

**AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION**

JURISDICTION:	WASHINGTON	DATE PREPARED:	09/21/2015
CASE NO.:	UE-150204 & UG-150205	WITNESS:	Don F Kopczynski
REQUESTER:	Public Counsel/Energy Project	RESPONDER:	Larry La Bolle
TYPE:	Data Request	DEPT:	State & Federal Regulation
REQUEST NO.:	PC/EP – 090	TELEPHONE:	(509) 495-4710
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REQUEST:

Mr. La Bolle states “Ms. Alexander recognizes that Avista is already permitted to use AMI for credit disconnects in Washington.” Please provide the Commission order or other evidence that shows that the Commission has approved Avista’s use of remote disconnection in Washington.

RESPONSE:

Prior to any deployment of advanced metering, the Company was interested in installing remote disconnect devices on some of its meters as a way to reduce service costs in certain cases. While the Company interpreted the Washington rule for disconnection as not prohibiting such remote operation, Avista met with Commission Staff to explain its planned program and its interpretation of the rule. Staff agreed with the Company that remote service switching, in particular for nonpayment disconnects, was not barred by the rule. As the Company planned for the remote service switching associated with the Pullman project, Avista again met with Staff to reaffirm that there was no conflict with the Washington requirements, regarding remote service disconnects for credit issues.

Because the Washington rule does not prohibit the use of remote service switching, and the Commission is aware of the fact that we use such practices, there has been no need for any action by the Commission to approve its use. In addition to the authority to use remote switching for service disconnects, there have been no customer complaints filed with the Commission regarding the Company’s remote switching practices. Anecdotally, one of the features of remote switching that our customers value, is our ability to very-quickly restore service, compared with the practice of requiring a service person to travel to their premise to manually do so.

This rapid reconnect capability was among the several benefits associated with remote connection and disconnection that were noted by the Staff of the Idaho Public Utilities Commission in the recent Joint Petition filed by Avista and others, requesting an exemption from the requirement to physically be on the premise for credit related service disconnects. In the Final Order¹ approving the Joint Petition, the Commission noted the following comments of Commission Staff: “Staff says benefits of exempting Avista and Idaho Power from the rule and allowing them to remotely disconnect and connect customers include:

- Decreases opportunity for onsite conflicts between customers and utility;
- Increases field-employee safety by reducing the risk of physical harm or robbery;
- Increases certainty on when disconnection and reconnection will occur;

¹ Case Number GNR-U-14-01. February 17, 2015.

- Encourages customers to communicate with the utility call center to make payment arrangements, make the utility aware of a medical emergency, etc.;
- Reduces utilities' operating costs associated with field disconnection visits; and thus reduces upward pressure on rates for all customers; and
- Allows for quicker reconnection of service after the customer pays or makes payment arrangements.”

Avista's current billing practice in Washington, in compliance with WAC 480-100-128, includes the following steps. The bill is mailed and due within 15 calendar days, after which the Company allows a 3-day grace period for payments to post. A Past Due Notice (second notice) is mailed after the grace period ends, dated 7 calendar days later. The Final Notice (third notice) is mailed 3 business days before the past due notice expires. The Interactive Voice Response System (IVR) then calls the customer on the day the notice expires (3 attempts are made to get a live voice).