

February 10, 2021

***VIA ELECTRONIC FILING***

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

Received  
Records Management  
02/10/21 16:16  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**Re: Docket U-200281—PacifiCorp’s Comments**

PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) appreciates the opportunity to respond to the Commission’s Notice of Opportunity to Comment issued on January 26, 2021. PacifiCorp is actively engaged in ensuring a smooth transition for our customers when the moratorium on disconnections comes to an end. To that end, we look forward to discussing PacifiCorp’s plans for helping customers during the transition period and sharing PacifiCorp’s experiences in our other states at the February 17 recessed open meeting.

**Arrearage Management**

PacifiCorp has been working with its Low Income Advisory Committee to discuss and develop its COVID-19 Bill Payment Assistance Program (BPAP). After several meetings, PacifiCorp’s BPAP is currently being finalized with a target implementation date of no later than April 1, 2021.

Under the new BPAP, PacifiCorp will provide an automatic grant of up to \$2,500 annually for low income customers with an account balance in arrears. Low income customers are customers who are either currently enrolled in PacifiCorp’s Low Income Bill Assistance (LIBA) program or have received energy assistance payments within the past 15 months, or since October 1, 2019. Customers who do not automatically qualify for BPAP under the above two criteria may apply for a grant of up to \$2,500 through an energy assistance agency.

Automatic grants will be applied before the end of the moratorium and before any collection activities commence. Customers will also be able to re-apply for additional BPAP benefits up to the annual cap of \$2,500 for past due balances. The grants are not intended to create a credit on an account, but to assist with past due bills and arrearage balances.

**Bill Assistance Fund Availability and Projected Needs**

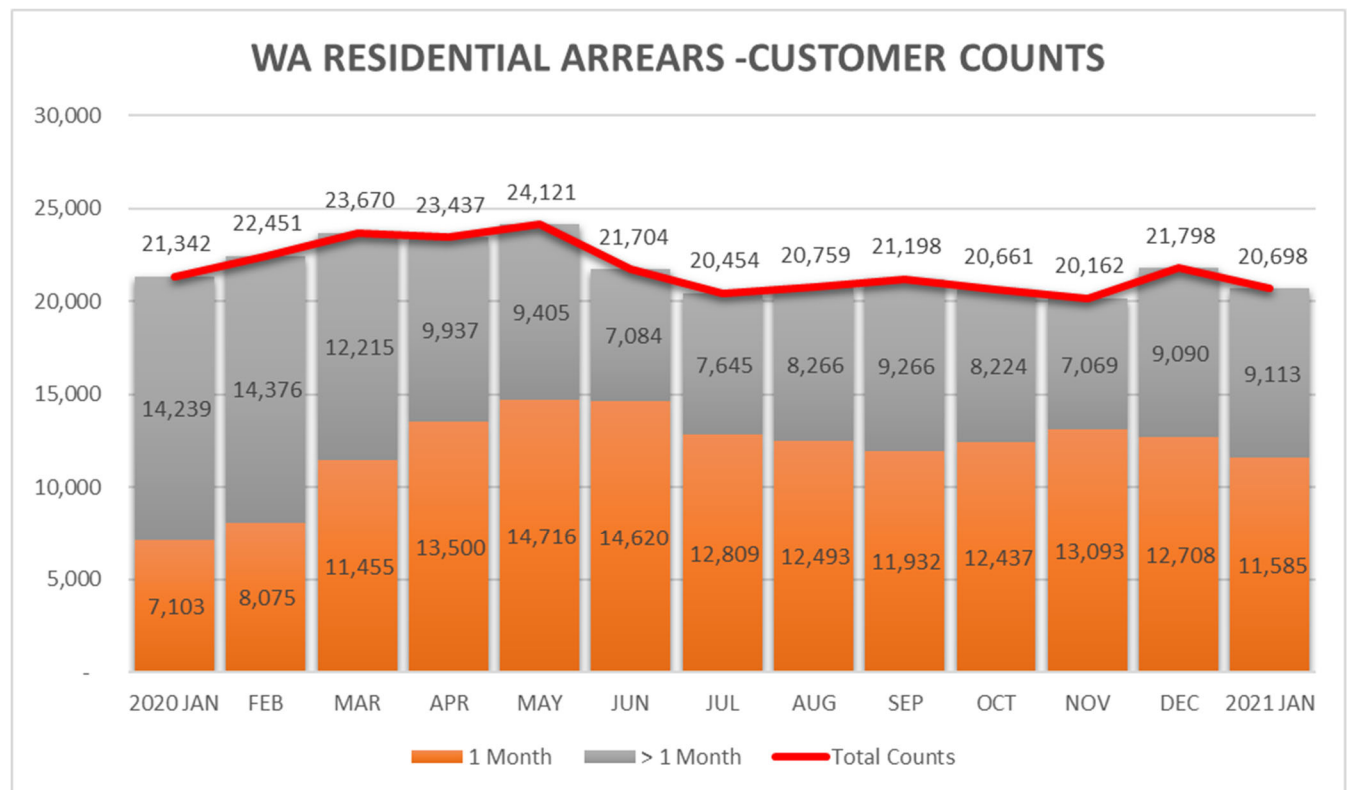
PacifiCorp has committed to fund the BPAP with one percent of the Company’s 2019 annual retail revenues in Washington. This is approximately \$3.1 million. The BPAP will begin on April 1, 2021, and will continue until funding is depleted.

