

Date: November 3, 1999

To: Graciela Etchart

From: Carole Rockney, Robin Cross and Gene Cardon - PacifiCorp

Subject: Follow up Comments on Proposed Washington Rule Changes - Rules 480-90 & 100

At the recent workshops in Docket UE-990473, there were several items that participants were asked to follow up on. In response to that request, PacifiCorp's comments are included below. Let us know if you have any questions. We appreciate being able to participate in the recent workshop and believe the discussions were productive.

WAC 480-90-046 Application for Service

Request: Provide list of what is needed for proof of identification.

Response: (2)(d) The utility shall choose acceptable forms of identification. Acceptable forms of positive identification include:

- (1) A valid Washington driver's license or other state identification containing the customer or applicant's photograph or other identifying information such as name, date of birth, address; or
- (2) A U.S. passport, certificate of citizenship or naturalization, Immigration and Naturalization Service temporary resident card, employment authorization card or, military identification card; or
- (3) A combination of:
 - Birth certificate or social security card;
 - Current identification from school, employment or a state agency.

WAC 480-90-056 Refusal of Service

Request: Provide detailed information on amount of write-offs attributable to prior obligation.

Response: This data is not available, as our customer information system does not currently track write-offs directly attributable to the use of prior obligation. To give an indication of the direct affect that prior obligation has on the Company's write-offs, in 1998 Company write-offs for the state of Washington were 16% of the total Company's write-offs, while the Washington customer base is approximately 8% of the Company total. None of the other states served by PacifiCorp (Utah, Wyoming, Oregon, Idaho and California) have a prior obligation rule. We believe the high proportion of write-offs is due to the prior obligation rule.

AMD

WAC 480-90-xx5 Natural Gas Customer Notification Requirements

Request: Provide comments on lead time requirements; content of notice, posting in offices; describe what we currently do regarding notices; cost impact of proposed rule.

Response: PacifiCorp's current practice regarding customer noticing follows the rules set out in WAC 480-80-100 (Payment Agencies) and WAC 480-80-120 (Notice to the public of tariff changes). Our current practice is to post notices of tariff changes at all paystations. Verification that notices have been posted is kept at the Company's Keys Road office in Yakima for one year (Keys Road is also listed as the nearest customer office where customers may view both proposed and effective tariffs). Notice of tariff change letters are e-mailed or faxed to the employees who are responsible for posting within one day of filing with the Commission. This procedure allows at least 30 days posting before the proposed effective date. Currently, PacifiCorp does not notify customers of tariff changes via bill message. PacifiCorp would prefer to continue noticing customers through posting notices at paystations and/or customer offices with the option of a bill insert or message.

WAC 480-90-051 (1) Security Deposit Payment Date (and all other rule references to longer time frame for out-of-state mailing)

Request: Provide information on days required for out-of-state mailing.

Response: The proposed rule makes the assumption that it takes longer to deliver mail to a customer if mailed out of state. This assumption is out-of-date according to the U.S. Postal Service. Mail is not processed according to state boundaries. Mail is processed according to Regional Processing and Distribution Areas. These processing areas are called Section Center Facilities (SCF). Mail sent and delivered within an SCF has a service delivery commitment of one day. Mail sent from one SCF and delivered to another SCF (west of the Rockies) has a service delivery commitment of two days.

All of PacifiCorp's mail is sent from the Portland SCF. This SCF covers a geographic area from Longview, WA to south of Portland. It also covers the Oregon/Washington Coast out to The Dalles. Any customers with a mailing address within that SCF should receive mail in one day. Any customers with mailing addresses outside the SCF (but west of the Rockies) should receive mail in two days.

Mailing bills within the State of Washington would not reduce the time it takes to deliver mail to the customer unless the mail was sent from the customer's SCF. To mail from Vancouver, Washington would not get information in the hands of the customer any faster than mailing from Portland. In addition, the increased time from mailing outside the SCF would be one day which would not warrant the differentiation proposed by this rule.

WAC 480-90-071 (5) Medical Emergencies

Request: What is a reasonable amount of time within which to reconnect a customer with a “medical emergency” after receiving verbal or written notification of the existence of a medical emergency?

Response: PacifiCorp believes that reconnection within one day is a reasonable period within which to reconnect service for a “medical emergency.” Four hours would usually be attainable during normal business hours in a more urban area like Yakima where the Company has separate crews for connect/disconnect and lines and service operations. However, in after hours situations and in areas where the servicemen performs both functions and there are long distances between customers, four hours would be difficult to achieve. This would be especially true during outage situations.

WAC 480-90-051 Deposit Requirements

Request: How does the Company determine credit criteria?

Response:

We will require a deposit if one of the conditions exists:

- Customer has been cut for DNP in the last 12 months, for same class of service.
- Three or more delinquency notices served in the last 12 months.
- Service is being requested to a site where a prior customer still resides and a balance still exists.

WAC 480-90-211 Payment Locations

Request: How much cash is the Company currently collecting at payment stations. Any language change proposal for : “The natural gas utility must provide payment agencies in convenient locations where applicants and customers can make cash and urgent payments as needed to receive service.”

Response: The Company currently has nine paystation locations, eight of which are automated and one of which is manual where cash payments may be made. In addition, the Company has made available to customers eight drop box locations. The payment stations in Washington currently process approximately 2100 payments daily, averaging \$156,000 per day. Approximately fifty five percent of the payments are cash. The Company offers other payment options to customers including quick check, electric check, and credit card payments.