

ORDER NO. 03-407

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

AR 456

In the Matter of a Temporary Rulemaking to)
Adopt Temporary Amendments to OAR) ORDER
860-038-0540; and Modify Order No. 97-196.)

DISPOSITION: TEMPORARY AMENDMENTS ADOPTED;
ORDER MODIFIED

At its public meeting on July 1, 2003, the Commission considered and adopted Staff's recommendation to adopt temporary amendments to OAR 860-038-0540 (Consumer Information Rule) and to adopt a modification of special condition 17 in the stipulated agreement to Order 97-196 (UM 814, Enron exercise of influence over Portland General Electric (PGE)). Staff's recommendation is attached as Appendix A and incorporated by reference. The temporary amendments are a result of discussions during three workshops between Staff and representatives from PacifiCorp, PGE, the Energy Trust, Industrial Customers of Northwest Utilities, Associated Oregon Industries, the Citizen's Utility Board, and other interested parties.

Amendments to OAR 860-038-0540

Pursuant to electric industry restructuring, an Administrator (described in ORS 757.612(3)(b)(A) and (B)) is now responsible for planning, designing, implementing, and evaluating energy programs funded through public purpose funds collected by the investor-owned utility companies. PacifiCorp and PGE previously administered these programs.

In order to implement these programs, the Administrator must receive most of the same proprietary customer information as was available to the electric company. The current rule language does not provide a mechanism for the transfer of proprietary consumer information without the written consent of the customer. The temporary amendments to OAR 860-038-0540 provide a procedure for transferring the information following a written notification to customers.

Modification of special condition

Condition 17 in the stipulated agreement to Order No. 97-196 (UM 814, Enron exercise of influence over PGE) prohibits the transfer of customer information to any of PGE's affiliates or to any person not affiliated with PGE without the written request of the customer.¹ Staff recommended that special condition 17 be modified to read as follows:

Except as provided in OAR 860-038-0540(1)² and (3), PGE shall not provide to any marketing personnel of any of PGE's affiliates or to any person not affiliated with PGE, data or information regarding any individual PGE franchise retail customer unless the customer grants written permission, which may be by electronic means.

Resolution

At its July 1, 2003 Public Meeting, the Commission found that Staff's recommendations are reasonable and should be adopted.

ORDER

IT IS ORDERED that:

1. The temporary amendments to OAR 860-038-0540, attached in Appendix A, are adopted.
2. The temporary rules shall be effective upon filing with the Secretary of State.
3. Special condition 17 of the stipulated agreement in Order 97-196 is modified as stated above.

Made, entered and effective _____.

Roy Hemmingway
Chairman

Lee Beyer
Commissioner

A person may petition the Commission for the amendment or repeal of a rule pursuant to ORS 183.390. A person may petition the Court of Appeals to determine the validity of a rule pursuant to ORS 183.400.

¹ Stipulation at 4, Appendix A, Commission Order 97-196 (UM 814).

² Subsection (1) was inadvertently omitted from the June 27, 2003 Staff Report at 9.

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: July 1, 2003

REGULAR CONSENT EFFECTIVE DATE July 1, 2003

DATE: June 27, 2003

TO: John Savage through Marc Hellman, Rebecca Hathorn and Terry Lambeth

FROM: Carla Owings

SUBJECT: AR 456: Requests to: (1) Adopt temporary amendments in OAR 860-038-0540 regarding the transfer of consumer information from electric companies to the administrator of the conservation and renewable energy public purpose funds; and (2) modify special condition 17 in stipulated agreement to Order 97-196 (UM-814, Enron exercise of influence over PGE).

STAFF RECOMMENDATION:

Staff recommends adoption of the temporary amendments to OAR 860-038-0540 (Consumer Information Rule) and modification of special condition 17 in stipulated agreement to Order 97-196 (UM-814, Enron exercise of influence over Portland General Electric (PGE)).

DISCUSSION:

Amendments to OAR 860-038-0540:

Pursuant to electric industry restructuring, an Administrator (described in ORS 757.612 (3)(b)(A) and (B)) is now responsible for planning, designing, implementing and evaluating energy efficiency and related renewable energy programs funded through the 3 percent public purpose funds collected by the investor-owned utility companies. These programs were previously administered by PacifiCorp and PGE (the Electric Companies).

