



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

August 1, 2013

VIA ELECTRONIC FILING

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

**Re: Docket No. U-131087
Comments of PacifiCorp**

Dear Mr. King,

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) submits the following comments in accordance with the Notice of Opportunity to File Written Comments dated July 1, 2013 in the above-referenced docket.

It is respectfully requested that all data requests be addressed in the following manner, with copies to the Company's counsel:

By Email (preferred): datarequest@pacificorp.com

By Regular Mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Please direct any informal inquiries to Barb Coughlin, Director, Customer & Regulatory Liaison, at (503) 331-4306.

Sincerely,

William R. Griffith
Vice President, Regulation

Enclosures

cc: Rayne Pearson

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER &
LIGHT

Inquiry to Consider Whether Changes to
WACs 480-100-128(6)(k) and 480-90-
128(6)(k) are Warranted

DOCKET U-131087

PACIFICORP'S AUGUST 1, 2013
COMMENTS IN SUPPORT OF
REVISIONS TO WACs 480-100-128(6)(k)
AND 480-90-128(6)(k)

1. In accordance with WAC 480-07-143 and the Notice of Opportunity to File Written Comments dated July 1, 2013 (Notice), PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company), provides the following comments to the Washington Utilities and Transportation Commission (Commission) in support of revisions to WACs 480-100-128(6)(k) and 480-90-128(6)(k), which require employees performing disconnection of service accept payment from customers at the service address.
2. PacifiCorp is an electrical company and public service company doing business in the state of Washington under RCW 80.04.010 and is subject to the jurisdiction of the Commission with regard to its public utility operations, retail rates, service, and accounting practices. The Company also provides retail electricity service under the name Pacific Power in Oregon and California and under the name Rocky Mountain Power in the states of Utah, Wyoming, and Idaho. PacifiCorp's principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon, 97232.
3. PacifiCorp's name and address:

PacifiCorp Washington Dockets
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Washington.Dockets@PacifiCorp.com

Michelle R. Mishoe
Senior Counsel
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Portland, OR 97232
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michelle.mishoe@pacificorp.com

In addition, PacifiCorp respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred)

datarequest@pacificorp.com

By regular mail

Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Barb Coughlin, Director, Customer & Regulatory Liaison, at (503) 331-4306.

GENERAL COMMENTS

4. WAC 480-100-128(6)(k) requires Company employees dispatched to disconnect electric service for nonpayment to accept payment from customers:

(k) A utility representative dispatched to disconnect service must accept payment of a delinquent account at the service address, but will not be required to give change for cash paid in excess of the amount due and owing. The utility must credit any over-payment to the customer's account. The utility may charge a fee for the disconnection visit to the service address if provided for in the utility's tariff; (emphasis added)

5. After reviewing increased documented threats, incidents with other utility workers across the country, workplace violence statistics, payment methods available to customers and current best practices, PacifiCorp concluded field employees who carry money or collect money from customers have the potential to experience a hostile interaction leading to injury, or even worse, death. Field employees who are known to carry money in their vehicle or on their person are inherently at greater risk for being attacked and robbed as they travel their daily route.

6. PacifiCorp supports the opening of a rulemaking to change WACs 480-90-128(6)(k) and 480-100-128(6)(k) to allow utilities to reduce risk of harm to employees carrying money throughout their workday, eliminate a way for customers' personal banking information to be stolen and used fraudulently, and eliminate an opportunity for theft of cash. A simple change of the word "must" to "may" in WACs 480-90-128(6)(k) and 480-100-128(6)(k) would *allow* rather than *require* a utility to collect payment of delinquent accounts at the service address:

(k) A utility representative dispatched to disconnect service ~~must~~ may accept payment of a delinquent account at the service address, but will not be required to give change for cash paid in excess of the amount due and owing. The utility must credit any over-payment to the customer's account. The utility may charge a fee for the disconnection visit to the service address if provided for in the utility's tariff; (*emphasis added*)

EMPLOYEE SAFETY

7. PacifiCorp's initial interest in revising practices for collecting payments in the field was prompted by a disturbing incident that took place on June 26, 2012, in Mississippi. Mr. Nathan Baker, a collector with East Mississippi Electric Power Association went to a customer's premise to disconnect service. Mr. Baker was later found dead, having been beaten by a shovel and shot in the back.
8. As a result of this particular incident PacifiCorp re-evaluated existing Company safety policies for its field collections personnel. Safety is a top priority for the Company and business practices allowing for the risk of injury or death to an employee as a result of workplace violence must be revised to provide a safer working environment.
9. PacifiCorp has a responsibility and a duty to provide a safe working environment for its employees. The Occupational Safety and Health Administration (OSHA) requires employers to furnish each employee a place of employment free from recognized hazards

that can be considered harmful to an employee¹. OSHA also recognizes workplace violence as a hazard having the potential to disrupt the safety of a workplace and offers guidance on mitigating the potential for workplace violence.² Additionally, multiple governmental agencies have researched workplace violence and provided useful information and statistics regarding workplace violence, including identification of factors leading to higher risk of violence to occur. Additional information from government sources regarding workplace violence is provided in Exhibit A attached.

10. The Bureau of Labor Statistics (BLS) reported a total of 458 fatal work injuries as a result of homicide in 2011. Of that number, BLS reported that “robbers” were the assailants in 22 percent of female worker homicides and over one third of male worker homicides³.

11. Fortunately, PacifiCorp has not experienced a tragic incident such as the one in Mississippi. However, the Company has been monitoring these types of incidents across the nation as well as the threats and incidents reporting by its personnel. The number of threats or incidents has increased from year to year. PacifiCorp has collected the following information regarding physical incidents and threats made against Company employees:

Year	Physical Incidents	Specific Type of Verbal Threat				Total Incidents & Threats Reported
		Guns, Knives, other Weapons	Letting Loose Dogs	Damaging Company Facilities	General	
2010	1	4	0	0	6	11
2011	0	10	2	1	8	21
2012	5	11	3	3	8	30
2013 YTD	8	6	1	1	8	24

¹ OSHA General Duty Clause, 5(a)(1)

² <https://www.osha.gov/SLTC/workplaceviolence/>.

³ Bureau of Labor and Statistics, Census of Fatal Occupational Injuries Summary, 2011

12. PacifiCorp has thirteen recorded physical incidents in 2012 and 2013. Of the thirteen physical incidents, one involved a customer spitting on an employee and then slamming the Company truck door on the employee's leg, one involved a pit-bull attack, one involved a customer attempting to engage the employee in a fist fight, one was an unspecified physical attack on a meter reader, one involved an employee being sprayed by a water hose while driving then being spit on and eight involved a customer brandishing a firearm. **Four incidents in particular noted the customer pointed the firearm directly at the employee.** Details of reported threats or incidents are attached at Exhibit B.

13. While a rule change and change in Company policy will not eliminate all risk to employees, eliminating the requirement for employees to accept payment at a service address will significantly reduce the possibility of workplace violence, period. Eliminating the requirement to accept payment at the service address eliminates the opportunity for tense face-to-face interaction. Further, eliminating this requirement will mean that employees do not carry payments with them throughout the workday. For practical reasons, employees who collect payments in the field generally deliver those to a pay station periodically throughout the day or at the end of the day. Eliminating payment in the field reduces the risk that a member of the general public will commit theft.

