

October 9, 2014

Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW P.O. Box 47250 Olympia, WA 98504-7250

Attention:

Steven V. King

Executive Director and Secretary

RE:

UE-132119 - Petition for Declaratory Order Regarding Interpretation of WAC 480-100-128(6), WAC 480-100-178 and WAC 480-100-128(3); Report

on Compliance with Order 01

Dear Mr. King:

In accordance with ordering paragraph two, Order 01, Docket UE-132119, Pacific Power & Light Company, a division of PacifiCorp (Pacific Power or Company), Commission Staff, Public Counsel, and the Energy Project (Parties) met to discuss potential modifications to the Company's billing statements and initial disconnection notices. The Parties met on April 7 and May 19, 2014 and have identified reasonable modifications that will be made to the language and format of the Company's combined disconnection notice and monthly billing statement to address the concerns regarding customer confusion and compliance with WAC 480-100-128 and WAC 480-100-178. The Parties provide this report to keep the Commission apprised of the outcome of these discussions.

As a result of the discussions, Pacific Power will make the following modifications to its combined Past Due Notice and Billing Statement:

- 1. Pacific Power will modify the due date for the past due notice so that it is the same date as the due date for the current monthly charges. This change will be implemented to resolve the compliance concern raised by the Parties regarding the amount due and due date presented to customers in the upper right hand corner of the bill and on the remittance stub. The Company estimated a one-time cost of approximately \$3,000 to implement this modification. This modification has been completed.
- 2. Pacific Power will highlight the words "Past Due Amount" within the past due information text box by using bold font. This change will be implemented to draw more attention to the past due information. The Company estimated a one-time cost of approximately \$6,000 to implement this modification. This modification is scheduled to be completed by the end of January 2015.

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Washington Utilities and Transportation Commission
October 9, 2014
Page 2

3. Pacific Power will add yellow color behind the past due information text box. At the request of the Parties, the Company will implement this change to draw more attention to the past due information. The Company estimated a one-time cost of approximately \$150,000 with an estimated on-going annual cost of approximately \$25,000 to \$50,000 to implement this modification. This modification is scheduled to be completed by the end of January 2015.

For ease of reference, the Company is enclosing a copy of the current combined past due notice/billing statement as submitted in Docket UE-132119 along with a copy of the prototype with the changes referred in items 1 - 3 above.

During discussions Pacific Power advised the Parties it has begun preliminary discussions on replacement of its customer information system with the intention of replacing the system in or around the year 2020. Pacific Power has agreed to consult with the Washington Parties, as well as parties from its other jurisdictions, concerning the design and clarity of its combined billing and past due notice statement as part of its customer information system replacement project. This consultation will be timely and will allow stakeholders to provide material input to the Company.

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Barbara a Conghlini	
Barbara A. Coughlin Director, Customer & Regulatory Liaison	
Enclosure	
Utilities and Transportation Commission, Consume	rStaff Protection Section
Utilities and Transportation Commission, Consume By Assistant Director	Date 10/2-1/14
Public Counsel	
Ву	Date
Energy Project	
Ву	Date

Docket UE-132119 Washington Utilities and Transportation Commission October 9, 2014 Page 2

3. Pacific Power will add yellow color behind the past due information text box. At the request of the Parties, the Company will implement this change to draw more attention to the past due information. The Company estimated a one-time cost of approximately \$150,000 with an estimated on-going annual cost of approximately \$25,000 to \$50,000 to implement this modification. This modification is scheduled to be completed by the end of January 2015.

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Sincerely, Barbara a Coughlin	ia de la companya de
Barbara A. Coughlin Director, Customer & Regulatory Liaison	
Enclosure	
Utilities and Transportation Commission Consume	er Staff
Ву	Date
Public Counsel Section of the Washington By A. W. Gaft Lisa W. Gaften, Assistant Atto.	Date 10-13-2014
Energy Project	
Ву	Date

Docket UE-132119 Washington Utilities and Transportation Commission October 9, 2014 Page 2

Sincerely,

Barbara a Coughlin

3. Pacific Power will add yellow color behind the past due information text box. At the request of the Parties, the Company will implement this change to draw more attention to the past due information. The Company estimated a one-time cost of approximately \$150,000 with an estimated on-going annual cost of approximately \$25,000 to \$50,000 to implement this modification. This modification is scheduled to be completed by the end of January 2015.

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During discussions Pacific Power advised the Parties it has begun preliminary discussions on replacement of its customer information system with the intention of replacing the system in or around the year 2020. Pacific Power has agreed to consult with the Washington Parties, as well as parties from its other jurisdictions, concerning the design and clarity of its combined billing and past due notice statement as part of its customer information system replacement project. This consultation will be timely and will allow stakeholders to provide material input to the Company.

Barbara A. Coughlin	
Director, Customer & Regulatory Liaison	
Enclosure	
Utilities and Transportation Commission Consumer	Staff
Ву	Date
Public Counsel	
Ву	Date
Energy Project	
By Maileffffeedt	Date October 21, 2014

Copy of Combined Past Due Notice and Billing Statement Provided in Docket UE-132119



JOHN Q CUSTOMER 1234 MAIN ST YAKIMA WA 12345-0001 128(6)(a)(iv)

Questions about your bill: 1-888-221-7070 24 hours a day, 7 days a week www.pacificpower.net BILLING DATE:

Aug 12, 2013

ACCOUNT NUMBER:

12345678-001 0

DATE DUE:

Aug 23, 2013

AMOUNT DUE:

\$238.06

128(6)(a)

128(6)(a)(ii)

ACCOUNT PAST DUE

Our records indicate that your account is past due. If the past due amount has been paid, please remember that this bill also contains New Charges.

