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Mark L. Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

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COMMISSION

RE: Docket U-180525—Pacific Power & Light Company’s Comments in Response to December 19, 2019 Workshop

PacifiCorp dba Pacific Power and Light Company (PacifiCorp) submits these responses as directed at the conclusion of the December 19, 2019 public workshop on Advanced Metering Infrastructure (AMI) rules.

PacifiCorp’s responses are as follows:

Item 1 – Please provide short-term and long-term medical forms.

PacifiCorp addresses short-term and long-term medical conditions through the use of its Medical or Life Support Equipment Certificate form, included with this filing as Attachment A. This certificate, after being completed and received, provides qualifying customers with additional protections from shutoff due to nonpayment of bills. The company supports the current language in the draft rules, which provide additional disconnection protections for a customer with an active medical condition.

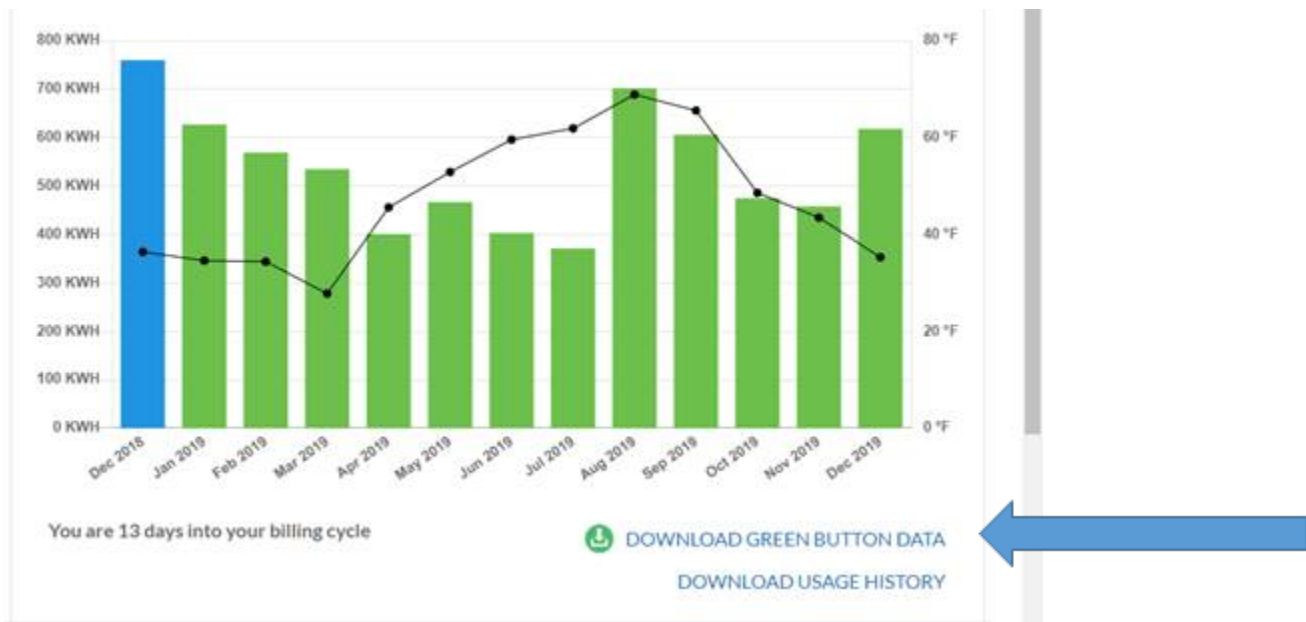
Previous versions of the draft rules would have provided these additional protections to a customer that has a “medical emergency” within the prior two years; however, it is not clear what a “medical emergency” would be defined as or how the utilities would be able to track this information. A medical certificate, completed and signed by a medical professional, provides the utility with information on the type of medical needs the customer has to help make a better determination for the duration of the certificate. By requiring a medical certificate, the draft rules will provide greater certainty to both utilities and customers. Further, the company’s form is a simple one page form that is not unduly burdensome or complicated. For non-life support medical needs, the company provides the additional protections for a period of sixty (60) days and for life-support medical needs, the company provides the additional protections for a period of twelve (12) months. At the end of these time periods, the customer can apply for continued protection by submitting a new medical certificate form.

Item 2 – Please confirm whether PacifiCorp can support a 10 business day turnaround to respond to customer requests for information.

PacifiCorp can support a 10 business day turnaround to respond to most customer requests for information. However, in the case of an especially voluminous or complex case, there should be a process by which a utility may work with a customer to extend the timeline. PacifiCorp respectfully requests that some flexibility be included in the rule to allow for such necessary extensions of time.

Item 3 – Please verify whether PacifiCorp assesses a fee to customers who request copies of their data.

PacifiCorp currently does not assess a fee to customers who request a copy of their data. All PacifiCorp customers, regardless of the type of meter installation, may access usage data information on the company’s website using the “Green Button” feature.



Item 4 – Overview of current data and physical security processes

PACIFICORP SECURITY ORGANIZATION

The cybersecurity and physical security functions at PacifiCorp are centralized under its internal Corporate Security and Risk organization. PacifiCorp’s philosophy is to ensure prudent application of appropriate risk management techniques to minimize the likelihood or impact of risks that could significantly affect the company’s personnel, property, or ability to perform critical operations that serve customers and stakeholders.

The company's security program focuses on development and implementation of strategic global security policies and practices. The organization is responsible for enterprise-wide security monitoring and alerting, including event analysis and incident response. The program promotes consistency in the application of policies and practices; provides forums to discuss security incidents, issues, threats and emerging trends; facilitates an annual review of security policies and standards; and ensures development of standards, procedures, controls, and guidelines that support a stable and secure operating environment.