In order to execute these programs, the Administrator (the Energy Trust) must receive much of the same proprietary customer information as was available to the Electric

Companies and their contractors for planning, designing, implementing and evaluating the programs.

Current rule language does not provide a mechanism for the transfer of proprietary consumer information without the written consent of the customer. Serious prejudice may result to the public interest in the form of less development of energy efficiency and renewable energy resources if the Energy Trust is prevented from obtaining accurate and complete customer information. Failure to act promptly by adopting the proposed temporary rule language could jeopardize the success of the Energy Trust's ability to plan, design, implement and evaluate effective programs that represent cost efficient choices for the public interest.

The proposed amendments to OAR 860-038-0540 provide a procedure for the transfer of proprietary consumer information following a written notification to customers. The process for the transfer of proprietary consumer information is outlined in this memo.

Staff proposes to initiate a docket for adoption of permanent rule language in late October of 2003. Amendments to the temporary language will likely be minor.

Background:

On November 19, 2002, the first of three workshops was held at PGE. Two additional workshops were held on December 18, 2002 and January 9, 2003. In early February, Energy Trust opted to work directly with representatives from companies and customer groups to resolve outstanding issues amongst the Parties.

Upon completion of that process, Staff, representatives from each of the Electric Companies, the Energy Trust, Industrial Customers of Northwest Utilities (ICNU), Citizen's Utility Board (CUB), Associated Oregon Industries (AOI) and other interested parties (the Parties) worked toward agreements that resulted in the proposed rule language attached as *Attachment A*.

The following issues were discussed at the workshops:

- Information Transfer Agreement
- Customer Notification
- Costs
- Customer Complaints
- Timeline for Process

Information Transfer Agreement:

An Information Transfer Agreement will be executed within 30 days of the Commission's adoption of the proposed rule language. The agreement will provide for:

- The necessary format and specific information that will be transferred;
- An estimation of the Electric Company's incremental costs;³
- A non-disclosure agreement pertinent to each Administrator employee and contractor employee to be signed in order to have access to the information;
- A statement restricting the Administrator from releasing proprietary consumer information to any other party for any other purpose without the consent of the consumer;
- A statement describing the Administrator's use of the proprietary consumer information and an agreement not to use the information for telemarketing or direct mailing; and
- A statement of agreement should the Administrator and the Electric Company choose to amend the list of specific information that will be transferred, or if the Administrator chooses not to receive proprietary information from the Electric Company.

Customer Notification:

The Parties agreed to a written informational notification for residential and small nonresidential customers, whose demand is less than one megawatt (1MW) based on a time period to be determined by the Electric Company (under 1MW customer), which informs the consumer that proprietary information is about to transfer from the Electric Company to the Administrator.

The notification identifies the Administrator, lists the specific information about to transfer, describes the nature and use of the information as well as an opportunity to opt-out of the information transfer by such means as: mailing a return response card, calling a phone number, or logging onto a website to fill out an electronic form. A sample of the under 1MW customer notification, which has been agreed to by all the parties, is attached as *Attachment B*.

³ Incremental costs will be discussed in the Costs section of this memo.

No action on the part of the consumer will result in the proprietary consumer information transferring to the Administrator.

Nonresidential Customers whose demand is greater than 1MW (over 1MW consumer) based on a time period to be determined by the Electric Company will receive a similar notification. However, this consumer must actively respond in order to *opt-in* to the information transfer. A sample customer notification for the over 1MW consumer, which has been agreed to by all the parties, is attached to this document as *Attachment C*.

No action on the part of the over 1MW consumer will mean the information will remain only in the records of the Electric Company. The Parties agree that these notices are consistent with the proposed language to OAR 860-038-0540.

Costs:

In Order 01-777, UE 115, PGE rate case and Order 01-787, UE 116, PacifiCorp rate case, money was allocated for Information Technology (IT) systems development as well as labor to implement new systems. All incremental costs incurred by the Electric Companies to perform the tasks associated with this process will be itemized and provided under subsection (3)(a)(B) of the proposed rule and borne by the Administrator.

Ongoing costs will be agreed upon, separately identified, itemized and billed to the Energy Trust per contractual agreements in the Information Transfer Agreements with the Electric Companies.