14. PacifiCorp is constantly reviewing its policies for ways to improve safety for its employees. An illustration of another policy introduced by the Company to reduce risk to employees is the use of cell phones while driving. PacifiCorp implemented a "zero tolerance" policy when it comes to employees using cell phones while operating a vehicle. Employees must not use cell phones while driving during work hours or while

driving a work vehicle. While this policy is widely supported and is proven to help minimize the risk of an accident and ensure better safety for employees, it will not prevent all vehicle accidents from occurring. The Company's intention to stop collecting payment at the door during a disconnection visit will not remove all risk, but is a proactive approach towards minimizing the risk and providing a safer workplace. Injuries or death to employees should not be an accepted cost of doing business, nor should it be the inevitable result of one's chosen occupation.

CUSTOMERS WILL NOT BE HARMED BY A CHANGE IN THE RULE

Noticing Prior to Disconnection

15. Disconnecting electric service for non-payment is always a utility's last resort. PacifiCorp provides customer with multiple notifications of account balances and potential disconnection of service. Specifically, the Company provides the following before a site visit to disconnect service:

1. Monthly bill showing amount due and due date,
2. Past due notice and the next month's bill showing new charges, clearly indicating the account is past due, the past due amount and the due date of the past due amount,
3. Final notice indicating the past due amount and due date for the past due amount,
4. Courtesy outbound call, and
5. Courtesy door hanger left at the service address 48 hours prior to date of disconnection.

Currently, if payment is not received or a payment arrangement is not made following the notifications outlined above, a field collector visits the service address. The field

collector knocks on the door prior to the disconnection. If the customer responds to the knock on the door, the customer may make payment, make payment arrangements if eligible, or is advised of the disconnection. If no payment is made, service is disconnected. If the customer does not respond to the knock on the door, a door hanger is left and the field collector proceeds with the disconnection. If payment is received from a customer, it is kept with the field collector until he or she is able to visit a pay station, which is often at the end of the work day.

16. This billing and collection process provides customers with numerous notifications using various communications methods prior to the disconnection visit, giving ample time to arrange for a payment to be made prior to the Company visiting the site.

Pacific Power Offers Numerous Ways to Pay Electric Bills

17. Customers choosing to pay at the door during the site visit for disconnection of service use the most expensive payment option available. PacifiCorp offers a number of no-cost or low-cost payment methods for customers. Over the past decade technological advances have allowed customers to utilize newer, more convenient payment methods. Currently, PacifiCorp receives 37 percent of payments via the postal service, while 63 percent are received through other means. PacifiCorp offers the following payment methods:

1. Automatic payments through the customer's bank – no fee.
2. Online payment through the Company's website, available 24 hours a day, seven days a week – no fee.
3. U. S. Mail – cost of a stamp plus the cost of a check or money order.

4. Pay stations: The Company has 20 available pay stations in Washington (see Exhibit C for a list of pay stations, locations, and hours of business). Of the 20 pay stations, 15 are open seven days a week, four are open six days a week, and one pay station is open Monday through Friday (from 8:00 a.m. until 7:00 p.m.). Of the 20 pay stations, fifteen pay stations – \$1.00 fee; five pay stations – no fee.
5. Pay-by-telephone available 24 hours a day, seven days a week – \$2.95 fee.
6. Pay at time of disconnection visit – \$15 fee.

Online and pay-by-telephone payment options allow customers to make payment from their own residence or through their mobile phones (including smartphones), and provide almost immediate account updating.

Customers Who Pay at the Door

18. During 2012, there were 298,919 payments processed by the Company's pay station network in Washington. This compares to 856 payments being collected in the field at the time of disconnect. While the majority of PacifiCorp customers choose no- and low- cost options described above, other customers have chosen to utilize the *most expensive payment option*, paying the collector at the door at the time of disconnection. Those customers making payment at the time of disconnection pay a field visit charge of \$15.00.
19. The 856 payments taken during a disconnect visit represented 674 customers. This means 182 payments, or 21 percent, were repeat customers using the field collector as a payment method. Of the 674 unique customers, 656 (or 97 percent) had a phone number listed on their account as a means to contact them, and this phone number would be used to place the courtesy outbound phone call.

20. Further, the Company reviewed records for the 674 customers to determine if they had received energy assistance in the last year or were on the Company's low income rate, Schedule 17, the Low Income Bill Assistance Program—Residential Service—Optional for Qualifying Customers. The total number of customers identified as low income who made payment at the door at the time of disconnection is 138. This represents approximately 20 percent of the customers who paid at the door in 2012 and these customers would have been subject to the \$15 field visit fee.
21. Further, on average, the Company performs 25 disconnects per month in Washington for customers who have been identified as low-income. For 2012, the average time between the disconnection of service and the reconnection of service for low-income customers was 22.73 hours. This does not support the contention that low-income customers have no means to make payment other than at the door. We do not believe low-income customers will be unduly burdened by eliminating the option of paying a field collector at the time of disconnection.

Accessibility to Bank Options

22. In response to comments provided by Staff, Public Counsel, and the Energy Project and questions raised by the Commissioners in PacifiCorp's Docket UE-130545 during the May 30, 2013 open meeting, PacifiCorp gathered data specific to banking options and internet access for consumers, with particular focus on the low-income population served by the Company.
23. Staff suggests in Docket UE-130545, that Pacific Power "ignores the realities of the 'unbanked' segment of the population, which is largely low-income" and "more than 40 percent of low-income households are without bank accounts",⁴ citing a 2011 FDIC

⁴ Staff Response to Pacific Power Petition, Page 2, Section 2, Paragraph 1.

National Survey of Unbanked and Underbanked Households. The Company reviewed the 2011 FDIC National Survey and offers the following in response:

- The 40 percent “unbanked” population represents those with an income of \$0 to \$30,000 per year, nationwide. This number is not specific to Washington residents.⁵
- Washington is in the lowest, first Quintile (1.89 percent to 4.48 percent).⁶
- Distribution of Unbanked Households by Income and Demographic Characteristics:⁷

<u>Income less than \$15,000</u>	
South	47.2%
Midwest	21.4%
West	16.5%
Northeast	14.9%
<u>Income between \$15,000 and \$30,000</u>	
South	44.0%
West	22.6%
Midwest	16.9%
Northeast	16.5%

- Washington has the eleventh lowest unbanked population at 4.5 percent. The national average is 8.2 percent.⁸ The following is a list of states with the lowest percentages of unbanked population:

All US Households	8.2%
Washington	4.5%
Iowa	4.4%
South Dakota	4.4%
Oregon	4.3%
Minnesota	4.1%
Hawaii	3.8%
Nebraska	3.7%
Maine	3.7%
Vermont	3.4%
Utah	2.8%
New Hampshire	1.9%

⁵ 2011 FDIC National Survey of Unbanked and Underbanked Households, at 16.

⁶ Figure 3.4A, 2011 FDIC National Survey of Unbanked and Underbanked Households, at 13.

⁷ Table B-5, 2011 FDIC National Survey of Unbanked and Underbanked Households, at 112.

⁸ Table C-1, 2011 FDIC National Survey of Unbanked and Underbanked Households, at 126.

24. Staff notes the most common reason households report they do not have a bank account is cost associated with bank account minimum requirements and bank fees.⁹ The following information is taken from the 2011 FDIC National Survey, Table A-25, Reason Household is unbanked by Household Income:¹⁰

<u>Income less than \$15,000</u>	
Do not have enough money	38.5%
Do not need or want one	20.1%
Other/None of the Above	13.0%
<u>Income between \$15,000 and \$30,000</u>	
Do not have enough money	27.7%
Do not need or want one	22.6%
Other/None of the Above	12.6%

Bank account fees or minimum balance requirements being too high received 4 percent and 7 percent in the respective categories listed above.

