

December 21, 2015

***VIA ELECTRONIC FILING***

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

**RE: Docket U-144155—Pacific Power & Light Company Comments**

Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits the following comments in response to the Washington Utilities and Transportation Commission's (Commission) Notice of Opportunity to Submit Written Comments issued November 20, 2015, in Docket U-144155 (Notice).

Pacific Power appreciates Staff's consideration of the comments submitted on October 5, 2015, and its recommendation to work individually with utilities on the timing for implementation of the rules. Pacific Power believes this flexibility will allow for smooth transition when the new rules are adopted. In response to the Notice, Pacific Power is providing limited comments on the following topics: adjustments for nonresidential customers, adjustments for billing errors, adjustments for over-billings, utility procedures for identifying meter errors, billing errors and unassigned usage, and conflict with Washington Administrative Code (WAC) 480-100-183(5)(a).

**Adjustments for Nonresidential Customers**

As stated in its October 5, 2015 comments, Pacific Power believes a longer period should be allowed for under-billing adjustments for nonresidential customers. Not only can the complexity of nonresidential metering make it difficult for utilities to identify problems, billing errors could be directly related to the nonresidential customer failing to notify the utility of changes they have made in their operations or wiring. In an effort to maintain the intended goal of this rulemaking proceeding while ensuring that residential customers do not subsidize nonresidential customers, Pacific Power recommends modifying the language in the proposed WAC 480-100-178(5) to state nonresidential adjustments for under-billings will be limited to six months, unless the utility shows good cause why a longer period is necessary due to circumstances beyond the utility's control. This provision would be similar to the provision in WAC 480-100-123(5), which allows utilities to seek approval from the commission to refuse providing new or additional service for reasons not addressed in the rule.

**Adjustments for Billing Errors**

Pacific Power previously proposed a 36-month limitation for under-billing related to billing errors because certain billing errors, such as crossed meters, are difficult to identify through a process and can be caused by circumstances beyond the Company's control. To address this concern, Pacific Power proposes WAC 480-100-178(5) limit under-billing adjustments for billing errors to six months, unless the utility shows good cause why a longer period is necessary due to circumstances beyond the utility's control.

**Adjustments for Over-Billing**

The proposed rules should state the adjustment requirements for utilities. Having a specific adjustment period for overbillings plainly defined in the rules eliminates confusion for all parties, including customers. In the summary of comments issued November 20, 2015, Staff disagreed with Pacific Power's proposed adjustment period of 36 months, noting the Commission's record retention policy was six years. For clarity, Pacific Power recommends the rule state the maximum adjustment period utilities are required to adjust bills for over-billing is six years.

**Utility Procedures for Identifying Meter Errors, Billing Errors and Unassigned Usage**


As noted in Pacific Power's July 21, 2015 comments and the October 5, 2015 comments of Northwest Natural Gas and Puget Sound Energy, section (5)(c), which requires utilities to develop, maintain, and file with the Commission procedures to identify and correct metering errors, billing errors, and unassigned usage situations, is unnecessary and Pacific Power proposes the section be removed from the rule. The proposed rule includes a built-in incentive for utilities to develop such procedures by enforcing a six-month limitation for corrected bills for under-billing. Utilities that do not implement procedures are limited in their ability to adjust the bill and recover any charges from customers. The Commission can determine the effectiveness of a utility's procedures by evaluating the types of complaints the Commission receives from the utility's customers and may request the same information of the utility should an inquiry or investigation is initiated.

**Conflict with WAC 480-100-183, Complaint Meter Test**

The Company maintains that a conflict exists between WAC 480-100-183(5)(a) and the proposed WAC 480-100-178(5). The language in WAC 480-100-183(5)(a) states in situations the date that the customer was first billed using a malfunctioning meter is known, the utility must refund or bill the customer back to that date. WAC 480-100-183(5) does not provide a six-month limitation for under-billing when the relevant date is known. If a utility discovered a meter error through a customer-requested meter test and determined the customer was under-billed for 12 months, to comply with WAC 480-100-183(5)(a), the utility would be required to adjust the customer's bill for the full 12-month period. However, had the meter error been identified by the utility's processes or procedures discussed in WAC 480-100-178(5)(c), that same under-billing adjustment would be limited to six months. As noted in its October 5, 2015 comments, Pacific Power proposes WAC 480-100-183(5) be modified to indicate that when a meter error is discovered through a customer-requested meter test the adjustment must be completed in accordance with WAC 480-100-178(5)(a).

Pacific Power appreciates the opportunity to provide these comments. If you have any questions regarding these comments, please contact Heather Qualey, Manager, Customer Advocacy & Tariff Policy, at (503) 813-7466, or Ariel Son, Manager, Regulatory Projects, at (503) 813-5410.

Sincerely,

  
R. Bryce Dalley  
Vice President, Regulation