The notification for the under 1MW consumer would be published in the Electric Companies' monthly newsletter within 45 days from the execution date of the Information Transfer Agreement. There are minimal costs associated with this type of notification.

Consumers whose annual demand is over 1MW per the designated time period, will be notified in writing individually through means of direct mail. The cost estimates provided by the Electric Companies to the Administrator to perform this task appear to be reasonable.

The Electric Companies would then provide database download transfers and customer service training. The Electric Companies have provided estimates to the Administrator for the cost to transfer data both initially and on an on-going basis. These costs appear to be reasonable and non-burdensome for the Administrator.

Customer Complaints:

Electric Company representatives have expressed concern regarding the possibility of "at-fault" complaints that could potentially be lodged against the Electric Company's service quality measures as a result of the Commission's order to implement the temporary amendments to the Consumer Information Rule.

The Commission's Consumer Services Division (Consumer Services) has been notified of the proposed rule language changes and will be provided with finalized versions of the rule as well as copies of the customer notifications mailed out by each Electric Company.

Staff recommends that the Electric Companies' Customer Service Representatives be provided a copy of the finalized version of the proposed rule language as well as be provided training by the Electric Company to respond to inquiries that may occur as a result of the customer notification.

If Consumer Services receives a complaint and the consumer has been given accurate and complete information about the transfer of proprietary consumer information, but the consumer still desires to lodge a complaint with Consumer Services, this would generally be treated as informational and no "at-fault" claim would result from this type of inquiry.

However, should Consumer Services receive a complaint where the customer indicates that they have already queried the Electric Company and was given unsatisfactory, or no information, an "at-fault" claim against that Company's quality service measures could result.

Timeline for Process:

Within 30 days of the Commission's adoption of the temporary amendments to the Consumer Information Rule:

- The Electric Companies will execute Information Transfer Agreements with the Administrator.
- The Electric Companies will prepare and train customer service representatives to handle potential inquiries into the call centers.
- The Electric Companies will prepare customer notification with response mechanism features for the under 1MW consumer to conform with the sample notification provided in *Attachment A* of this document. This notification must be completed within 45 days following the execution of the Information Transfer Agreement.

Within 45 days following the completion of the notification to the under 1MW consumers and once every 45 days thereafter, each Electric Company will perform the database

transfer of information to the Administrator. This process allows 120 days from the time the rules are adopted by the Commission (on or about July 1, 2003) to the date required for the Electric Companies to transfer information to the Administrator (approximately October 30, 2003).

Within 45 days following the completion of the first transfer of information to the Administrator, and once every quarter thereafter, each Electric Company will provide updated information in accordance with the provisions in the proposed rule language.

Within 80 days following the execution of the Information Transfer Agreements, each Electric Company will provide notification in writing to the over 1MW consumer of the opportunity to *opt-in* for proprietary consumer information to transfer to the Administrator. The Electric Companies will prepare customer notifications for the over 1MW consumers to conform to the sample notification provided in *Attachment C* of this document.

Within 45 days following the notification to the over 1MW consumers, each Electric Company shall transfer proprietary information relating to the companies that have chosen to opt-in to the information transfer to the Administrator. This process allows approximately 165 days from the adoption by the Commission of the proposed rule language (July 1, 2003) to the transfer of proprietary information to the Administrator (approximately December 15, 2003).

Within 30 days following the transfer of proprietary information, the Electric Company shall submit to the Administrator an itemized billing of incremental costs with a copy provided to Commission Staff.

PROPOSED ALTERNATIVE:

Recently, the Energy Trust and PGE have come to an alternative agreement regarding the transfer of consumer information. This proposal would be as follows:

1. PGE would provide to the Energy Trust market samplings of consumer information not considered to be proprietary in an aggregated format.
2. The Energy Trust would purchase proprietary information from third-party resources commonly available in the market place.
3. PGE would provide a data matching service to assist the Energy Trust in correlating the information into data sets that can be used for the Energy Trust's programs.

4. No notification would be necessary for consumers under 1MW since no proprietary information will be transferred from PGE to the Energy Trust.

Both PGE and the Energy Trust are optimistic that this process will be both cost effective and release PGE from the obligation of providing proprietary information to all customers. Test samples of data have already been transferred to the Energy Trust and have proven to be useful.

