

February 18, 2014

***VIA ELECTRONIC FILING***

***AND OVERNIGHT DELIVERY***

Steven V. King

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. UE-001734—Report on Costs Associated with Permanent Disconnection and Removal of Facilities**

Dear Mr. King:

Please find enclosed Pacific Power & Light Company’s (Pacific Power or Company) report on costs associated with permanent disconnection and removal of facilities for the period of January 1, 2013, through December 31, 2013. The enclosed report details the cost of removing facilities when a customer requests permanent disconnection of service and the Company’s service facilities are not likely to be re-used at that location and require removal for safety or operational reasons.

The enclosed report has been filed annually since the conclusion of Docket No. UE-001734. However, based on the discussions with parties as a result of Order 04 in Docket No. UE-130043,[[1]](#footnote-1) the 2013 report presents a more comprehensive summary of the cost associated with the removal requests than previously filed reports.

The majority of the requests to permanently disconnect service are made so that customers can switch electric utility providers. While the Company has service area agreements with surrounding utilities, it has been unable to negotiate an agreement with Columbia Rural Electric Association (Columbia REA). This has resulted in duplicative services within several of the communities the Company has historically served. To ensure the Commission is aware of the full impact permanent disconnection of facilities have on the Company, the Company also submits the following list of safety and operational concerns that have been identified related to duplicative service.

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| **Issue** | **Event** |
| Delayed utility response to emergency situations. Responders need to know which utility to call. | * Approximately five years ago, the Company was contacted regarding a substation fire. The Company responded and found it was a Columbia REA substation. The Company contacted Columbia REA to report the fire and have them respond.
* Within the last year, the Company also responded to a report of a primary line too close to the ground. Upon arrival, the Company determined the primary line belonged to Columbia REA. The Company contacted Columbia REA to advise them of the issue.
* In January 2014, emergency services contacted the Company requesting disconnection due to a house fire. When the Company arrived, it was determined that Columbia REA served the home. Since emergency services needed the service disconnected immediately, the Company disconnected the service rather than have the disconnection delayed until Columbia REA arrived on site.
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| Connecting service before the other utility disconnects. | * The Company requested Columbia REA and the customer’s electrician not connect service until the Company has permanently disconnected its facilities.  There have been several incidents where the Company arrived to remove its facilities and Columbia REA was already serving the customer. In one particular instance, the Company found its meter was spinning backwards, indicating there was a power feed from the building into the Company’s system.  The Company believes that hooking the two systems to a common ground caused a power flow between the two power providers.
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| Installing buried lines directly under the Company’s overhead facilities could lead an excavator or Company employees to think that the lines are only overhead.  | * Both utilities have arrived to requested excavation locates and painted “No CREA” or “No PP+L” directly on top of the other power provider’s high voltage cables.
* The Company has also seen examples where the utility locate identifies only one electric utility’s facilities when two electric utilities are present.
* In May 2013, the Company responded to a car hit pole in the middle of night and requested emergency locates to change the pole out.  After waiting two hours for Columbia REA to locate electric facilities, the Company proceeded with the pole replacement without locates in order to restore service to customers. Columbia REA showed up later and located buried high voltage lines nearby.
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| **Issue** | **Event** |
| Multiple electric providers on the same structure. | * In 2012, the Company received a request from a customer requesting to permanently disconnect service so that they could switch utility providers. Having one building with multiple services creates an unsafe environment for firefighters or electricians who may be unaware the building has a second source of electricity. The Company will not permanently disconnect a service to a structure with multiple services unless all of the services to the structure are permanently disconnected.
* In November 2013, a residence was found taking electrical service from CREA while still hooked up to the Company’s energized facilities.
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| Violation of clearance standards  | * In July 2013, Columbia REA’s contractor planned to bury a new high voltage line 12” from one of the Company’s 7,200 volt lines.  The Company contacted Columbia REA and requested the line be located at least 6 feet from the Company’s facilities, which is Pacific Power’s construction standard. Columbia REA was reluctant to move their facilities, but cleared the violation after local authorities and Labor and Industries became involved.
* In 2013, Columbia REA was required to lower a distribution line under the Walla Walla-to-Wallula 230kv line because required clearances were not met. The Company is currently working to address another clearance issue involving Columbia REA’s distribution line under the Company’s Walla Walla-to-Hurricane 230kv line.
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| Damage to Company Property | * In October 2013, the Company received a report that a Columbia REA contractor trenching and installing conduits along the front of the Company’s Bowman Substation struck the substation fence, bending a post. The contractor attempted to straighten the post with a chain attached to a backhoe. When that effort failed, a worker was reportedly lowered over the fence with a backhoe into the substation to attempt further repairs to the damaged post.
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If you have any questions or require further information, please contact Jennifer Angell, Customer and Regulatory Liaison, at (503) 331-4414.

Sincerely,

R. Bryce Dalley

Vice President, Regulation

Enclosure

1. In compliance with Order 04 in Docket No. UE-130043, the Company met with interested parties on September 27, 2013, to identify specific data that should be included in the Company’s November 2013 report of permanent disconnection and removal of facilities process. The report was docketed as UE-132182. [↑](#footnote-ref-1)