

the
Energy
Project

Chuck Eberdt
Director

3406 Redwood Ave.
Bellingham, WA 98225

email
chuck_eberdt
@oppco.org

phone
(360) 734-5121
ext. 332

fax
(360) 676-9754

a project of:



Community Action

A Community Action Agency
serving Whatcom, Island and
San Juan Counties since 1965

Mr. Steven V. King
Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket No. UE-130545 PacifiCorp 's Petition for Exemption from WAC 480-100-128(6)(k)

Dear Mr. King,

The Energy Project would like to go on record as strongly supporting the Commission Staff's recommendation to deny PacifiCorp's petition to be exempt from the requirements of WAC 480-100-128(6)(k). Staff's memo does a fine job of outlining the lack of proof of the need for change, recommending alternatives that could be used to continue the practice safely, and noting that the change in practice would have great impact low-income residential customers. We want to underscore their points that low-income customers are less likely to have bank accounts, credit cards, telephone or computer on-line access, or even transportation that make other means of payment easy for some customers.

We believe it is important to emphasize that when households are as cash strapped as the low-income households that this policy change would ultimately target, paying bills is a crisis management process. The next bill that gets paid is literally the next bill that comes to the door. Exempting PacifiCorp from WAC 480-100-128(6)(k) would take that payment pathway away from this vulnerable population. The result is not just that they don't have this opportunity to pay the bill, but, as Staff pointed out, they are "subject to a reconnection fee and possible loss of refrigerated foods and/or medications until service is restored, in addition to any other consequences that arise from an arguably avoidable inconvenience." Applying available funds to the bill instead of paying a reconnection fee is much better for other ratepayers and the utility as well as the low-income customer.

The Energy Project recognizes that the utility's request is motivated by concern for the safety of their workers and not intended to target this vulnerable community. The Company's case, however, is not proven and is surpassed by the negative consequences that will result for their most vulnerable customers. For these reasons we join the Office of Public Counsel and Commission Staff in recommending the Commission deny this request.

Respectfully,

A handwritten signature in black ink, appearing to read "Charles M. Eberdt", with a long horizontal flourish extending to the right.

Charles M. Eberdt, Director