- Additionally, approximately 64.9 percent of unbanked households use alternative financial services (AFS) such as money orders, check cashing, and remittances. “Unbanked and underbanked households value the convenience of transaction AFS and perceive AFS credit to be easier to obtain than bank credit. The most common reason households use transaction AFS is convenience.” The survey also notes the increase in prepaid debit card use with one in ten households reporting use of a prepaid debit card, climbing from 12.2 percent to 17.8 percent in unbanked households in 2011.¹¹

⁹ Staff Response to Pacific Power Petition, Page 2, Section 2, Paragraph 2.

¹⁰ 2011 FDIC National Survey of Unbanked and Underbanked Households, at 71.

¹¹ 2011 FDIC National Survey of Unbanked and Underbanked Households, at 6.

25. As of May 2011, new Social Security beneficiaries were required to choose an electronic payment option.¹² On March 1, 2013, the United States Treasury department stopped mailing paper checks to Social Security recipients. Retirees are required to choose to have their Social Security payments either directly deposited into a bank or credit union account, into an electronic transfer account or loaded onto a prepaid Direct Express Debit MasterCard. In 2012, prior to the implementation of the new electronic requirement, 83 percent of recipient payments were already being made electronically to a bank or credit union account, electronic transfer account or prepaid debit card. The Social Security Program Annual Report expanded on the expectation for social security recipients to receive payment electronically rather than by check, “Electronic receipt of benefits increased significantly in 2012 and is expected to continue to increase significantly in the next year as most SSI recipients must receive their benefit payments by direct deposit, the DirectExpress debit card, or an electronic transfer account, effective March 2013.”¹³

26. Based on this information, eliminating the requirement to collect payment in the field at the time of disconnect would not harm customers.

Accessibility to Internet Access

27. The Company also researched internet access for customers with focus on broadband use in the state, access to internet outside of the residence and internet access via smartphone, with additional focus on the low-income population. The Company considers the online payment option the best option for customers, as there is no charge to the customer to pay online, the payment is quickly updated to the customer’s account

¹² 31 CFR Part 208, Management of Federal Agency Disbursements

¹³ 2013 Annual Report of the SSI Program, II. Highlights.

and the customer can make use of the option from their home, a mobile device or anywhere internet access may be available, such as a public library.

28. Based on a report from the Washington State Broadband Office, *2012 Annual Report on Broadband in Washington*, 83.6 percent of the population in Washington lives in households with internet access. Washington ranks third in the nation for internet access in the home. Additionally, the report indicates 45 percent of residents over three years old have access to the internet outside the home. Although household customers with an income of less than \$30,000 per year have a lower adoption of broadband (75 percent), households with an income of less than \$30,000 per year have seen a significant increase in cell phone use, increasing from 25 percent in 2009 to 50 percent in 2012.¹⁴
29. PacifiCorp performed further research regarding internet use and the rising use of mobile devices, see Exhibit D. Internet use for adults with a household income of less than \$30,000 per year increased from 28 percent in June 2000 to 62 percent in August 2011. The Company also saw a rise in mobile technology help people access the internet, with 50 percent of households with incomes less than \$30,000 per year go online wirelessly. Smartphone ownership for low-income adults less than \$30,000 increased 12 percent from 2011 to 2012.

WHAT OTHER UTILITIES ARE DOING

30. PacifiCorp has stopped collecting payment in the field in Utah, Wyoming, and California. Prior to changing the Company's policy regarding field personnel collecting payments, the Company conducted an informal survey of utilities across the nation from members of the National Association of Credit Managers. PacifiCorp received 52 responses from various utilities across the United States and Canada. Based on the

¹⁴ Washington State Broadband Office, *Broadband in Washington*, 2012 Annual Report.

information gathered from the responses, more than half of the utilities did not knock on the door prior to disconnecting service and near 75 percent of the utilities did not collect payment. See Exhibit E for these responses.

31. PacifiCorp contacted several municipalities, public utility districts and rural electric associations providing service in Washington to inquire about whether they accept payment in the field prior to disconnection. The following table summarizes the responses:

Utility	Knock	Collect Payment
Clark PUD	Yes	Yes
Seattle City Light	No	No
City of Walla Walla	No	No
Benton REA	No	No
City of Yakima	Yes	No

32. The Commission has addressed through other tariff filings the particular matter of utility employees being required to accept payment at the time of disconnection. Avista has implemented remote disconnection capabilities which would inherently stop the disconnection visit and payment of the past due bill at the door. Further, both Avista and Cascade Natural Gas have filed tariff changes that were approved, giving each utility the ability to no longer accept cash payment at the door.

PACIFICORP EXPERIENCE IN UTAH, WYOMING, AND CALIFORNIA

33. PacifiCorp has stopped accepting payment at the time of disconnection in its Utah and Wyoming service territories and is currently rolling out the same change in its California service territory. PacifiCorp has found, through first-hand experience in Utah and Wyoming, customers are very accepting of the concerns the Company has for the safety of its field personnel and have been very understanding of this policy change. To

date, the Company has not received any escalated customer issues or commission complaints due to the change in business practice from these states.

34. In preparation for the change, the Company conducted a two-month communications campaign to inform customers with past due balances of this new practice. A combination of bill messages on bills with past due account balances, door hanger messaging, and individual handouts given to customers by collectors and managers communicating this change to its customers with past due balances were used (see Exhibit F). Call center representatives communicated the information to customers calling the Company regarding past due balances. The Company will be able to draw from this experience and launch a similar communications campaign in Washington when the rule is changed or the Company's waiver petition is approved.

CLOSING COMMENTS

35. PacifiCorp encourages the Commission to initiate a rulemaking proceeding to make revisions to WACs 480-100-128(6)(k) and 480-90-128(6)(k), to eliminate the requirement for utilities to accept payment at the time of disconnection of service. Eliminating this payment method will increase safety for employees without sacrificing customer service. Further, the requirement to collect payment in the field prior to disconnect is not contained in statute. The Commission implemented the requirement as a policy decision and has the flexibility to update its policies as experience shows it to be necessary.

DATED: this 1st day of August, 2013.

Respectfully submitted,

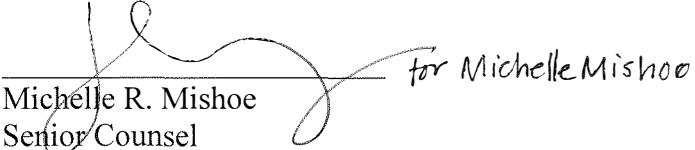

Michelle R. Mishoe
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825 NE Multnomah Street, Ste 1800
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Exhibit A

Exhibit A

Recognized Risk Factors- Exchange, Carrying or Handling Money

Occupational Safety & Health Administration (OSHA), Fact Sheet on Workplace Violence:

How can the employees protect themselves?

These steps, however, can help reduce the odds:

Carry only minimal money and required identification into community settings.

http://www.osha.gov/OshDoc/data_General_Facts/factsheet-workplace-violence.pdf

National Institute for Occupational Safety & Health (NIOSH), Intelligence Bulletin 57, Violence in the Workplace:

Violence is a substantial contributor to occupational injury and death, and homicide has become the second leading cause of occupational injury death. Each week, an average of 20 workers are murdered and 18,000 are assaulted while at work or on duty. Nonfatal assaults result in millions of lost workdays and cost workers millions of dollars in lost wages.

Risk factors for workplace violence include dealing with the public, the exchange of money and the delivery of services or goods. Prevention strategies for minimizing the risk of workplace violence include (but are not limited to) cash-handling policies, physical separation of workers from customers,...

