <phil.boyle@state.or.us>; 'Natasha.Siores@pacificorp.com' <Natasha.Siores@pacificorp.com>; Keith Kueny <Keith@caporegon.org>; 'Bob Jenks' <bob@oregoncub.org>; 'Samuel Pastrick' <samuel@oregoncub.org>; 'Herner, Del' <del.herner@mdu.com>; 'Gross, Jennifer' <Jennifer.Gross@cngc.com>; 'Nottingham, Melissa' <Melissa.Nottingham@pacificorp.com>; 'charity.spire@pacificorp.com' <charity.spire@pacificorp.com>; 'stacy.davis@pacificorp.com' <stacy.davis@pacificorp.com>; Kelly Gilgan <Kelly.Gilgan@pgn.com>; Peter Davis <Peter.Davis@pgn.com>; White, Tami <TWhite@idahopower.com>; 'Hoffman, Jason' <Jason.Hoffman@pacificorp.com>; Mary Widman <Mary.Widman@pgn.com>
Cc: 'Beth Vargas Duncan' <bvargasduncan@omeu.org>; 'ELLIOTT Dan * HCS' <dan.elliott@oregon.gov>; KAUFMAN David * HCS <david.kaufman@state.or.us>; DAVIS Diane <diane.davis@state.or.us>; RIEMENSCHNEIDER Johanna <johanna.riemenschneider@state.or.us>; 'tcase@oreca.org' <tcase@oreca.org>; 'Wendy Gerlitz' <wendy@nwenergy.org>; Kalia Savage <Kalia.Savage@pgn.com>; Mary Widman <Mary.Widman@pgn.com>
Subject: RE: [External] RE: AR 602 - Idaho Power's Comments on Proposed Data Points

Phil:

PGE also supports NWN's first suggestion and offer the following:

Purpose of the Rule : PGE believes the purpose of the rule should be written into the rule as a reference point for us not to lose track of why the utilities are reporting the data.

Reporting Frequency: PGE agrees with quarterly reporting with monthly data.

Low-Income Recipient Definition: PGE supports a broader definition that includes customers receiving one time bill payment assistance regardless of the fund so that this includes smaller agencies, churches and the like. This broader definition is hard coded into our current and future Customer Information System. Our reporting may thus, be overbroad and more encompassing, pending making changes to our CIS in 2018-2019.

Sunset Date : PGE supports Staff's approach. We note that the Staff recommended review under the cited statute allows inquiry into whether the rule has its intended effect (has furthered the objective) and whether the rule is needed.

Severe Weather Moratorium: PGE still disagrees with integrating the number of severe weather moratorium days in its quarterly reports. Examining the effect of a severe weather moratorium will require manual work to isolate the days of the moratorium in the dataset. We do not believe that this work will produce commensurate benefits.

Safe Harbor PGE looks forward to working with Staff and the Commission during the time when we are transitioning from our current CIS system to the future CIS system. Some of the required data may mean new coding in our future CIS.

Data Confidentiality PGE supports developing a way to report disconnection data that will inform stakeholders and the Commission as well as protect customers from predatory practices. We understand that we cannot control what happens to the data—including misuse by third parties-- following our reports to the Commission.

Data Points for Quarterly Report : It is our understanding that during the workshop on July 12, parties agreed to remove several data points including reporting for medical certificate customers. Pulling out this data—for medical certificate holders – would not necessarily further the objective of the rule to inform allocation and equity in distributing energy assistance. Little insight would be gained by reporting such a small subset of customers.

Companywide roll up - this data will be reported as a rollup of the entire company (in Oregon), broken down by month

1. Number of residential accounts
2. Number of involuntary disconnections
3. Percentage of residential disconnections
4. Disconnections of energy assistance recipients
5. Disconnections of Med Cert holders
6. Number of reconnections same day or next day (days 0-1)

7. Number of reconnections days 2-7
8. Number of reconnections over 7 days

Geographic reporting area – PGE supports the first two categories but not reporting number of disconnections for energy assistance recipients or med cert holders by zip code. Rather we propose reporting them as a subset of total disconnections.

