



ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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July 23, 2021

SENT VIA WUTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: PacifiCorp's Revisions to the Low Income Bill Assistance Program,
Docket UE-210533

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in response to PacifiCorp's revisions to their low income bill assistance program, filed July 2, 2021, in Docket UE-210533.

Public Counsel's Recommendation

Public Counsel recommends the Commission approve PacifiCorp's revisions to their low income bill assistance program filed in Docket UE-210533.

PacifiCorp has filed several modifications to its Low Income Bill Assistance (LIBA) program, with a proposed effective date of August 1, 2021. The Company proposes to expand the Tier 3 Income Guideline to 200 percent of the Federal Poverty Guideline or 80 percent of Area Median Income, whichever is greater. They also propose to change the discount program from a per kWh credit for usage over 600 kWh to a straight percentage discount to the customer's bill. Another modification is to remove the annual cap on enrollment.

Over the last several months, PacifiCorp has worked with their Low Income Advisory Committee to explain and receive feedback about their proposed modifications. Public Counsel believes that the modifications the Company has offered are appropriate. The expansion of income eligibility is required by the Clean Energy Transformation Act.¹ We believe that a percentage discount rate would be easier for customers to understand and provide approximately the same financial benefits to customers. Finally, we believe that is appropriate to remove the

¹ RCW 19.405.120(2) and WAC 480-109-060(22) defining "low income."

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annual enrollment cap as the community action agencies have stated that they have the resources available to support the increase in program participation. We also know that PacifiCorp's territory has a higher rate of poverty than Washington's average and offering support to a greater number of vulnerable customers at this time is reasonable and desirable. Public Counsel recommends that the Commission approve the Company's LIBA program modifications.

With respect to costs relating to the LIBA program, Public Counsel remains very interested in reviewing the Company's upcoming filing regarding program costs and its proposed tariff surcharge, particularly surrounding the under-collection of LIBA program costs in prior years.

Public Counsel appreciates the opportunity to submit these comments. If you have any questions about this filing, please contact Stephanie Chase at (206) 521-3212 or via e-mail at Stephanie.Chase@ATG.WA.GOV.

Sincerely,

Lisa W. Gafken

/s/
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