

the
Energy
Project

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a project of:



Community Action

A Community Action Agency
serving Whatcom, Island and
San Juan Counties since 1965

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In RE: Petition of PacifiCorp d/b/a Pacific
Power & Light Company for a Declaratory
Order Regarding the Interpretation of
WAC 480-100-128(6) and WAC 480-100-
178

DOCKET UE-132119

**THE ENERGY PROJECT'S
RESPONSE TO PACIFICORP'S
PETITION FOR DECLARATORY
ORDER**

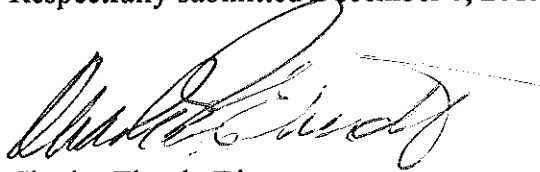
The Energy Project submits the following comments in regard to the question whether PacifiCorp's current practice of using a combined past due/disconnection notice complies with the Commission's rules. To dispense with repeating arguments made by other parties, we will note that we believe the Public Counsel's response succinctly and correctly covers the issue. That is, it appears the current practice does not meet the requirement for a separate and distinct disconnect notice, and, in fact, may be more a source of confusion than clearly communicating the customer's specific responsibilities.

It is the lack of clear communication that most concerns us. Prior to any explanation that the rules require a disconnect notice that is separate and distinct from a billing statement, the Energy Project contacted personnel from the three agencies that handle LIHEAP and the utility's Low-Income Bill Assistance Program. The feedback we received from these individuals was divided. One opinion was that a separate notice was essential to get the attention of the customer. Another believed that some customers are confused when they get a disconnect notice with one amount on it, then another bill with a different amount on it; they aren't sure which they have to pay, or by what date. These comments do not address what the legal requirement is, but simply highlight the confusion that results when the messaging is not clear.

Given that PacifiCorp is not issuing a separate and distinct disconnection notice, the agency reports that customers are confused by what they receive indicates that the current process is not sufficiently clear. Whether or not a separate notice is issued, it is imperative that PacifiCorp's communication clearly delineate what must be paid to avoid disconnection distinctly from the current charges that are not past due or cause for disconnection and that the separate payment dates for each of these be clearly identified. Public Counsel's response describes how confusing a past due date and a disconnect date could lead a household to pay hundreds of dollars before they are due. Low-income households in particular need the full time period allowed to pay their bills; they must not be misled to pay hundreds of dollars earlier than necessary. This further reduces what little financial flexibility they have, and can result in the loss of other services or necessities.

PacifiCorp is requesting that its practice of using a billing notice as a disconnect notice be deemed to comply with the requirements of WAC 480-100-128(6)(a). The Energy Project believes the current practice is the source of unnecessary confusion. Simply issuing a separate disconnect notice may not adequately clear up the confusion, however. The Company should be required to reformulate their messaging on disconnect notices, past due statements, and regular billing notices so that the customer know exactly how much of their bill is due by what date, and to clearly identify the actions that will result if those payments are not met.

Respectfully submitted December 6, 2013

A handwritten signature in black ink, appearing to read 'Charles Eberdt', with a horizontal line extending to the right from the end of the signature.

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