

March 23, 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 No. U-144155—Comments of Pacific Power & Light Company**

Pacific Power & Light Company, a division of PacifiCorp (Pacific Power or Company), submits the following comments in response to the Washington Utilities and Transportation Commission’s (Commission) Notice of Opportunity to Submit Written Comments (Notice) issued February 20, 2015, in Docket No. U-144155.

The Notice sets forth a set of questions to elicit certain information related to meters and billing and also notes additional written comments may be provided.<sup>1</sup> Pacific Power offers the following comments in response to the Commission’s specific questions:

**1. Please provide the average number of meters in service from 2012 to 2014.**

On average, Pacific Power had 132,820 meters in service from 2012 to 2014. The following table provides the specific number of meters in service each year.

Number of Meters		
2012	2013	2014
132,138	132,848	133,473

**2. Please provide three years of historical data showing the following:**

*a. Total number of retroactive bills and length of the retroactive bills for stopped meters.*

Number of Months Retroactively Billed	Number of Accounts		
	2012	2013	2014
1	1	9	
2	4	6	6
3		2	
4	1		1
5		2	
6			
7		1	

<sup>1</sup> Notice, pp. 2-3

b. *Total number of unidentified energy usage meters.*

Number of Months Retroactively Billed	Number of Accounts		
	2012	2013	2014
1	1994	1652	874
2	832	746	414
3	431	344	198
4	162	113	128
5	47	61	41
6	41	27	20
7	16	18	1
8	14	5	6
9	4	5	5
10	9	4	
11	6	1	1
12	2		2
Greater than 12 months	11	8	8

**3. What is the company's policy regarding bill settlement for metering errors?**

After Pacific Power identifies a stopped meter, it follows the Company's tariff Rule 10, *Billing*, Section D, *Adjustment for Billing Errors*, when making any billing adjustments. Adjustments for billing errors will not exceed six months unless the Company can identify the cause of the error and the date the error occurred. However, in no case would the Company adjust the billing for more than three years.

Pacific Power does not consider unidentified energy usage (e.g. situations where a customer has moved into a location and used the electricity prior to applying for service) as metering errors. The Company treats these situations as a backdated connection of service. If Pacific Power determines that the customer used the electricity before applying for service, the customer is billed for the energy it used in accordance with Washington Administrative Code (WAC) 480-100-128(f).

**4. Does the company have a billing threshold before investigating zero-read meter readings or unidentified energy usage? If so, please provide information on the company's minimum billing threshold.**

Yes, the Company uses thresholds to initiate investigations of zero-read meters and unidentified energy usage. The Company's Customer Service System (CSS) has programmed several thresholds or error criteria that, when met, will prompt a manual review of the account before billing.

The thresholds are as follows:

- Meters with zero use will be included on the Zero Consumption Report for manual review after two months of:
  - zero usage for residential and non-residential service;
  - 25 percent fluctuation on nonresidential load;
  - zero usage on an occupied rental; or
  - zero consumption for more than 12 months on an irrigation service.
- Meters with no customer of record, or unidentified energy usage, will have a work order to disconnect service generated after 1,000 kWh are used.

**5. Does the company have specific goals regarding the identification and resolution of stopped meters and unidentified energy usage meters?**

Pacific Power's goal is to identify and resolve stopped meters and unidentified energy usage meters based on the criteria described in 4 above.

Under Pacific Power's Customer Service Guarantee Program, customer initiated inquiries related to billing or metering problems will be investigated and responded to within ten business days.

**6. What types of reports does the company generate to help identify stopped meter and unidentified usage meter problems?**

Pacific Power uses a Zero Consumption Report to identify meters that have readings and consumption that meet the criteria described in 4 above. The Company reviews the meter usage history for meters in the report to determine if a physical inspection of the meters is required. In addition to the Zero Consumption Report, Pacific Power uses other CSS logic to identify potential meter issues and suspend billing for manual review. When a meter reading triggers this additional billing suspend criteria, the customer's account is also manually reviewed to determine if a physical inspection of the meter is required. If a physical inspection is required, after the field personnel has verified a stopped meter situation, the billing department adjusts the billing in accordance with the Company's tariff Rule 10D.

For unidentified usage identification, Pacific Power's CSS runs a report every night to identify sites without an active customer that has cumulative consumption of 1,000 kWh since the last customer of record. For each identified site a work order is created. Field employees will visit these sites and will either disconnect the service or leave a notice indicating the service may be disconnected for lack of customer of record.


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Pacific Power appreciates the opportunity to provide these comments and looks forward to participating in the workshop scheduled for May 20, 2015. If you have any questions regarding these comments, please contact Barbara Coughlin, Director, Customer & Regulatory Liaison, at (503) 331-4306.

Sincerely,

  
R. Bryce Dalley  
Vice President, Regulation

Enclosures