<http://www.cdc.gov/niosh/docs/96-100/>

United States Department of Labor, Webpage, Workplace Violence

Who is at risk of workplace violence?

Research has identified factors that may increase the risk of violence for some workers at certain worksites. Such factors include exchanging money with the public...

Among those with higher risk are works who exchange money with the public...

OSHA encourages employers to develop additional methods as necessary to protect employees in high risk industries.

<http://www.osha.gov/SLTC/workplaceviolence/>

U.S. Department of Justice, Federal Bureau of Investigation, Workplace Violence, page 13:

...occupational safety specialists and other analysts have broadly agreed that responding to workplace violence requires attention to more than just an actual physical attack...

Prevention programs that do not consider harassment in all forms and threats are unlikely to be effective. While agreeing on that broader definition of the problem, specialists have also come to a consensus that workplace violence falls into four broad categories.

Type 1, violence by criminals otherwise unconnected to the workplace accounts for the vast majority—nearly 80 percent—of workplace homicides. In these incidents, the motive is usually theft, and in a great many cases, the criminal is carrying a gun or other weapon, increasing the likelihood that the victim will be killed or seriously wounded. This type of violence falls heavily on particular occupational groups whose jobs make them vulnerable: taxi drivers (the job that carries by far the highest risk of being murdered), late-night retail or gas station clerks, and others who are on duty at night, who work in isolated locations or dangerous neighborhoods, and who carry or have access to cash.

<http://www.fbi.gov/stats-services/publications/workplace-violence>

Exhibit B

EXHIBIT B- THREATS TO EMPLOYEES

DATE REPORTED	STATE	INTERNAL WORK	THREAT	WEAPON	THREAT DESCRIPTION
01.03.2013	OR	FORESTRY	VERBAL	NO	Employee being stalked by random person
01.09.2013	OR	VEGETATION	VERBAL	YES	Willing to Shoot Employee with Buckshot
01.20.2013	OR	FACILITIES	VERBAL	YES	Threatening to blow up a non specified building
01.22.2013	UT	COLLECTIONS	VERBAL	YES	Customer ran inside home yelling "I'm getting my gun"
01.23.2013	UT	COLLECTIONS	VERBAL	YES	Willing to use Concealed Carry Permit
01.23.2013	UT	METER	VERBAL	YES	Customer threatened to shoot meter reader
01.24.2013	WY	METER	PHYSICAL	YES	Customer exited house with shotgun aimed at Employee threatening to shoot
01.24.2013	UT	METER	VERBAL	NO	Customer threatened meter reader
01.29.2013	WA	COLLECTIONS	VERBAL	NO	Customer made threat to any employee who shows up to disconnect service
02.20.2013	UT	METER	VERBAL	YES	Will intentionally use dogs to attack Employee
02.11.2013	OR	COLLECTIONS	VERBAL	NO	Will fight Pacifcorp employees if they come onto his property
02.18.2013	OR	METER	PHYSICAL	YES	Will put a bullet through the meter reader's head
03.11.2013	UT	DISCONNECT	VERBAL	NO	Employee will need to have a police escort if he comes to disconnect service
03.24.2013	ID	COLLECTIONS	VERBAL	NO	Customer stated he will come down to the office and grab someone by the neck.
04.08.2013	OR	DISCONNECT	VERBAL	NO	Customer stated he will strangle a baby
04.17.2013	OR	METER	PHYSICAL	NO	Threatening to fist fight
05.07.2013	WA	COLLECTIONS	PHYSICAL	NO	Customer sprayed hose on employee and spat on employee
05.10.2013	CA	VEGETATION	PHYSICAL	YES	Individual Brandishing weapon at Helicopter monitoring right of ways
05.22.2013	OR	METER	VERBAL	YES	Customer states he is in commando mode and has guns in his house
05.31.2013	OR	METER	VERBAL	NO	Employee was asked if he has ever been shot
06.11.2013	OR	VEGETATION	PHYSICAL	YES	Threatening to shoot anyone who comes onto property
07.03.2013	OR	COLLECTIONS	PHYSICAL	YES	Brandishing weapon
07.16.2013	WA	WIRES	PHYSICAL	YES	Employee followed by local resident in golf cart, resident was brandishing a firearm
07.23.2013	WA	COLLECTIONS	VERBAL	YES	Customer would shoot anyone trying to enter the property

DATE REPORTED	STATE	INTERNAL WORK	THREAT	WEAPON	THREAT DESCRIPTION
01.04.2012	OR	METER	VERBAL	NO	Customer threatened to release his dog
01.09.2012	UT	METER	VERBAL	NO	General threat to use gun against employees and police
01.24.2012	UT	COLLECTIONS	VERBAL	NO	Threatened to tie pit bull to meter
01.31.2012	OR	COLLECTIONS	PHYSICAL	NO	Customer spit on employee and slammed his leg in his truck door
02.07.2012	OR	VEGETATION	VERBAL	NO	Customer threatened crews and Deputies
02.09.2012	UT	CALL CENTER	VERBAL	NO	Customer upset about apparent outage - threatened to burn our building down
02.09.2012	OR	COLLECTIONS	VERBAL	NO	Customer threatened to cut the collector's head off - customer arrested by Sheriff
02.16.2012	UT	COLLECTIONS	VERBAL	NO	Customer threatened kill Call Agent
02.16.2012	UT	COLLECTIONS	VERBAL	NO	General threat to Call Agent concerning Collector
02.29.2012	OR	COLLECTIONS	VERBAL	NO	General threat to Call Agent concerning Collector
02.29.2012	UT	COLLECTIONS	VERBAL	NO	Threatened to tie pit bull to meter
03.03.2012	OR	COLLECTIONS	VERBAL	NO	Customer threatened to commit suicide (**NOT INCLUDED IN THREAT COUNT**)
03.14.2012	UT	COLLECTIONS	VERBAL	NO	Customer made general threat to a call agent over collection notices. Referenced gun.
03.16.2012	UT	LINE CREWS	VERBAL	NO	Customer threatened to excavate the UG line running through his property.
04.05.2012	ID	COLLECTIONS	VERBAL	NO	Customer threatened to shoot collector - also threatened to punch employee
04.06.2012	OR	METER	PHYSICAL	YES	Employee escorted off property by customer at gunpoint
05.17.2012	OR	COLLECTIONS	VERBAL	NO	Customer threatened employees - promised to "get 'em", "find where you live"
05.20.2012	OR	COLLECTIONS	VERBAL	NO	Customer threatened to take his own life (**NOT INCLUDED IN THREAT COUNT**)
05.29.2012	OR	COLLECTIONS	VERBAL	NO	General threat to Call Agent concerning Collector
06.10.2012	OR	VEGETATION	VERBAL	NO	General threat to Vegetation Management - mentally unstable
06.13.2012	OR	LINE CREWS	VERBAL	YES	First responder threatened with a gun
06.21.2012	UT	METER	VERBAL	NO	General threat to Call Agent toward crews
06.28.2012	UT	COLLECTIONS	VERBAL	NO	Customer threatened to shoot anyone who came to disconnect
07.05.2012	OR	Meter	PHYSICAL	YES	Customer threatened serviceman with a gun. Servicemen had just pulled the meter from the meterbase. Serviceman ran for safety, and called 911. Suspect fled in vehicle
07.12.2012	UT	METER	VERBAL	NO	Customer threatened to blow up / destroy the transformer box in his front yard.
07.25.2012	OR	COLLECTIONS	VERBAL	NO	Customer threatened to "blow off his head" (**NOT INCLUDED IN THREAT COUNT**)
08.01.2012	ID	COLLECTIONS	VERBAL	YES	Customer threatened to shoot collector
08.02.2012	OR	METER	VERBAL	NO	Customer stated meter reader was "lucky he did not get shot" accessing her property
08.06.2012	OR	COLLECTIONS	VERBAL	NO	Threat made to "beat up" collector
08.08.2012	OR	METER	PHYSICAL	NO	Customer physically attacked meter reader - meter reader avoided being harmed
08.28.2012	OR	VEGETATION	VERBAL	YES	Customer threatened crews and deputy with firearm he had in his possession
09.12.2012	UT	COLLECTIONS	VERBAL	YES	Customer stated he would be cleaning his guns in back yard if collector came back.
10.03.2012	OR	METER	PHYSICAL	YES	Pitbull attacked meter reader, customer then told the meter reader to "bring it on"