Staff believes that this process, as long as it adequately meets the needs of both the Electric Company and the Energy Trust could be an acceptable surrogate to the process outlined in the proposed rule language. Staff has accommodated this process in subsection (3)(a)(F) of the rule where it is stated: "A statement of agreement if the Administrator and an Electric Company choose to amend the list of specific ... or if the Administrator chooses not to receive proprietary information from the Electric Company."

If the procedure as proposed by PGE is ineffective or costly, Staff recommends that there be a default clause prepared in the Information Transfer Agreement which directs PGE back to the rule process to accomplish the information transfer.

PacifiCorp believes that the process being adopted by PGE and the Energy Trust is complicated and more costly. PacifiCorp prefers to simply comply with the proposed rule process and does not object to PGE going forward with their optional proposal.

Neither Staff nor other interested parties have objections to this process and all parties agree that the rule language is consistent with allowing for individual processes for the transfer of consumer information.

UNRESOLVED ISSUES:

Timeline for Process:

Both PGE and PacifiCorp raised a concern regarding the proposed timeframes suggesting that the timelines be addressed in the Information Transfer Agreements between the Electric Companies and the Energy Trust, and not in the rule. The Electric Companies have stated that customer notification requires planning and scheduling, and the billing cycles need to be considered when planning response times.

The Energy Trust has asked Staff to strongly encourage the Electric Companies to make every effort to provide consumer information even earlier than the proposed timelines. Energy Trust's ability to plan, design, implement and evaluate effective programs and provide reports to the PUC, in part, depends on Energy Trust's receipt and use of consumer information.

The planning and implementation of this process began in August of 2002. Staff's proposal would allow approximately 75 days from the Commission's adoption of the proposed rule language to the completion of notification for the under 1MW consumers.

During the workshops, the Electric Companies assured Staff and the Energy Trust that notification in the Companies' newsletters would be more cost effective. **Staff recommends that the Commission adopt the proposed timelines** since the Electric Companies have had sufficient time to plan for newsletter notification.

Utility Llnk:

PGE has requested that Staff include the following in subsection (1)(a) of the proposed rule language: "...except in the case of information that needs to be provided under subpoena or through Utility Llnk which is the provision...."

Utility Llnk is a service or internet connection which allows the partnering of utility companies to share information on a customer who is applying for service. Approximately 35 utilities, Public Utility Districts, municipals and water districts participate in this program.

Currently, PGE believes that they are precluded from sharing customer information with other utility companies without the written consent of the consumer in accordance with the current and proposed language of OAR 860-038-0540.

While Staff agrees with PGE's concern, **Staff recommends that the Parties discuss this issue in a workshop during the permanent rule making** in order to avoid proposing temporary language that may later prove to be ineffective or unclear.

MODIFY SPECIAL CONDITION 17 IN STIPULATED AGREEMENT TO ORDER 97-196 (UM 814, ENRON EXERCISE OF INFLUENCE OVER PGE:

Commission order 97-196 prohibits the transfer of customer information to any of PGE's affiliates or to any person not affiliated with PGE without the written request of the customer. Condition 17 states:

PGE shall not provide to any marketing personnel of any of PGE's affiliates or to any person not affiliated with PGE, data or information regarding any individual PGE franchise retail customer unless the customer grants written permission, which may be by electronic means.⁴

In order to comply with the modifications to OAR 860-038-0540 as set above, Staff recommends the Commission modify special condition 17 of the stipulated agreement in Order 97-196, Enron exercise of influence over PGE.

Staff recommends that special condition 17 be modified to read:

Except as provided in OAR 860-038-0540 (3), *PGE shall not provide to any marketing personnel of any of PGE's affiliates or to any person not affiliated with PGE, data or information regarding any individual PGE franchise retail customer unless the customer grants written permission, which may be by electronic means.*

PROPOSED COMMISSION MOTION:

Temporary amendments to OAR 860-038-0540 be adopted and special condition 17 in stipulated agreement to Order 97-196 (UM-814, Enron exercise of influence over PGE) be modified according to Staff's recommendation.

AR 456 Customer Information Rule-Modify Order 97-196

⁴ Condition 17; Page 4-Stipulation, Appendix A, Commission Order 97-196, UM 814.