The \$3.1 million budget is comprised of four categories:

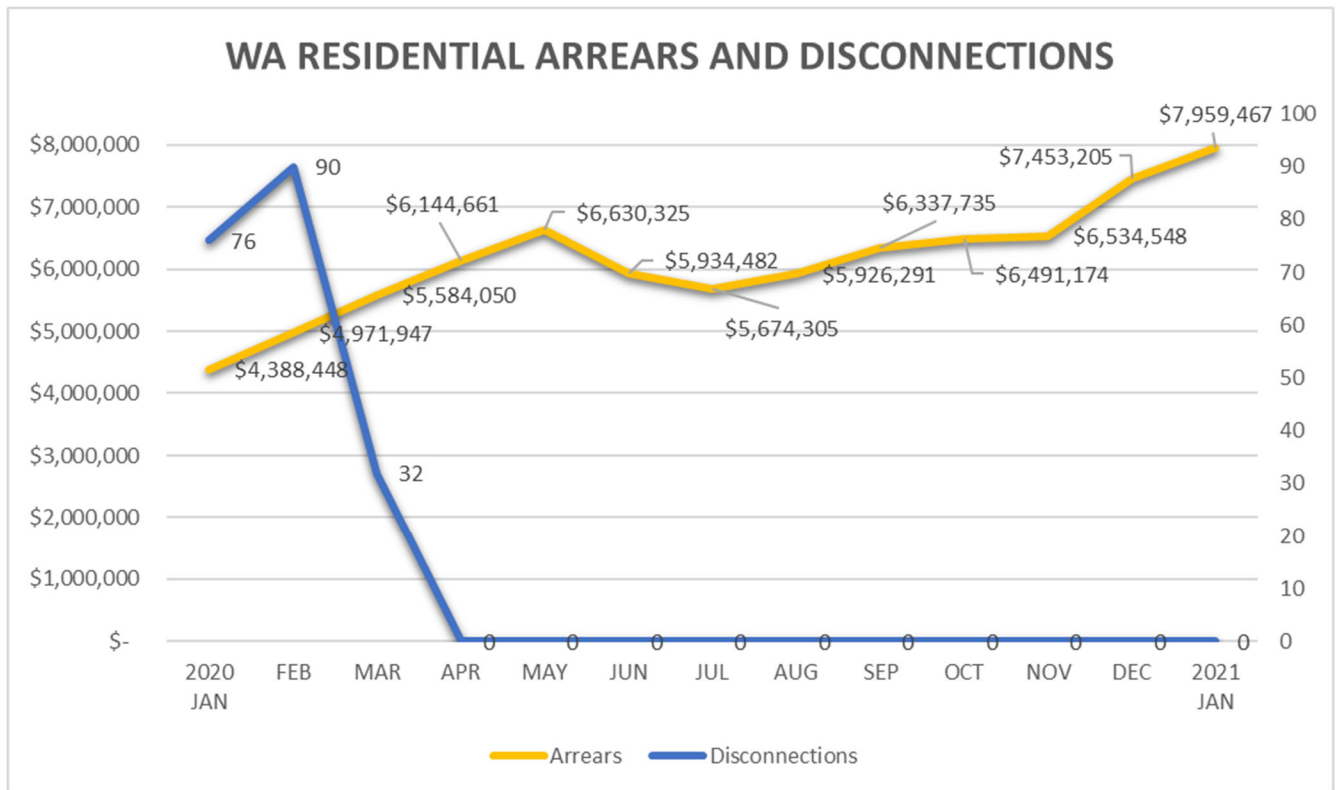
Category	Amount
Arrearage Assistance Fund <sup>1</sup>	\$2.9m
Internal Administrative Costs	\$25k
Marketing & Outreach	\$25k
Reserve/Contingency Funds	\$150k
<b>Total</b>	<b>\$3.1m</b>