Thank you,
Karla

Karla Wenzel
PGE Rates and Regulatory Affairs
503-464-8718

From: Aschenbrenner, Connie [<mailto:CAaschenbrenner@idahopower.com>]
Sent: Monday, October 02, 2017 1:22 PM
To: 'Bonfield, Shawn'; King, Onita; BOYLE Phil; 'Natasha.Siores@pacificorp.com'; 'Keith Kueny'; 'Bob Jenks'; 'Samuel Pastrick'; 'Herner, Del'; 'Gross, Jennifer'; 'Nottingham, Melissa'; 'charity.spires@pacificorp.com'; 'stacy.davis@pacificorp.com'; Karla Wenzel; Kelly Gilgan; Peter Davis; White, Tami; 'Hoffman, Jason'; Mary Widman
Cc: 'Beth Vargas Duncan'; 'ELLIOTT Dan * HCS'; KAUFMAN David * HCS; DAVIS Diane; RIEMENSCHNEIDER Johanna; 'tcase@oreca.org'; 'Wendy Gerlitz'
Subject: RE: [External] RE: AR 602 - Idaho Power's Comments on Proposed Data Points

Please take care when opening links, attachments or responding to this email as it originated outside of PGE.

Phil,

Compliance with the rule as described below does not present any concerns for Idaho Power – we also support NW Natural's first suggestion.

I have included two additional comments below to clarify how Idaho Power will report on certain data points.

Additional Comments:

- Disconnections of Med Cert holders
Because we do not have an automated field to report from for disconnection of a medical certificate holder, this data point will be manually tracked. Once Idaho Power is notified of a medical certificate, we offer a written time-payment agreement (TPA) to the customer. Pursuant to OAR 860-021-0410, if a customer fails to enter into a written TPA within 20 days of filing the certificate, or to abide by its terms, Idaho Power will notify the OPUC's Consumer Services Division of its intent to disconnect service. At that time, the account will follow the required notification process and may be disconnected. If that customer is ultimately disconnected, we don't have an automated way to determine whether or not we had originally received a medical certificate designation prior to the customer failing to enter into, or abide by the terms of, a TPA.

- Number of reconnections over 7 days
Idaho Power will always report “0” in this category. Once an account has been disconnected for 7 days, the account is “closed” – if service is reestablished by the same customer, a new account number is assigned.

Thanks,
Connie

Connie Aschenbrenner

Rate Design Manager

Idaho Power | Regulatory Affairs

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From: Bonfield, Shawn [<mailto:Shawn.Bonfield@avistacorp.com>]
Sent: Monday, October 02, 2017 2:06 PM
To: King, Onita <ork@nwnatural.com>; BOYLE Phil <phil.boyle@state.or.us>; 'Natasha.Siores@pacificorp.com' <Natasha.Siores@pacificorp.com>; 'Keith Kueny' <Keith@caporegon.org>; 'Bob Jenks' <bob@oregoncub.org>; 'Samuel Pastrick' <samuel@oregoncub.org>; 'Herner, Del' <del.herner@mdu.com>; 'Gross, Jennifer' <Jennifer.Gross@cngc.com>; 'Nottingham, Melissa' <Melissa.Nottingham@pacificorp.com>; 'charity.spire@pacificorp.com' <charity.spire@pacificorp.com>; 'stacy.davis@pacificorp.com' <stacy.davis@pacificorp.com>; 'Karla Wenzel' <Karla.Wenzel@pgn.com>; 'Kelly Gilgan' <Kelly.Gilgan@pgn.com>; 'Peter Davis' <Peter.Davis@pgn.com>; Aschenbrenner, Connie <CAschenbrenner@idahopower.com>; White, Tami <TWhite@idahopower.com>; 'Hoffman, Jason' <Jason.Hoffman@pacificorp.com>; 'Mary Widman' <Mary.Widman@pgn.com>
Cc: 'Beth Vargas Duncan' <bvargasduncan@omeu.org>; 'ELLIOTT Dan * HCS' <dan.elliott@oregon.gov>; KAUFMAN David * HCS <david.kaufman@state.or.us>; DAVIS Diane <diane.davis@state.or.us>; RIEMENSCHNEIDER Johanna <johanna.riemenschneider@state.or.us>; 'tcase@oreca.org' <tcase@oreca.org>; 'Wendy Gerlitz' <wendy@nwenergy.org>
Subject: RE: [External] RE: AR 602 - NW Natural Comments on Proposed Data Points

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Hello,

Avista also has no objections to the form and content of the reporting structure outlined. We support NW Natural’s first suggestion and we will attempt to do something similar in combining the zip codes we serve into districts when the time comes.

