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Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, Washington 98503

RE: Docket U-210590—PacifiCorp’s Comments and Proposed Metrics

At the workshop held on May 28, 2024, the Washington Utilities and Transportation Commission (Commission) requested that parties submit any further comments on the metrics and questions discussed at the workshop by June 4, 2024. PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) provides these brief comments.

Time to Enroll in Arrearage Management Plans (AMPs)

At the workshop and in its comments, The Energy Project (TEP) requested that the Commission track the number of days it takes utilities to enroll customers in an AMP. While TEP’s comments are unclear on the starting point of this metric, PacifiCorp presumes that the intent is to track the number of days between when a customer requests to be enrolled and when the customer is enrolled in the utility’s system.

While PacifiCorp does not yet have an AMP, the Company committed to develop a low income AMP in its last general rate case. It would be difficult, therefore, for PacifiCorp to provide a timeline, but it would be helpful to better understand the purpose of such a metric. While it may take time to go through the mechanics of setting a customer up in the system, with varying lengths of time depending on the design of the program, the time it takes would be negligible. If there is a perceived impact to customers due to the time taken to enroll, it would be helpful to understand what those concerns are so a more effective safeguard can be put in place.

Calculating Energy Burden for Dual-Fuel Customers

PacifiCorp is an electric-only utility, and does not have data regarding our customers’ other providers. At the workshop, there was some discussion regarding requiring utilities to share data with other utilities to enable a more holistic view of customers’ energy burden; PacifiCorp has significant concerns with this suggestion.

PacifiCorp takes safeguarding personal customer information very seriously, and urges the Commission to consider the complications of such a requirement. The Company would not be comfortable sharing the level of personal customer data that would be necessary to calculate a more granular level of energy burden.

