



PACIFIC POWER UTAH POWER

October 26, 2005

Oregon Public Utility Commission
550 Capitol Street NE, Ste 215
Salem, OR 97301-2551

RE: AR 500, Rulemaking to Amend OARs 860-021-0120, Meter Readings and Bill Forms, and 860-021-0405, Notice of Pending Disconnection of Residential Electric or Gas Utility Service.

PacifiCorp appreciates the opportunity to respond to the draft amendments to OAR 860-021-0120 and OAR 860-021-0405 that were presented at the September 13, 2005 Public Meeting and which opened the rulemaking for docket AR 500.

OAR 860-021-0120

PacifiCorp is generally in agreement with Staff's proposed modifications to sections 1, 2, 4, and 5 of OAR 860-021-0120. PacifiCorp does not, however, agree with Staff's proposed changes to section 3 of this rule.

The existing language of the first sentence of section 3 of the rule states that "all service meters shall, as nearly as possible, be read at monthly intervals, on the corresponding day of each meter reading period." This language accommodates the Company's practice of reading the meter "as nearly as possible" on the corresponding day of each meter reading period and takes into account situations where the day of the meter reading may vary depending upon weather, timing of weekends and holidays and workforce scheduling. The proposed language requires the utility to read the meter on the "corresponding day of each meter reading period" without taking into consideration necessary adjustments that may need to be made to the meter reading schedule. For this reason, the Company respectfully requests the language in the first sentence of section 3 of this rule remain unchanged.

PacifiCorp also recommends that a different example(s) be provided in section 3(a) describing how the utility may seek the customer's cooperation in obtaining meter readings. The Company is moving away from allowing customers to read the meter and submit a "customer read form." From the Company's experience, this option is often unreliable and does not provide accurate meter reading information. Instead, the Company relies on other solutions to obtaining a meter reading, such as installing radio frequency meters in certain situations, installing a Company-owned lock or requesting a key to a locked gate.

The proposed change to the example provided in section 3(a) would also necessitate changing the last sentence of this section to eliminate any reference to a "customer" reading. In addition, the Company proposes that language be added to the last sentence of section 3(a) to indicate that where extenuating circumstances exist, the utility will not be required to obtain actual verification of a meter reading "not less than once every four months." The Company serves remote facilities that may be inaccessible for six months or more during the year. Actual verification of meter readings is not possible in these situations. In addition, inclement weather may also prevent the energy utility from verifying a meter reading once

every four months during certain circumstances. Finally, customers may request, and the Company may agree to, read a customer's meter less frequently than once every four months. An example of this would be where the customer is in the process of moving their meter to allow access but it takes longer than four months to accomplish this.

OAR 860-021-0405

PacifiCorp supports Staff's proposed modifications to all sections of OAR 860-021-0405 with the exception of section 7.

PacifiCorp recommends that "personal contact" be expanded to include a voice message left by the Company on a customer's answering machine. Leaving a voice mail message for a customer who is not at home during the day provides the customer with notice that their service is in danger of being disconnected, which they would not otherwise have. If a customer does not receive their voice mail there is no reason to assume the customer would be at home when the utility made a personal visit to disconnect service. By allowing "personal contact" to include a voice message left on the customer's telephone, site visits will be eliminated for more customers, reducing collection activity and improving the cost effectiveness of remote disconnection and reconnection. At the same time, the voice mail message would provide the customer with notice of pending disconnection they would not otherwise have.

PacifiCorp's proposed modifications to OAR 860-021-0120 and OAR 860-021-0405 are included as Attachment A to this letter.

Thank you for the opportunity to comment,

A handwritten signature in black ink, appearing to read "D. Douglas Larson". The signature is stylized and includes a large, decorative flourish at the end.

D. Douglas Larson
Vice President, Regulation
Enclosures

Attachment A

PacifiCorp's Proposed Modifications to OAR 860-021-0120 and 860-021-0405

OAR 860-021-0120

(3) As a matter of general practice, **the energy utility will shall**, as nearly as possible, read at monthly intervals, on the corresponding day of each meter reading period. Special authority may be granted for reading the meters **less frequently than once a month at other than monthly intervals**, if the circumstances warrant or upon the customer's request if agreed to by the energy utility and the customer. **In such cases, the energy utility shall provide confirmation in a written statement which includes an explanation of the disadvantages of having the meter read and billed less often than monthly:**

(a) When access to a meter is difficult due to the meter's location or other circumstance, the energy utility **shall may** seek the customer's cooperation in obtaining **monthly** meter readings (for example, **having the customer complete and return a meter reading form** installing a utility-owned lock, using a key to gain access to a locked gate or installing a radio frequency meter). **Any customer reading shall be subject to actual verification by the energy utility not less than once every four months** The energy utility shall verify the actual meter reading not less than once every four months unless verification cannot be achieved due to extenuating circumstances including, but not limited to, inclement weather, difficult terrain or remote facilities, or unless both the customer and the energy utility have agreed to some other arrangement.

OAR 860-021-0405

(7) On the day **of or the day before** the electric or gas utility expects to disconnect service and before disconnection, the utility must make a good-faith effort to personally contact the customer or an adult at the residence to be disconnected. **"Personal contact" includes a person-to-person conversation with the customer or an adult at the residence to be disconnected. "Personal contact" also includes a telephone conversation with the customer or another adult residing at the customer's residence or a voice message left by the Company on a customer's answering machine:**