DATE REPORTED	STATE	INTERNAL WORK	THREAT	WEAPON	THREAT DESCRIPTION
01.04.2011	UT	COLLECTIONS	VERBAL	NO	Customer threatened to shoot collector
01.12.2011	UT	COLLECTIONS	VERBAL	NO	General threat to collector
01.18.2011	OR	COLLECTIONS	VERBAL	NO	Customer threatened to shoot collector
01.24.2011	OR	VEGETATION	VERBAL	YES	Threatened to hold employees at gunpoint until Sheriff arrives
03.03.2011	WA	COLLECTIONS	VERBAL	NO	Customer threatened to "beat collector to a pulp"
03.04.2011	CA	VEGETATION	VERBAL	NO	General threat to Vegetation Management
03.17.2011	OR	VEGETATION	VERBAL	NO	General threat to Vegetation Management - unstable
04.13.2011	UT	COLLECTIONS	VERBAL	NO	General threat to collector
04.27.2011	UT	COLLECTIONS	VERBAL	NO	General threat to collector
04.28.2011	OR	COLLECTIONS	VERBAL	NO	Threatened to "club" anyone who came to his property
06.02.2011	WY	LINE CREWS	VERBAL	NO	Threatened to cut down a pole on his property
06.06.2011	UT	COLLECTIONS	VERBAL	NO	Customer threatened to "answer her door with a shotgun"
07.11.2011	OR	COLLECTIONS	VERBAL	NO	General threat to Call Agent concerning Collector
07.29.2011	OR	LINE CREWS	VERBAL	NO	Threatened to shoot at our helicopters
08.03.2011	ID	COLLECTIONS	VERBAL	NO	General threat to Call Agent concerning Collector
08.11.2011	UT	COLLECTIONS	VERBAL	NO	Threatened to "blow us up" and verbally abused call agent
09.08.2011	OR	METER	VERBAL	NO	Threatened w/pit bull and to attack any employee - reconnected own power
10.27.2011	OR	COLLECTIONS	VERBAL	NO	Threatened to "blow us up" and verbally abused call agent
11.10.2011	UT	COLLECTIONS	VERBAL	NO	Threatened to tie pit bull to meter
11.17.2011	OR	METER	VERBAL	YES	Threatened to shoot employee if he came over fence again
12.23.2011	WY	LINE CREWS	VERBAL	NO	Threatened to shoot our employees

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01.06.2010	CA	VEGETATION	VERBAL	NO	General threat to Vegetation Management
01.09.2010	WA	FIELD	VERBAL	NO	Customer threat to field employee
02.11.2010	UT	VEGETATION	PHYSICAL	NO	Threat to Vegetation Management - physically attacked
03.23.2010	CA	COLLECTIONS	VERBAL	YES	Customer threatened to shoot collector
03.31.2010	UT	COLLECTIONS	VERBAL	YES	Customer threatened to shoot collector
05.10.2010	UT	METER	VERBAL	NO	Threatened to kill Meter Reader if he hit his aggressive dog
05.19.2010	OR	VEGETATION	VERBAL	NO	General threat to Vegetation Management
05.14.2010	OR	METER	VERBAL	NO	General threat to Call Agent concerning Meter Reader
09.01.2010	OR	VEGETATION	VERBAL	NO	General threat to Vegetation Management
10.21.2010	UT	COOL CASH	VERBAL	YES	Customer threatened over the phone to stab representatives
11.29.2010	CA	COLLECTIONS	VERBAL	NO	General threat to collector
12.16.2010	OR	METER	VERBAL	NO	General threat to Call Agent concerning Meter change out

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Exhibit C

Exhibit C- Pay-station Locations & Hours

Name	Address	City	ST	Zip	Hours	Status
ALBERTSONS #249	1610 W. LINCOLN	YAKIMA	WA	98902	M-Sun 0900-2000	Free to customers
BLUE SKY MARKET	330 NORTH ST.	MABTON	WA	98935	M-Sat 0600-2100 Sun 0700-2100	Free to customers from January to April. Fee to customers starting on May 1, 2013.
BLUE SKY MARKET	116 CHEHALIS AVE.	TOPPENISH	WA	98948	M-Sun 0600-2130	Free to customers from January to April. Fee to customers starting on May 1, 2013.
CLIFF'S TV & VIDEO	114 ELM ST.	GRANDVIEW	WA	98930	M-F 0830-1730 Sat 0830-1200	Free to customers from January to April. Fee to customers starting on May 1, 2013.
COWICHE HARVEST FOODS	16850 SUMMITVIEW RD.	COWICHE	WA	98923	M-Sun 0800-2000	Free to customers from January to April. Fee to customers starting on May 1, 2013.
DAYTON MERCANTILE	516 W. MAIN	DAYTON	WA	99328	M-F 0800-1900	Free to customers
EL MERCADO GRANDVIEW	206 EUCLID RD.	GRANDVIEW	WA	98930	M-Sun 0700-2200	Free to customers from January to April. Fee to customers starting on May 1, 2013.
FIESTA FOODS OF SUNNYSIDE	2010 YAKIMA VALLEY HWY.	SUNNYSIDE	WA	98944	M-Sun 0800-2200	Free to customers from January to April. Fee to customers starting on May 1, 2013.
FIESTA FOODS OF YAKIMA	1008 E. NOB HILL BLVD.	YAKIMA	WA	98901	M-Sun 0800-2200	Free to customers from January to April. Fee to customers starting on May 1, 2013.
MI PUEBLO SUPER MARKET	511 N. 1ST ST. #113	YAKIMA	WA	98901	M-Sun 0800-2000	Free to customers from January to April. Fee to customers starting on May 1, 2013.
PIT STOP	10121 US HIGHWAY 12	NACHES	WA	98937	M-Fri 0500-2200 Sat-Sun 0600-2200	Free to customers from January to April. Fee to customers starting on May 1, 2013.
QUICKPICK	401 S. ELM ST.	TOPPENISH	WA	98948	M-Fri 0800-2000 Sat-Sun 0900-1800	Free to customers
SELAH RED APPLE MARKET	121 EAST 3RD AVENUE	SELAH	WA	98942	M-Sun 0700-2000	Free to customers from January to April. Fee to customers starting on May 1, 2013.