VOLUNTARY AND MANDATORY STANDARDS

PacifiCorp leverages a wide variety of voluntary standards to aid in the design and application of good security practices; example sources include U.S. Department of Homeland Security, U.S. Department of Energy, ASIS International,¹ International Organization for Standardization (ISO), National Institute of Standards and Technology's (NIST) Standard Reference Materials and Cybersecurity Framework, and Electricity Subsector Cybersecurity Capability Maturity Model (ES-C2M2). The company also complies with mandatory standards, including North American Electric Reliability Corporation (NERC) Reliability Standards and Critical Infrastructure Protection Standards (CIPS).

INFORMATION SHARING AND COLLABORATION

Although traditional protective security controls are important, they are not sufficient to protect against all vulnerabilities and emerging threats. PacifiCorp engages with many information sharing and threat awareness sources to aid in measuring the effectiveness of its security controls and to collaborate with industry peers and national, state, and local agencies to address common security issues.

PacifiCorp places significant emphasis on adaptive security measures related to identification of new and emerging threats. The Corporate Security and Risk Organization actively monitors physical and cybersecurity alerts and advisories from a variety of sources, including U.S. Department of Homeland Security US-CERT, ICS-CERT and Homeland Security Information Network (HSIN), Electricity Sector Information Sharing and Analysis Center (ES-ISAC), state fusion centers, industry groups, peer organizations, local and regional agency contacts, and security vendor resources. The information gleaned from these sources aids in the company's awareness, evaluation, and application of mitigation measures.

ASSESSMENTS AND TESTING

PacifiCorp supports a variety of strategies to assess its security posture. In cooperation with its internal audit organization, third-party vulnerability assessments and penetration tests are conducted every other year. Different third parties are used to provide variation in the processes, tools, and skills that are applied to assess the company's security. The final assessment reports are submitted to the executive team and key stakeholders. The company also participates in

¹ ASIS International is a global community of security practitioners.

federal, state and industry assessment programs, ensures assessments required to comply with regulatory and other standards are completed (*e.g.*, NERC CIPS and EOP), and conducts additional internal assessments to evaluate its security measures and controls.

INCIDENT RESPONSE AND EXERCISES

PacifiCorp has a strong culture of incident response and management practices. Incident response, cybersecurity incident response, business continuity and technology recovery plans are in place and exercised annually, at a minimum. Depending on the scope and severity of an incident, an escalating set of incident command teams can be mobilized for response, including a company-level incident command team. The National Incident Management System (NIMS) is used as the foundation for incident command team structures and protocols. Cybersecurity, business continuity and technology recovery plans may be activated to support incident command team objectives. Third party agreements are in place to facilitate requests for assistance when additional resources, skill sets and assets may be needed to respond to or recover from an event.

A wide spectrum of tabletop and functional exercises are conducted to evaluate the strategies in PacifiCorp's plans. Local and regional law enforcement and response agencies are often invited to participate in the exercises, and the company periodically participates in exercises conducted by local, regional and national entities.

Comprehensive reviews are conducted after key exercises and incidents to identify and document lessons learned. The information is shared with response team members and organizational stakeholders and used to improve the company's plans and programs.

Summary of Additional Comments Provided at the Workshop

Pacific Power also provides the following comments and suggested changes to the revised draft rules below. These comments are consistent with the comments made by the company at the workshop and are provided to aid the Commission in developing the next iteration of the draft rules.

WAC 480-100-128, Disconnection of Service

WAC 480-100-128(1)

The company reiterates its concern that the current version of the draft rules (the October 30, 2019 version) removed the language from section 480-100-125(1) stating that "...the customer will be responsible for paying for service taken at that service address until the utility can confirm the date that the customer vacated the premises and the utility can access the meter, if necessary." The deleted language is in bold and would ensure that a utility could access to perform a final meter reading. As discussed at the workshop, there are instances where meter access is required even with AMI technology and therefore this language should be maintained.

WAC 480-100-128(2)

The draft rules insert “the customer” at the beginning of each subsection of 480-100-125(2). The company proposes to remove this language because there may be instances where the utility is unable to determine whether it was *the customer* that directly engaged in the actions described. For example, subsection (f) allows disconnection where “equipment is being used in a manner that detrimentally affects the utility’s service to other customers.” A customer is the person responsible for a particular account with the utility; the definition of customer does not extend to all persons residing at a particular address who may otherwise use equipment that detrimentally affects service under subsection (f). Because the language of 480-100-125(2) already requires notice to the customer, it does not seem necessary to also require that the utility make a determination that the customer created the safety hazard that is present at the premises. Removing the additional “customer” modifier from these subsections removes a potential loophole and makes it easier for the utilities to disconnect service where there are safety concerns.

WAC 480-100-128(6)

This subsection requires a utility to visit the customer’s premises before remote disconnection if such customer has received low-income assistance within the last two (2) years. While the company understands the Commission’s and stakeholders’ concerns, this is a particularly burdensome requirement for PacifiCorp due to the demographics of its service area. PacifiCorp does not have AMI deployed in its Washington service area, but is concerned with the potential costs associated with these in-person visits. This requirement would create an additional barrier for PacifiCorp to adopt newer metering technology that would benefit all customers. Further, these customers receive ample notice in advance of the disconnection, including hard copy, electronic disconnection notices, and outbound phone calls. For these reasons, the company suggests removing the requirement for an in-person visit before remote disconnection.

Please direct any informal inquiries regarding this filing to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

 /s/
Etta Lockey
Vice President, Regulation
Pacific Power & Light Company
825 NE Multnomah St., Suite 2000
Portland, Oregon 97232
(503) 813-5701
etta.lockey@pacificorp.com