Using the low-income criteria discussed above and based on current data, the Company is allocating approximately \$800,000 to fund the Automatic Grants under the new BPAP, which will effectively eliminate the arrearage balances for the identified low-income customers. The remaining \$2.1 million will fund additional grants to serve as many customers as possible within the available funding balance.

PacifiCorp does not intend to offer an arrearage management program at this time but continues to work with its Low Income Advisory Committee and other stakeholders to understand best practices for an arrearage management program. As shown below, the data indicates that the number of customers with aging, past due balances has not increased compared to levels before the pandemic, but the arrearage balances are growing. PacifiCorp is optimistic that we will be able to assist these customers.



<sup>1</sup> PacifiCorp estimates that the agency administrative costs will range between approximately \$370,000 to \$625,000, depending on the number of certified applications, and these costs will be included in the Arrearage Assistance Fund.



**Communication and Outreach**

PacifiCorp has been proactively communicating with its customers from the beginning of the COVID-19 pandemic, and continues to reach out to customers through the following methods:

**Website:**

Pacific Power maintains a webpage dedicated to COVID-19 relief resources available to residential and non-residential customers. The webpage includes information and links for various energy assistance programs, flexible payment options, and a list of frequently asked questions and answers that may be helpful for customers.

**Outbound Calls:**

Automated reminders and outbound calls are made to customers who have past due balances. Automated calls are reminders to customers with past due balances and are not on a payment arrangement. Customer care agents also call customers who are three months past due and do not have payment plans.

**Email regarding Energy Assistance:**

Pacific Power uses email communications to provide links to available, local resources. The email also includes information on the location and contact information for energy assistance agencies, qualifications for energy assistance, and instructions on how to apply for assistance.