Exhibit C- Pay-station Locations & Hours

Name	Address	City	ST	Zip	Hours	Status
SELAH SAVE-ON-FOODS	800 N. PARK CENTER	SELAH	WA	98942	M-Sun 0700-2200	Free to customers from January to April. Fee to customers starting on May 1, 2013.
SUNNYSIDE CASH MART	1805 S. FIRST ST.	SUNNYSIDE	WA	98944	M-Sat 0900-1700	Free to customers
WALLA WALLA HARVEST FOODS	905 SOUTH SECOND	WALLA WALLA	WA	99362	M-Fri 1000-1800 Sat 1100-1500	Free to customers
WAPATO INTERNATIONAL MARKET	512 WEST FIRST STREET	WAPATO	WA	98951	M-Sat 1000-1800	Free to customers from January to April. Fee to customers starting on May 1, 2013.
WRAY'S FOOD AND DRUG	5605 SUMMIT VIEW	YAKIMA	WA	98908	M-Sat 0745-2100 Sun 0800-1900	Free to customers from January to April. Fee to customers starting on May 1, 2013.
WRAY'S THRIFTWAY	7200 WEST NOB HILL	YAKIMA	WA	98908	M-Sun 0745-2030	Free to customers from January to April. Fee to customers starting on May 1, 2013.
WRAY'S THRIFTWAY	401 WEST NOB HILL	YAKIMA	WA	98902	M-Sun 0730-2015	Free to customers from January to April. Fee to customers starting on May 1, 2013.

Exhibit D

Exhibit D

Mobile/Wireless Use¹

- Rise in mobile technology has changed how people access the internet.
- 50 percent of households with incomes less than \$30,000 per year go online wirelessly.
 - 88 percent of adults have a cell phone.
 - 57 percent have a laptop.
 - 19 percent own an e-book reader.
 - 19 percent have a tablet computer.
- 63 percent of adults access the Internet wirelessly using a mobile device.
- 46 percent of adults have a smartphone, while 41 percent own a cell phone that is not a smartphone.
 - Among smartphone owners, low-income households, minorities, young adults, and those with no college education are more likely to say that their phone is their main access to the Internet.
 - Smartphone ownership for adults with a household income of less than \$30,000 increase from 22 percent in 2011 to 34 percent in 2012.
 - 40 percent of smartphone owners with a household income of less than \$30,000 per year mostly use their cell phone for Internet access.

Internet Use²

- Internet use for adults with a household income of less than \$30,000 per year increased from 28 percent in June 2000 to 62 percent in August 2011.
- 42 percent of internet users in households with incomes less than \$30,000 per year bank online
- 21 percent of adults do not use the internet for the following reasons:
 - 48 percent = Relevance (not interested, waste of time, too busy, don't need/want)
 - 21 percent = Price (too expensive, don't have computer)
 - 18 percent = Usability
 - 6 percent = Availability
- In an additional survey conducted by the Pew Research Center in May 2010, 79 percent of adults were accessing the Internet. Of that group, 58 percent reported banking online. For adults not accessing the Internet, six percent attributed the main reason for not using the internet as not having access.³

¹ Pew Research Center, Digital Differences, April 2012.

² Pew Research Center, Digital Differences.

³ Pew Research Center, Generations 2010.

Internet Use at Public Libraries

Public Use Internet personal computers per Capita increased in Washington by approximately 15 percent from 2009 to 2010.⁴

State Ranking⁵

- Average number of public-use internet computers of public libraries per stationary outlet in Washington for Fiscal Year 2010 was 16.63 (ranked 16 out of 50).
 - Idaho = 10.47 (ranked 36).
 - Oregon = 12.93 (ranked 29).

- Average number of public-use internet computers of public libraries per 5,000 population in Washington for Fiscal Year 2010 was 4.20 (ranked 32 out of 50).
 - Idaho = 5.32 (ranked 14).
 - Oregon = 3.80 (ranked 38).

Library Services and other Community Internet Access⁶

- 73 percent of Americans 16 and older know there are free places in their community to access the internet or use a computer free of charge.
 - 35 percent of those individuals state they have used those free access points.
 - 32 percent with household incomes less than \$30,000 per year.
 - 37 percent with household incomes \$30,000 - \$49,000 per year.
 - 41 percent aged 18-29.
 - 42 percent aged 30-49.
 - 29 percent aged 50-64.
 - 20 percent 65 and over.

- 26 percent of Americans 16 and older used computers or WIFI connections at libraries to go online.
 - 16 percent of these individuals paid bills or did online banking.

⁴ Institute of Museum and Library Services, Public Library Survey, FY2010.

⁵ Institute of Museum and Library Services, Tables, FY2010.

⁶ Pew Research Center, Library Services in the digital age.

Exhibit E

Exhibit E
NACM-IUG Survey

Do you knock before disconnection? If so, do you wait for customers to make payment over phone.

In Florida, we just cut the service – our field staff does not discuss the delinquency and they have multiple orders to complete, therefore, they do not wait for the customer to make terms.

At Louisville Gas & Electric Co and Kentucky Utilities Co, our field service techs **do not** attempt to contact residential customers, prior to disconnect. If the customer makes contact, the techs will occasionally allow the customer to pay (they can do so by phone or internet), but not generally make arrangements. Our thought is that if we've sent an employee/truck to disconnect, only payment in full should stop it. On certain non-residential accounts, we will sometimes engage the customer prior to disconnect, especially if gas service or a CT-type meter is present.

We rarely collect in the field if that counts. If the customer comes to us we will talk and potentially wait for them to call in or, if we have other activities close by or going to lunch we might give them an hour and come back. If they are successful with payment or arrangements the office waves off the field staff.

At NV Energy, we have not accepted payments in the field for over 10 years. In August 2011 we instituted remote disconnects and reconnects in Las Vegas, and just this month we started it in Reno, so there is no contact in the field. Prior to remote disconnects and reconnects, we were required to leave a door hanger, but not required to make contact with the customer.

Previous to remotes, if the field person was stopped by the customer we would not stop the disconnection of service to allow for the customer to make a payment. The customer was advised once the payment was made, the service would be restored.

Please let me know if you have any other questions.

- **Does the collector knock on the door before disconnecting? YES**
- **If they do, will they wait while the customer makes a payment or arrangements over the phone? NO, makes payment to collector or disconnect**

- **Does the collector knock on the door before disconnecting?**
- **Yes, required by regs; do not have to wait for an answer though; just the attempt to notify customer of turn off**
- **If they do, will they wait while the customer makes a payment or arrangements over the phone?**
- **No Way!**

Yes- the collector does attempt to make contact by knocking on the door prior disconnecting service, they advise the customer the service will be disconnected that way if the customer has any important data they are working on via computer, they have time to save and turn off prior to the disconnect taking place.

No- the collector will not allow the customer time to make payment, we simply advise the customer that we have an order to work and we must complete the order- but the customer is urged to contact customer service call center for details on account and how to get the service reconnected

Exhibit E
NACM-IUG Survey

Do you knock before disconnection? If so, do you wait for customers to make payment over phone.