860-038-0540

Consumer Information

(1) **Except as provided in section (3) of this rule, an electric company shall implement adequate safeguards precluding employees of its competitive operation, electricity services suppliers (ESSs), or other entities from gaining access to information in a manner that would:**

(a) Allow or provide a means to transfer proprietary consumer information from an electric company to its competitive operation, electricity services suppliers **ESSs**, or other entities, without the ~~written~~ consent of the consumer **expressed in writing, orally, or by electronic means except in the case of information provided under subpoena;**

(b) Create an opportunity for preferential treatment or unfair competitive advantage;

(c) Lead to consumer confusion; or

(d) Create significant opportunities for cross-subsidization of its competitive operations.

(2) An electric company ~~must~~ **shall** determine the types of proprietary consumer information that will be made available to its competitive operations, ESSs, and other entities. An electric company shall file the types of information, and the prices, terms, and conditions associated with the dissemination of such information, with the Commission for approval. An electric company shall disseminate proprietary consumer information only under tariff **except for information shared under section (3) of this rule.**

(3) Notwithstanding section (1) of this rule, an electric company shall disseminate proprietary consumer information to the entity that administers the conservation and renewable public purpose funds described in ORS 757.612 (3)(b)(A) and (B), hereafter "Administrator," as follows:

(a) Within 30 days of the approval of these rules by the Commission, an electric company shall execute an Information Transfer Agreement with the Administrator that provides for the transfer of consumer information, including proprietary consumer information, to the Administrator. This contract shall specify:

(A) The necessary database format and information that will be exchanged. This information may include proprietary consumer information except that under no circumstances shall phone numbers, social security numbers, billing and payment history, credit information, tax identification numbers, driver's license numbers, life support information, or other medical information be provided without the written consent of the consumer;

(B) An estimate of the electric company's incremental costs. Within 30 days of the completion of the transfer of consumer information, including proprietary consumer information, an electric company shall submit to the Administrator an itemization of the actual incremental costs for payment;

(C) A general non-disclosure statement as well as a specific non-disclosure agreement that each Administrator employee and contractor employee shall sign to have access to consumer information, including proprietary consumer information;

(D) The release of proprietary consumer information by the Administrator for any other purpose or to any other party shall not be made without written, oral or electronic consent of the consumer;

(E) The proprietary consumer information will be used by the Administrator to implement, administer, and evaluate energy efficiency and renewable energy programs and will not be used for telemarketing or direct mailings to consumers; and

(F) A statement of agreement if the Administrator and an electric company choose to amend the list of specific information described in subsection (3)(d) of this rule, or if the Administrator chooses not to receive proprietary information from the electric company.

(b) Within 45 days from the execution of the Information Transfer Agreements, described in subsections (3)(a)(A) through (F) of this rule, the electric company shall notify in writing consumers whose demand is less than one megawatt (1MW) in a time period determined by an electric company and whose proprietary information will be transferred to give consumers an opportunity to opt-out of the information transfer.

(c) The notification shall at a minimum:

(A) Identify and explain the role of the Administrator;

(B) Identify the type of proprietary consumer information to be transferred by an electric company;

(C) Describe the nature and use of the proprietary consumer information by the Administrator; and

(D) Provide consumers either by direct mail, company newsletter, or other annual notification acceptable to the Administrator and the electric company with the option to opt-out of the information transfer either annually, or on a program-by-program basis.

(d) Subject to subsection (3)(a)(F) of this rule, within 45 days after an electric company has notified consumers of an information transfer, the electric company shall, at a minimum, transfer to the Administrator proprietary consumer information such as: consumer name, service address, 18 months of the most recent historical usage data provided on a per month basis, point of delivery identification number, and rate schedule for each consumer unless the consumer has opted-out pursuant to subsection (3)(b) of this rule. If available in the electric company's records, the electric company shall provide the consumer's type of space heat and prior energy efficiency program participation. The electric company shall also:

(e) Subject to subsection (3)(a)(F) of this rule, within 45 days after completing the transfer of proprietary consumer information and the end of each quarter thereafter an electric company shall provide updates for the all of the usage data and revisions to the underlying database information to the Administrator, in accordance to subsection (3)(d) of this rule.

