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February 24, 2021

***VIA ELECTRONIC FILING***

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

**RE: RE 189—PacifiCorp’s COVID-19 Credit and Collections Report—Oregon Deferred Payment Plan Update**

In accordance with Order No. 21-057, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) reported on the status update of the Company’s Deferred Payment Plans (DPPs) pilot in April and October 2021. As noted in PacifiCorp’s October report, PacifiCorp intends to update the DPP/TPP information included in this report on a monthly basis until April 2022. PacifiCorp hereby submits its monthly DPP update for the month of January 2022.

PacifiCorp began offering customers the ability to defer monthly installment payments early in 2020 with low participation rate. In April 2021, PacifiCorp’s Arrearage Management Plan (AMP) was launched, and customers were offered multiple payment plan options: a time payment plan (TPP), a DPP, and an equal time payment plan. Customers and employees on behalf of the customers complete an online form to apply to the AMP program, and each payment plan is explained as an option. The requests for DPPs significantly increased after the online AMP form went live in April 2021.

Customers could waive a down payment and up to three months of debt payments. Customers continue to pay current charges during the deferral period.

PacifiCorp offers customers the option to defer monthly installments on past due balances. The current billing system allows for the Company to provide this option without changes to the customer billing system. The logic for a TPP was used with the monthly installment amount set at zero dollars for the deferred months. An evaluation of billing system automation is not included in the benefit analysis of a DPP. The focus is whether a DPP is a viable option for customers to manage debt.

Summary

As of January 2022, PacifiCorp had 1,571 customers enrolled in a DPP. The average duration for the plan selected by customers was 21 months, and only 4 percent of payment plan customers opted for a DPP while 96 percent of customers opted for a traditional TPP.

Plan Type	Residential	Non-Residential
DPP	1,550	21
TPP	38,408	2,408
<b>TOTAL PLANS</b>	<b>39,958</b>	<b>2,249</b>

Reviewing the data to evaluate if the DPP is beneficial for customers, TPPs were included for comparative purposes. The data presented several challenges:

- Low participation rates and high default rate of early participants,
- DPPs are designed to have a higher arrears for longer period, and payment plans do not “default” until the account is closed or disconnected for non- payment.

To adequately evaluate the benefit of a DPP and to compare with a traditional payment plan, a review of April 2021 through October 2021 are included in the below data. Recent DPPs may still be in the deferral period, and the early defaulted plans have accumulated higher balances. Default is defined as two missed payments. A like-for-like comparison requires us to pare down the data to three months and will need to continue to report progress.

Plan Type	Average Number of Payments	Average Beginning Balance	Average Current Balance	Average Reduction in Balance	Percentage of Reduction	Default Rate
DPP	21	\$2,087	\$1,439	\$647	31.0%	75.4%
TPP	13	\$1,179	\$644	\$535	45.4%	63.0%

- The average beginning account balances for DPP customers are larger.
- The average reduction in the account balances for DPP customers are 14 percent less than TPP customers.
- The default rate for TPPs shifted from being 18 percent higher than DPPs in October 2021 to having a 12 percent lower default rate through January 2022.

#### Next Steps

DPPs continue to be offered to residential and small commercial customers and the data collection is ongoing. As the DPP’s mature more information will be available to evaluate the long-term and short-term benefits of the plan. PacifiCorp intends to update the DPP/TPP information included in this report on a monthly basis until April 2022, at which time the Company will provide a more detailed evaluation of the DPP pilot.

If you have any questions regarding this report, please contact Jennifer Angell at (503) 331-4414.

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Public Utility Commission of Oregon  
February 23, 2022  
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Sincerely,

A handwritten signature in cursive script that reads "Shelley McCoy". The signature is written in black ink and is positioned above the typed name.

Shelley McCoy  
Director, Regulations

Enclosure

**OR DPP PLANS UPDATE - FEBRUARY 22, 2022**

PLAN	RES COUNTS	COM COUNTS
DPP	1,550	21
TPP	38,408	2,408
<b>TOTAL PLANS</b>	<b>39,958</b>	<b>2,429</b>

PLAN	AVG INSTALLMENTS	AVG BEGINNING BALANCE	AVG CURRENT BALANCE	AVG REDUCTION	AVG REDUCTION %	AVG DEFAULT RATE
DPP	21	2087	1439	647	31.0%	75.4%
TPP	13	1179	644	535	45.4%	63.0%

Based on highlighted months.

