

UE-161204 / Pacific Power & Light Company
March 30, 2017
PC Data Request 20

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Refer to the Direct Testimony of R. Bryce Dalley, Exhibit No. RBD-1T at 8:6-8, which states:

One of the Company's concerns is that the customers who are offered special, competitive programs are typically customers with high enough margins to recover the costs of those special programs. These special programs are not offered to the low- or fixed-income population; but they, along with the rest of the Company's remaining customers, will be burdened to cover the fixed costs of infrastructure that the Company is required to maintain.

- a. Please explain how the Company knows that these special programs are not offered to the low- or fixed-income population.
- b. How many of the customers included in these populations are currently served by the Company?
- c. Is the reference to these populations meant to include only single-family residences?
- d. How many large multi-family residential complexes occupied by low- or fixed-income residents are currently served by the Company in Washington State?
- e. Please explain how the Company confirms that customers are offered special competitive programs and what the dollar value of those programs is.

Response to PC Data Request 20

- a. The Company has not received any permanent disconnection requests from customers who qualify for Pacific Power's low income bill assistance program.
- b. Pacific Power does not request information from its customers related to their income so does not know the number of low- or fixed-income customers it serves. Census data for Walla Walla County indicates 16.5% of the populace have incomes at or below the federal poverty level. The census data also reflects that the population totals 60,340 as of July 1, 2016. Accordingly, at that time, approximately 9,956 people in the county were living at or below the federal poverty level. A portion of limited income households (including households with higher incomes than the federal poverty level) obtain energy assistance from the federally-funded Low Income Home Energy Assistance

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by attorney-client privilege or other applicable privileges or law may have been included in response to these data requests. Accordingly, PacifiCorp reserves its right to seek the return of any privileged or protected materials that may have been inadvertently disclosed, and respectfully advise that any inadvertent disclosure should not be considered a waiver of any applicable privileges or rights. PacifiCorp respectfully requests that you inform PacifiCorp immediately if you become aware of any such materials in these responses.

Program (LIHEAP) and/or from other sources such as the Project HELP program. The Company partners with The Salvation Army in Yakima, Grandview and Walla Walla as well as the Northwest Community Action Center in Toppenish to provide energy assistance with funds contributed to Project HELP. In calendar year 2016, a total of 5,181 households in Pacific Power's Washington service area obtained energy assistance.

- c. No.
- d. Pacific Power is not able to determine the income of residents in multi-family residential complexes in our Washington service area.
- e. Please refer to the Company's response to Data Request WUTC 3 and information in the record in Docket UE-143932. Columbia REA has objected and refused to produce the service agreements entered with former customers of the Company.

PREPARER: Becky Eberle

SPONSOR: TBD