(f) Subject to subsection (3)(a)(F) of this rule, within 80 days after the execution of the Information Transfer Agreement described in subsection (3)(a) of this rule, an electric

company shall notify in writing consumers whose demand is greater than 1MW (over 1MW consumer) based on a time period determined by an electric company (consumers without a 12-month usage history that may meet the 1MW requirement by having their annual demand estimated for the purpose of this provision) in accordance with the requirements set forth in subsection (3)(c)(A) through (C) of this rule. Consumers having multiple accounts may have their accounts treated as a group for the purpose of this rule and have the ability to include or exclude all accounts through one notification process. Such consumers shall opt-in before the sharing of their proprietary consumer information with the Administrator; and

(A) Within 45 days after completing the consumer notification described in subsection (3)(f) of this rule, provide proprietary consumer information related to the over 1MW consumers only for those companies that have chosen to opt-in annually, or on a program by program basis; and

(B) An electric company shall provide an annual opt-in notification for over 1MW consumers either as part of a standard consumer contact discussion or in writing.

(g) When an electric company has provided proprietary consumer information to the Administrator in accordance with this rule, the electric company shall not be charged with at-fault complaints filed with Commission's Consumer Services as long as the provision of proprietary consumer information is the only issue raised by the consumer and the electric company did not violate Tariff, Oregon Administrative Rules, Oregon Revised Statutes, or a Commission Order.

Stat. Auth.: ORS 183, ORS 756 & ORS 757

Stats. Implemented: ORS 756.040 & ORS 757.600 through ORS 757.667

Hist.: PUC 2-2001, f. & cert. ef. 1-5-01

The Energy Trust of Oregon Requests Information to Better Serve You

The Energy Trust of Oregon, Inc. is a nonprofit organization created to help [PGE/PacifiCorp] customers manage their energy costs and benefit from renewable energy. Under Oregon law, a portion of the three percent "public purpose" charge on your utility bill funds Energy Trust programs. To provide better service to you, the Energy Trust is requesting information from [PGE/PacifiCorp] about their customers.

The information being requested is limited to: customer name, utility account number, service address, historical usage data, heat type, rate type, and past participation in energy efficiency programs. All other customer information will be retained and kept confidential by [PGE/PacifiCorp]. The Energy Trust will *only* use this information to design, evaluate and improve the quality of current and future services available to you.

If you would like [PGE/PacifiCorp] to forward this information to the Energy Trust, no action is needed. If you prefer that this information not be transferred, simply respond to us. You may also decline the transfer by completing a form on our website at: [www.pacificpower.net/goto/trustdata, www.portlandgeneralelectric.com . .] We must receive your request by XX date.

The Energy Trust will hold all customer information it receives in strict confidence and not use it for marketing purposes.

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Under 1MW Customer Notification
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For more information about the Energy Trust program opportunities for you to participate, please call: 1-866-ENTRUST (1-866-368-7878) or visit www.energytrust.org. Thank you.

Word count: 234

(Note duplication of utility names and web sites which, once removed, will further reduce the word count.)

Dear [PGE/PacifiCorp] Customer,

The Energy Trust of Oregon, Inc. is a nonprofit organization providing energy efficiency and renewable energy programs to large [PGE/PacifiCorp] commercial and industrial customers. Under Oregon law, a portion of the three percent "public purpose" charge on your utility bill funds Energy Trust programs. To provide you with financial incentives and other program benefits, the Energy Trust is requesting information from [PGE/PacifiCorp] about their customers. Your permission is necessary before such customer information can be transferred to the Energy Trust.

The information requested by the Energy Trust is limited to: customer name, utility account number(s), service address(es), historical usage data, type of heat, rate schedule and past participation in energy efficiency programs. All other customer information will be retained and kept confidential by [PGE/PacifiCorp].

The Energy Trust will use this information *only* to design, evaluate and improve the quality of services offered to you. Because the Energy Trust recognizes that this information is proprietary in nature, all such information will be held in strict confidence and not used for marketing purposes.

If you would like to grant your permission to allow [PGE/PacifiCorp] to forward this information to the Energy Trust, simply complete the form below and return it to us. You may also complete a form on-line at our website: [www.pacificpower.net/goto/trustdata, www.portlandgeneralelectric.com. . .] We must receive your permission by XX date.

For more information about Energy Trust program opportunities and how you can participate in them, please call: 1-866-ENTRUST (1-866-368-

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7878) or visit the Energy Trust website at: www.energytrust.org. Thank you for your consideration.

[PGE/PacifiCorp]