## Deferred Payment Plan Data

CLASS/MONTH	COUNTS	AVG INSTALLMENTS	AVG BEGINNING BALANCE	AVG CURRENT BALANCE	PYMNTS DURING PLAN	AVG PYMNTS DURING PLAN
<b>DPP</b>	<b>1550</b>	<b>20</b>	<b>\$ 1,593</b>	<b>\$ 1,104.54</b>	<b>1,646</b>	<b>1.63</b>
202011	1	24	\$ 444	\$ 487.50	5	5.00
202012	1	16	\$ 592	\$ 497.64	5	5.00
202101	2	16	\$ 516	\$ 59.11	5	2.50
202102	1	16	\$ 236	\$ 336.02	1	1.00
202103	3	19	\$ 779	\$ -	7	2.33
202104	257	21	\$ 1,980	\$ 1,333.01	520	2.02
202105	290	20	\$ 1,946	\$ 1,279.25	470	1.62
202106	125	20	\$ 2,025	\$ 1,398.52	164	1.31
202107	53	21	\$ 2,046	\$ 1,454.91	38	0.72
202108	155	20	\$ 1,897	\$ 1,477.07	145	0.94
202109	157	21	\$ 2,509	\$ 1,559.11	109	0.69
202110	234	21	\$ 2,204	\$ 1,573.33	94	0.40
202111	88	21	\$ 2,739	\$ 2,093.53	21	0.24
202112	131	20	\$ 2,239	\$ 1,794.71	40	0.31
202201	52	19	\$ 1,736	\$ 1,224.41	22	0.42
<b>TPP</b>	<b>38408</b>	<b>11</b>	<b>\$ 795</b>	<b>\$ 384.82</b>	<b>99627</b>	<b>3.06</b>
202004	1017	8	\$ 322	\$ 113.80	4158	4.09
202005	867	7	\$ 310	\$ 116.38	2703	3.12
202006	1236	7	\$ 373	\$ 129.80	3781	3.06
202007	1423	8	\$ 383	\$ 101.28	4326	3.04
202008	1309	8	\$ 332	\$ 82.56	4469	3.41
202009	1239	8	\$ 306	\$ 83.60	4579	3.70
202010	1270	8	\$ 376	\$ 113.12	4846	3.82
202011	1025	10	\$ 705	\$ 148.29	4215	4.11
202012	1367	11	\$ 509	\$ 163.01	6648	4.86
202101	1344	11	\$ 541	\$ 186.65	6421	4.78
202102	1303	11	\$ 806	\$ 305.86	6316	4.85
202103	1508	11	\$ 1,039	\$ 415.16	6458	4.28
202104	1968	14	\$ 1,218	\$ 658.08	7069	3.59
202105	1813	13	\$ 1,406	\$ 644.16	5615	3.10
202106	1537	12	\$ 1,098	\$ 556.99	4295	2.79
202107	1474	11	\$ 898	\$ 460.89	3820	2.59
202108	2002	12	\$ 898	\$ 501.76	4635	2.32
202109	1819	12	\$ 1,057	\$ 637.67	3508	1.93
202110	3131	14	\$ 1,681	\$ 1,050.50	4693	1.50
202111	2362	13	\$ 1,431	\$ 848.89	2724	1.15
202112	3198	12	\$ 1,063	\$ 666.87	2504	0.78
202201	4196	12	\$ 731	\$ 480.71	1844	0.44

CLASS/MONTH	COUNTS	AVG INSTALLMENTS	AVG BEGINNING BALANCE	AVG CURRENT BALANCE	PYMNTS DURING PLAN	AVG PYMNTS DURING PLAN
<b>Bill Assistance Program Payment Match Participants</b>						

PLAN	RES COUNTS
DPP	755
TPP	3,377
<b>TOTAL PLANS</b>	<b>4,132</b>

PLAN	AVG INSTALLMENTS	AVG BEGINNING BALANCE	AVG CURRENT BALANCE	AVG REDUCTION	AVG REDUCTION %	AVG DEFAULT RATE
DPP	21	2702	2289	413	15.3%	74.5%
TPP	19	2413	1524	888	36.8%	78.6%

Based on highlighted months.

CLASS/MONTH	COUNTS	AVG INSTALLMENTS	AVG BEGINNING BALANCE	AVG CURRENT BALANCE	PYMNTS DURING PLAN	AVG PYMNTS DURING PLAN
<b>DPP</b>	<b>755</b>	<b>21</b>	<b>\$ 2,846</b>	<b>\$ 2,421.46</b>	<b>875</b>	<b>0.92</b>
202104	159	22	\$ 2,357	\$ 1,800.11	313	1.97
202105	131	20	\$ 2,580	\$ 2,241.91	251	1.92
202106	64	21	\$ 2,645	\$ 2,057.64	82	1.28
202107	20	22	\$ 2,832	\$ 2,637.05	20	1.00
202108	53	21	\$ 3,311	\$ 3,198.80	41	0.77
202109	99	21	\$ 2,465	\$ 1,928.08	83	0.84
202110	123	23	\$ 2,724	\$ 2,160.73	46	0.37
202111	39	22	\$ 3,569	\$ 3,081.73	9	0.23
202112	53	22	\$ 3,521	\$ 3,161.45	26	0.49
202201	14	19	\$ 2,455	\$ 1,947.07	4	0.29
<b>TPP</b>	<b>3377</b>	<b>19</b>	<b>\$ 2,446</b>	<b>\$ 1,636.91</b>	<b>7609</b>	<b>2.13</b>
202104	571	19	\$ 2,098	\$ 1,388.35	2140	3.75
202105	397	18	\$ 2,150	\$ 1,291.36	1219	3.07
202106	255	18	\$ 2,327	\$ 1,465.49	770	3.02
202107	182	18	\$ 2,516	\$ 1,343.23	557	3.06
202108	216	19	\$ 2,507	\$ 1,656.18	502	2.32
202109	296	19	\$ 2,486	\$ 1,654.90	538	1.82
202110	745	20	\$ 2,806	\$ 1,871.90	1170	1.57
202111	366	20	\$ 2,942	\$ 2,228.69	430	1.17
202112	221	19	\$ 2,497	\$ 1,825.37	211	0.95
202201	128	16	\$ 2,131	\$ 1,643.60	72	0.56