Thanks,

Shawn Bonfield

Sr. Regulatory Policy Analyst



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From: King, Onita [<mailto:ork@nwnatural.com>]

Sent: Monday, October 2, 2017 10:28 AM

To: BOYLE Phil <phil.boyle@state.or.us>; 'Natasha.Siores@pacificorp.com' <Natasha.Siores@pacificorp.com>; 'Keith Kueny' <Keith@caporegon.org>; 'Bob Jenks' <bob@oregoncub.org>; 'Samuel Pastrick' <samuel@oregoncub.org>; 'Herner, Del' <del.herner@mdu.com>; 'Gross, Jennifer' <Jennifer.Gross@cngc.com>; Bonfield, Shawn <Shawn.Bonfield@avistacorp.com>; 'Nottingham, Melissa' <Melissa.Nottingham@pacificorp.com>; 'charity.spires@pacificorp.com' <charity.spires@pacificorp.com>; 'stacy.davis@pacificorp.com' <stacy.davis@pacificorp.com>; 'Karla Wenzel' <Karla.Wenzel@pgn.com>; 'Kelly Gilgan' <Kelly.Gilgan@pgn.com>; 'Peter Davis' <Peter.Davis@pgn.com>; 'Aschenbrenner, Connie' <CAschenbrenner@idahopower.com>; 'White, Tami' <TWhite@idahopower.com>; 'Hoffman, Jason' <Jason.Hoffman@pacificorp.com>; 'Mary Widman' <Mary.Widman@pgn.com>
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Subject: [External] RE: AR 602 - NW Natural Comments on Proposed Data Points

Phil,

NW Natural has no objections to the form and content of the disconnect report structure as outlined in your email below. Just a couple of additional comments:

1. For data point number 2, please change the statement “number of involuntary disconnections” to “number of disconnections for non-payment.” As you know, there are a variety of reasons that a utility might involuntarily disconnect a customer – safety being one – and it should be clear that this report is specific to disconnects associated with non-payment.
2. NW Natural supports the concept of allowing zip code data to be combined into smaller community or geographic areas. Unless the reader is familiar with all of the zip codes, a user could find it difficult to decipher the data otherwise, and grouping zip codes will help to keep the size of the submitted report more manageable. NW Natural currently correlates the zip code for each customer account to the service areas defined in our Tariff, which are:

Portland, Salem, Eugene, Albany, The Dalles, Lincoln City, Coos Bay, and Astoria.

Thank you for the opportunity to provide additional comment.

Let me know if you have any questions.

Onita King
NW Natural
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From: BOYLE Phil [<mailto:phil.boyle@state.or.us>]

Sent: Tuesday, September 19, 2017 4:26 PM

To: 'Natasha.Siores@pacificorp.com'; 'Keith Kueny'; 'Bob Jenks'; 'Samuel Pastrick'; 'Herner, Del'; 'Gross, Jennifer'; King, Onita; 'Bonfield, Shawn'; 'Nottingham, Melissa'; 'charity.spires@pacificorp.com'; 'stacy.davis@pacificorp.com'; 'Karla Wenzel'; 'Kelly Gilgan'; 'Peter Davis'; 'Aschenbrenner, Connie'; 'White, Tami'; 'Hoffman, Jason'; 'Mary Widman'

Cc: 'Beth Vargas Duncan'; 'ELLIOTT Dan * HCS'; KAUFMAN David * HCS; DAVIS Diane; RIEMENSCHNEIDER Johanna; 'tcase@oreca.org'; 'Wendy Gerlitz'

Subject: AR 602 - Proposed Data Points

All,

I have read through all of your comments submitted after the AR 602 workshop in July, and I think I have sifted them down to something that is manageable. Before I try to create rule language, I wanted to run my thoughts past everyone for additional comments and suggestions.