<p>Ameren IL is required to knock at the door prior to disconnection per our Admin Code. The field workers are trained to just disconnect the service after they knock and ask the customer to call into the call center. They are instructed not to provide the amount that needs to be paid either. With that being said, some field workers will give the customers a chance to call and make a payment before they disconnect the service(the field tells the customer they will give them a hour or two and will be back then to disconnect) although that is not the procedure. If you have any questions, just let me know.</p>
<p>In Burbank, we have never knocked on the door first...and now, most of our meters are remote disconnect/reconnect anyway.</p>
<p>Does the collector knock on the door before disconnecting? YES If they do, will they wait while the customer makes a payment or arrangements over the phone? Case by case basis</p>
<p>Being a gas utility, we will still be collecting at the time of disconnects and knocking on the door. Our collectors currently make payment arrangements on the spot about 3-4% of the time. We ask them not to wait for the customer to call to make a credit/debit card payment over the phone as the customer had enough time to pay and there are no negotiations taking place with the customer, although they will accept about 80% of the bill.</p>
<p>Duke Energy does knock on the door; we are mandated to do so. If the customer is willing to make a payment (not arrangements) over the phone, we wait and get the confirmation number of the payment from the customer.</p>
<ul style="list-style-type: none"> • Does the collector knock on the door before disconnecting? Our collectors do not knock on the door when leaving the notice. • If they do, will they wait while the customer makes a payment or arrangements over the phone? If they come into contact with the customer they will not wait for them to contact the Call Center. They are simply advised to make arrangements or payment in 24 hours to avoid an interruption in service.
<p>Does the collector knock on the door before disconnecting? YES If they do, will they wait while the customer makes a payment or arrangements over the phone YES</p>
<ul style="list-style-type: none"> • Does the collector knock on the door before disconnecting? Response: Yes, it is a courteous knock only • If they do, will they wait while the customer makes a payment or arrangements over the phone? Response: No, unless it is an unusual situation
<ul style="list-style-type: none"> • We do not knock on a customer's door prior to DC. We have already made multiple outbound calls and mailings to them at this point, making them aware of the date they are pending DC, provided they don't make a payment/arrangements. This change was made years ago for safety reasons primarily. • It is rare that a customer will stop the service worker and ask them to wait while they make a payment. In the event they do, the service worker instructs the customer to call 1-800-Alliant, make their payment and the RC order will be generated. We do not guarantee same day RC.

Exhibit E
NACM-IUG Survey

Do you knock before disconnection? If so, do you wait for customers to make payment over phone.

Our reps generally do not knock and most areas will not wait for the customer to call the center. Once the truck rolls, we are performing the shutoff.

- **Does the collector knock on the door before disconnecting? no**
- **If they do, will they wait while the customer makes a payment or arrangements over the phone? Sometimes a customer will see them arrive and there are a few arrangements made at that time – this is not a common practice.**

The Los Angeles Department of Water and Power currently collects in the field, but like you, we are looking to cease this practice. We do not have a date to begin this practice, but we are discussing simply disconnecting the service without a knock (the customer has had plenty of notice). And not waiting for any type of negotiation to take place over the phone or in person.

At Public Service Company of Oklahoma we do not knock on the door, most Specialists hang the notice on the door then cut. Disconnecting the meter then hanging the notice increases the chances of a customer confrontation. Once the meter has been disconnected there is no reconnect unless payment has been made or the customer can show a valid receipt of payment that may not have posted to the account for whatever reason.

Today, we do collect customer payments in the field. However, we are also transitioning to a “no field collection” policy – effective April 1, 2013. At that time...

- the collector will not knock on the door before disconnecting; they will hang a door tag informing the customer of the disconnect and then proceed to the meter
- if the collector is approached before the disconnect, he/she will not wait for the customer to make a payment or arrangements over the phone.

Once we are at the premise, the service needs to be disconnected.

We're currently in the process of completing our communications plan. I've copied our Field team on this as they may want to reach out to you after October 1 to see how things are going.

- At PSO, we are not required by the commission to knock and make contact before disconnecting for nonpayment... therefore, we do not. We leave the card on the door and then proceed with the disconnect.
 - At PSO, once the disconnect order goes to the field, the customer is no longer eligible for a pay arrangement. The phone center sees an indicator on their screen "Out With Collector" so they know not to negotiate but instead request payment in full before having the service reconnected.

No, we do not. We stopped that process years ago.

Exhibit E
NACM-IUG Survey

Do you knock before disconnection? If so, do you wait for customers to make payment over phone.

Laclede Gas Company, St. Louis Missouri

We have a regulatory requirement where field collectors are required to make an attempt to contact the customer at the service address prior to disconnection due to non-payment. If contact is made with the customer or responsible adult party and a paid receipt is provided which meets the minimum payment requirement, the disconnect order is canceled. Collectors do not accept payment in the field nor do they wait for payment to be made over the phone.

At PSNC, we have not collected in the field since 2005. As for knocking on the door, our Commission approved that we can go straight to the meter, if we've been to the premise within the prior 12 months for collections purposes. If not, we knock on the door and will accept payment arrangements at that time.

You know my answer but I am curious to know what the other responses are that you receive.
We knock and collect over phone but do not take payments.

Our tariff states that we must knock on the door before turning off service. If you are fortunate to not have that in your rule I would continue with the plan to hang the tag and leave. Our guys in the field cannot take payments but what happens is they get to the door and the customer wants to negotiate or call the center and he is stuck waiting around for the payment. I suppose this does prevent a second truck roll – however no hurt to the customer so will they do this again next month. Then you didn't prevent the truck roll. In addition, customer receive receipt numbers when they make payments, there has been several occasions where the customer gives the information to the field guy and they leave thinking they paid when they have not.

The down side in my opinion to not knocking is that if you knock and you find an elderly person or a handicapped person that needs assistance, you see that. Our guys are trained to contact Customer Relations and we can get them the help they need. This you would miss.

We do knock before disconnection in all of our 8 states we serve. Some are required through regulation, so we make it standard across all states. In those states where we do not accept cash, we will wait until customer calls in payment (confirmation number provided to service tech) or makes arrangement with Customer Service.

We do not knock unless the account is coded that the customer has medical equipment (our Medical Care Program).

No, we will not wait while they try to make arrangements on the phone. Our goal is to leave the door hanger and move on. If we come into contact with the customer and they have questions, they are advised that the call center phone # is on the door hanger. They politely explain that they do not have access to any of the information.

We stopped knocking on doors in 1997 and discontinued collecting any payments last year.

Exhibit E
NACM-IUG Survey

Do you knock before disconnection? If so, do you wait for customers to make payment over phone.

For Mississippi Power:

We stopped collecting money in the field and stopped hanging door tags July1, 2012.

We do not knock on the door. We go straight to the meter.

We do not wait for the customer to make payment arrangements. We tell them that if they go to the office and make the necessary payments, we will come back out for the re-connect.

Thus far, there have been no negative issues since this change. The only response we saw through the month of July were customer lines in our larger offices making payments because they were cut-non-pay. We anticipated this and continue to anticipate that by September customers will become educated in this new process and customer traffic will return to normalcy – and, hopefully a reduction in CNP field orders.

I trust this is helpful information. Please let me know if I can provide any further information.

Regarding question #1: no - customer was already sent a 10 day disconnection notice through the mail letting them know how to avoid disconnection.

Regarding question #2: typically not

Peoples Gas and North Shore Gas

- **Does the collector knock on the door before disconnecting? In Illinois it is required by the Administrative Code but it is also accepted by the commission and utilities that it is too dangerous so it has become accepted practice to not engage the customers by all parties until new rules are approved.**
- **If they do, will they wait while the customer makes a payment or arrangements over the phone? No. We will not allow a field tech suspend a disconnection while at the customers premises.**

Michigan Gas and Minnesota Energy

At MGU we are required to make contact with the person. MGU will accept payments in the field to avoid disconnections. They also charge a fee for this service which does not cover the truck roll.

MERC does not collect money in the field.

Wisconsin Public Service and Upper Peninsula Power

- **Does the collector knock on the door before disconnecting? No we do not make customer contact for residential disconnections and most small commercial disconnections (single phase electric). For larger commercial we do make contact if there is high electric load on meter.**
- **If they do, will they wait while the customer makes a payment or arrangements over the phone? If the customer sees our disconnection employee or comes out to make contact after disconnection, we do not allow the customer time to make payment or arrangements. If the customer claims to have already made the payment and has an invoice number, our field person will call in to confirm if payment was made (this is done because we do not have mobile system with real time payment interface). If that payment was not made, they will proceed with disconnection.**

Exhibit E
NACM-IUG Survey

Do you knock before disconnection? If so, do you wait for customers to make payment over phone.