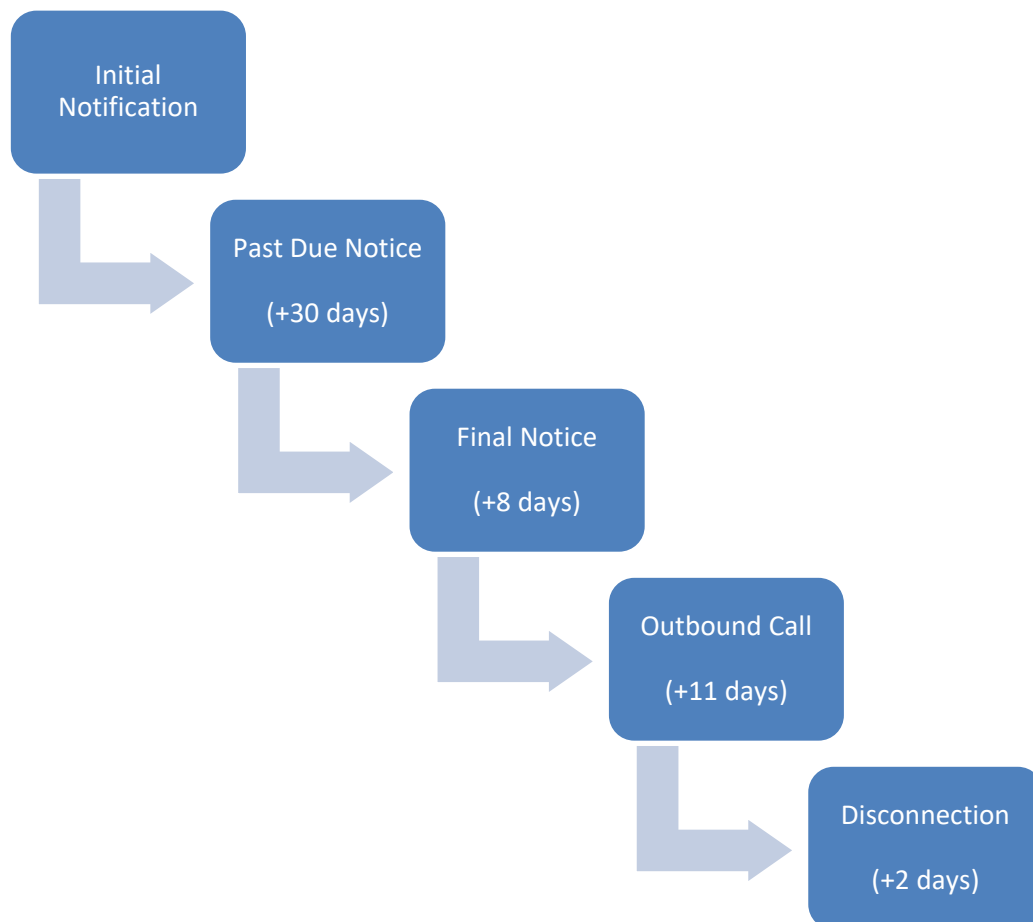
**Bill Messages:**

PacifiCorp has been encouraging customers to contact the Company to make flexible payment arrangements and receive available assistance information. Bill messages also include information regarding the current moratorium on disconnections and late fees. Past due notices also include energy assistance information and contact information for community action agencies.

**Transition Plan**

At least thirty days before the expiration of the moratorium, PacifiCorp will notify all customers by outbound calls, bill messages, email, texts, and social media updates. Collection notifications will begin thirty days after the first communication.

The timeline from initial notification to disconnection would occur as follows:



The timeline above represents the shortest timeline that these activities could occur. Consistent with its work in the Rocky Mountain Power states, PacifiCorp intends to take a conservative approach to these activities to ensure that customers are given every opportunity and maximum assistance possible to avoid disconnection.

To promote a successful transition and maximize assistance options, however, it is imperative to have firm, certain dates to communicate the changes effectively. It is difficult to effectively mobilize available resources for customers who need it most if there is no certainty in the implementation dates. To that end, PacifiCorp is aligning with its fellow utilities to propose a later start date than originally determined in the term sheet, but stresses the importance of having these dates be firm and final.

### **Current Customer COVID-19 Data**

PacifiCorp submitted its most recent report in response to the data reporting requirements in Order 01 on January 29, 2021, and updated one of its attachments on February 3, 2021. PacifiCorp does not have any further updated data to provide at this time.

### **Experience in Other States**

As a six-state utility, PacifiCorp has a unique view into the impacts of different approaches to moratoriums on disconnections and late fees. Despite the difficulties brought on by the pandemic, PacifiCorp is pleased to be able to report on positive outcomes as moratoriums ended in other states served by PacifiCorp (Idaho, Utah, and Wyoming) in July of 2020. After all customers were notified of the ending moratorium, PacifiCorp implemented targeted communications with customers with past due balances using a variety of contact methods including outbound calls, emails, and social media posts. These communications encouraged customers to contact the Company to receive available assistance options before the end of the moratorium.

As a result of the proactive communication strategies, numerous customers requested and received assistance to secure affordable payment arrangements with the Company. Service disconnections were implemented with a conservative approach, while outbound calls continued for customers with past-due balances who were non-responsive to the Company's previous communication efforts.

PacifiCorp appreciates the opportunity to provide comments in response to the Notice. Please direct any questions related to these comments to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

/s/

---

Etta Lockey  
Vice President, Regulation  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
(503) 813-5701  
[etta.lockey@pacificorp.com](mailto:etta.lockey@pacificorp.com)