Purpose of the Rule

First, let me address the purpose of the rule. While some are still unclear about the usefulness of a disconnect report, many seemed to accept that there is value. My initial thought was that the strongest argument in favor of the report was to provide CAPO information with which to determine when reallocation of funds between agencies might be necessary to meet the need – I still think this is a strong argument in favor of the report, but there are other reasons which may be less easy to quantify. Some of the arguments in favor included comments such as:

1. *“Access to better disconnection data will provide parties a better understanding of customer behavior, leading to better utility service and, hopefully, more precise affordability programs.”*
2. *“Without consistent and continuous reporting, CAPO and other organizations will not have all the resources available to know if program changes are effective.”*
3. *“CUB sees significant value in understanding the extent to which a disparity exists among demographic groups (low-income, etc) with regard to involuntary disconnections.”*

I also think it is a value to the PUC Commissioners to have a general idea about the number of

disconnects that occur in Oregon so they have a sense of whether utility efforts to reduce disconnections are adequate, and whether low-income energy assistance funding is making an impact. I also think the data may reveal information that we are presently unaware of - we don't know what the data may reveal.

Reporting Frequency

While some utilities expressed a preference for an annual or biennial report, most had no strong objection to providing a quarterly report with monthly data. I will propose quarterly reporting with monthly data.

Low-Income Recipient Definition

Low-income recipient will include any customer receiving LIHEAP, OEAP or any ratepayer funded bill payment assistance program within the last 12 months. Voluntary programs funded by shareholders, employees and customers will not be included.

Sunset Date

There will be no sunset date for the rule, but, consistent with ORS 183.405(1), we will have a review after the third full year to see if the report needs to be tweaked or other changes are needed.

Severe Weather Moratorium

The report should show the number of days in the quarter where a severe weather moratorium was imposed.

Safe Harbor

It was suggested that we need a safe harbor provision for utilities who may be unable to meeting the reporting requirement due to current or future CIS upgrades. I don't think this is necessary. I think the Commission can exercise enforcement discretion in these infrequent situations upon discussion with the utility. However, I am open to setting a date for submission of the initial reports that is later than the effective date of the rule to allow time for systemic changes and testing.

Data Confidentiality

Some utilities expressed a concern about data confidentiality. I do not agree that any of the data points listed below would be categorically exempt from disclosure to the public. Oregon's Public Records Law contains a limited number of exemptions from disclosure, and none appear to apply. We can't add an exemption to this statutory list with an administrative rule.

Data Points for Quarterly Report

Companywide roll up - this data will be reported as a rollup of the entire company (in Oregon), broken down by month

1. Number of residential accounts
2. Number of involuntary disconnections
3. Percentage of residential disconnections
4. Disconnections of energy assistance recipients
5. Disconnections of Med Cert holders
6. Number of reconnections same day or next day (days 0-1)

7. Number of reconnections days 2-7
8. Number of reconnections over 7 days

Geographic reporting area – this data will be included on the quarterly report for each geographic location, broken down by month (ZIP, community or Operational Unit)

1. Number of residential accounts
2. Number of disconnects
3. Disconnects of energy assistance recipients
4. Disconnects of med cert holders

Geographic Reporting Area

Most stakeholders felt reporting by ZIP code was doable, but a couple of utilities serve a large number of ZIP's potentially making such a report unwieldy. I think reporting by ZIP is the best way to understand and use the data, but I am open to consolidating ZIPs into geographic areas such as by community (over some population threshold or alternatively by utility operations center. For example, reporting by community for the Salem/Keizer area would combine 5 zip codes into a single data point. In some cases, reporting by operations center may be more useful. PAC's Medford operations center serves at least 12 zip codes, these 12 (or more) ZIPs could be reported as a single data point named Medford Operations. I am still open to other suggestions, and may add flexibility to the rule language to allow utilities to report in a manner that best suits their needs – suggestions?

Please have additional comments back to me by October 2nd, then I will complete my first draft of proposed language.

Thanks,
Phil

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