If the customer does happen to come outside, we do have some employees that will give the customer an hour or so to post a payment.

*** If the customer did not receive a courtesy disconnect card the previous day, do not owe a large sum of money, and are no more than 30 days in arrears.

The employee explains that they will be in the area for another 30 min to an hour and that if the payment does not post they will return. Most of them make the payment, the order falls off the mobile data computer, and the reconnect trip is avoided.

They do nothing to initiate customer contact.... the field reps refer to it as "Cut and Run

- **Does the collector knock on the door before disconnecting?**

Our collectors do not knock on the door before disconnection of service for either residential or commercial. The collector goes "straight to the meter" to disconnect. We stopped collecting in the field 5+ years ago, mainly due to safety concerns of the collector but also to improve productivity. We do, however, leave a door hanger on the door after disconnection (PSC rule we must follow) but we do not knock.

- **If they do, will they wait while the customer makes a payment or arrangements over the phone?**

No, we do not. See the answer above.

At Hydro-Québec, we do not collect payments in the field.

We do not Knock on the door before disconnecting.

After disconnecting, we leave a note engaging the customer to call us as soon as possible to take arrangements with us.

Eugene Water & Electric Board does not take payment in the field in any form (not since 2001) on a non-pay disconnect. Field staff does not knock on doors or attempt to engage a customer prior to disconnection. If customer approaches field staff, the field staff makes the determination if they're willing to wait or return to allow a customer time to call in a charge-card payment (depends on the field work load and the onsite situation), but any delay in disconnection is the field staff's decision. Hope that's helpful.

Per our Public Service Commission's (Maryland and District of Columbia), we are required to knock at the door prior to disconnecting service.

ENSTAR Natural Gas Company in Alaska, we do collect checks in the field or give them a number to call to make a payment over the phone or on line. They will wait a few minutes for them write a check (max 15 if schedule allows). If the customer is going to pay on the phone or on line they do not wait...they cancel the order. Credit then checks the account the following day to see if the payment was made...if not another order is issued to the field.

They do not wait for the customer to call and make arrangements or question a bill...they are there to collect or lock.

We are required to make attempt to contact when there to lock.

We do not accept cash in the field.

- We do not knock on the door before disconnecting

Exhibit E
NACM-IUG Survey

Do you knock before disconnection? If so, do you wait for customers to make payment over phone.

We do not knock on the door prior to disconnecting. We go directly to the meter; we do not wait for arrangements. We tell the customer the call center will contact them once arrangements are made.

- **Does the collector knock on the door before disconnecting?**
Yes, we knock on every collections account, the only time we do not knock is when the account has become UKU (unknown user) since there is no customer on record we simply go to the meter
- **If they do, will they wait while the customer makes a payment or arrangements over the phone?**
They wait a few minutes (1-3 min) to try and obtain payment. At that time the account is locked and the only way the customer can avoid a disconnection is to pay the collector, all channels have been shut down. The only exception is an authorized pay agent. Collectors, at their discretion can leave a notice and not disconnect the service.

TEP discontinued picking up payments in the field in 2000.
There was a 40% increase in call volume but eventually it subsided.
We told customers in our payment lobbies for 4 months, we hung door tags, etc.
When TEP disconnects a customer for nonpayment, the field personnel completes their task and leaves a door tag.
They DO NOT knock before cutting.
However, if a customer leaves a payment attached to their meter, we LEAVE the payment and give them a 24 hour notice.
I suggest the cut and run concept.

We do knock before disconnecting....
Some collectors will wait while the cust makes a payment over the phone, but some don't. They aren't required to give more than a minute or two to get a payment to them.

In the City of Regina field service staff does not knock on the door either when delivering the door knocker or when disconnecting the water. The field service staff has laptops in their vehicles and they enter the time the door knocker is left and the time/reading of the meter when water is disconnected. We find this information very useful in that we can tell the customer exactly when the door knocker was delivered and when customer calls we know if the water is currently off or on.

Our current process is that we deliver the door knocker giving the customer 24 hours to pay and then we give them the day after delivery of the notice for their 24 hours. The only difference is if the customer has had a disconnect and made a payment arrangement to avoid the disconnect. Those accounts are disconnected without notice.

Our field staff are often approached by customers when they are disconnecting the water. Customers are asking for more time or are just on their way to pay, etc. We leave the decision up to the field service staff as to whether they want to give the customer time or whether they will still disconnect. Since most customers are repeat offenders they have a good idea as to whether the customer will actually follow through or not. If the field service staff do allow the customer time, it is then the responsibility of the field service staff to follow up on whether customer has done what they promised.

If customers claim they paid and they have their receipt the field service staff can check their receipt carefully and notify us of what they have been shown. Our field service staff have never collected payments in the field.

Exhibit E
NACM-IUG Survey

Do you knock before disconnection? If so, do you wait for customers to make payment over phone.

We do attempt to make contact by knocking on the door to advise we are about to disconnect. We do not wait for customers to make payment; however we may pass it and go back if payment is not made prior to the tech coming in. Also as a courtesy customers are notified via phone the day before.





Hi Larry – we have technicians that go out to disconnect on instructions from the collectors. Technicians do not knock at the door or take payments or arrangements. Our collectors are to have exhausted all avenues prior to sending for disconnection.

- **Does the collector knock on the door before disconnecting? Yes; as a courtesy to let the customer know we are there and why.**
- **If they do, will they wait while the customer makes a payment or arrangements over the phone? The techs have the discretion to wait and allow the customer to make a payment/arrangements but the policy is if they are there to shut the customer off, that's what they are going to do.**

Exhibit F

PACIFICORP COMMUNICATION OF FIELD COLLECTION POLICY CHANGE IN UTAH

Utah Card – Side 1 English, Side 2 Spanish:

<p>To our valued customers:</p> <p>As of October 1, 2012 we are no longer able to collect customer payments when our employees come to your home or business. We have several payment options available once your account is past due:</p> <ul style="list-style-type: none">• Pay online• Pay by phone (fees apply) <p>If you need further arrangements or other payment options, please call our toll-free customer service number 1-888-221-7070.</p> <p>This change was made for employee safety and security of customer payments. It also helps reduce costs for all our customers.</p> <p>We appreciate your patience and understanding. It's a pleasure to serve you.</p> <p> ROCKY MOUNTAIN POWER Let's turn the answers on.</p> <p></p> <p><small>© 2012 Rocky Mountain Power</small></p>	<p>A nuestros apreciados clientes:</p> <p>A partir del 1 de octubre de 2012, nuestros empleados ya no podrán aceptar los pagos directamente de los clientes nuestros cuando van a su casa o negocio. Tenemos varias opciones de pago disponibles una vez que se ha vencido el plazo de pago:</p> <ul style="list-style-type: none">• Pago en línea por Internet• Pago por teléfono (se aplican cargos) <p>Para realizar otros arreglos o para otras opciones de pago, por favor llame a nuestro número gratuito de servicio al cliente al 1-888-225-2611.</p> <p>Este cambio es por razones de seguridad para nuestros empleados y para la seguridad de los pagos de nuestros clientes. También ayuda a reducir los costos para todos nuestros clientes.</p> <p>Apreciamos su paciencia y comprensión. Es un placer servirle.</p> <p> ROCKY MOUNTAIN POWER Hagamos brillar las soluciones.</p> <p></p> <p><small>© 2012 Rocky Mountain Power</small></p>
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