128(6)(a)(ii)

Historical Data - ITEM 3

Your Balance With Us

Previous Account Balance	94.72
Payments/Credits	0.00
Past Due Amount	94.72
New Charges	+143.34

Current Account Balance \$238.06

You Must Act Now to Avoid Shut-Off!

Your Electric Service Past Due Amount of \$94,72 must be received by Aug 23, 2013 to avoid shut-off.

Other ways to avoid Shut-off are shown at the end of this billing statement 128(6)(a)(i)

Remember: Your New Charges of \$143.34 are still due by Aug 28, 2013.

128(6)(a)(ii)

Your Average Daily kwh Usage by Month

PERIODINO	AUG 2613	AUE 2012
Avg Daily Temp	76	75
Total losh	1685	1370
Avg. his hiper Day	56	46
Cost per Day	84.75	\$3.73

To report an outage, downed line, or other power emergency, please call 1-877-508-5088

Payments Received

No payments have been received since your last billing statement

Detailed Account Activity

ITEM 1 -ELECTRIC SERVICE

1234 Main St Yakima WA Residential Schedule 16

METER	SERVICE PERIOR	D	ELAPSED	METER READ	NGS	METER	AMOUNT USED
NUMBER		To	DAYS	Previous	Current	MULTIPLIER	THIS MONTH
12345678	Jul 10, 2013	Aug 9, 2013	30	41712	43397	1.0	1,685 kwh

Next scheduled read date: 08-02. Date may vary due to scheduling or weather.

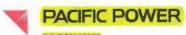
NEW CHARGES - 08/13	UNITS	COST PER UNIT	CHARGE
Basic Charge - Single Phase			6.00
Energy Charge Block 1	600 kwh	0.0623200	37.39

Write account number on check & mail to: Pacific Power, PO Box 26000, Portland, OR 97256-0001

RETAIN THIS PORTION FOR YOUR RECORDS

128(6)(a)(iii)

Late Payment Charge for Washington A late payment charge of 1% may be charged on the delinquent balance per month.



PO BOX 25308 SALT LAKE CITY UT 84125

128(6)(a)(iv)

ACCOUNT PAST DUE

128(6)(a)

WRITE ACCOUNT NUMBER ON CHECK & MAIL TO:

PACIFIC POWER PO BOX 26000 PORTLAND OR 97256-0001 Change of Address or Phone? Check here and provide information on back.

Account Number: 12345678-001 0

Date Due: Aug 23, 2013

AMOUNT DUE: \$238.06

Please enter the amount enclosed.

128(6)(a)(iv)

Questions about your bill: 1-888-221-7070

JOHN Q CUSTOMER 1234 MAIN ST YAKIMA WA 12345-0001

128(6)(a)(iv)

ACCOUNT NUMBER: 12345678-001 0 DATE DUE: Aug 23, 2013 AMOUNT DUE: \$238.06 BILLING DATE: Aug 12, 2013 Energy Charge Block 2 1,085 0.0969900 105.23 Bill Assistance Program 0.68 B P A Columbia River Benefits 1,685 kwh -0.0041000 -6.91 (Washington State Utility Tax \$0.94) Late Payment Charge 0.0100000 0.95 **Total New Charges** 143.34

THE ELECTRIC SERVICE AT THE FOLLOWING ADDRESS (ES) IS IN DANGER OF BEING DISCONNECTED DUE TO NON-PAYMENT. THE AMOUNT (S) LISTED BELOW DOES NOT REFLECT ENERGY ASSISTANCE PROGRAM PLEDGES YOU MAY BE RECEIVING:

SERVICE TYPE	SERVICE ADDRESS CERVICE DESCRIPTION	AMOUNT
Electric Service	1234 Main St Yakima. WA 12345-0001	\$94.72
	Residential	

128(6)(a)(ii)

YOU CAN AVOID SHUT-OFF: Your Electric Service will be disconnected according to utility commission rules, unless you take one of the following steps by Aug 23, 2013. 128(6)(a)(i)

- PAY YOUR ELECTRIC SERVICE PAST DUE AMOUNT OF \$94.72; or
- MAKE SATISFACTORY PAYMENT ARRANGEMENT with Pacific Power; or.
- NOTIFY PACIFIC POWER OF A MEDICAL EMERGENCY in the home. If you qualify for a medical emergency, you will be required to submit both written certification from a qualified medical professional that shut-off would create or aggravate a medical condition for you or a member of your household and a minimum of 10% of your delinquent account balance within 5 business days. You will then be eligible for payment arrangements for the remaining account balance.

If after contacting Pacific Power, you feel that the decision to shut off your electric service is wrong, you may appeal to the Washington Utilities and Transportation Commission, whose toll-free telephone number is 1-800-562-6150, or you may write or go to the Consumer Assistance Section, Utilities and Transportation Commission, Chandler Plaza building, 1300 Evergreen Park Drive South, Olympia, Washington 98504, Mail Stop FY-11.

A CHARGE OF (\$15) may be made if it is necessary to send Company personnel to your premises for collection purposes.

128(6)(a)(iii)

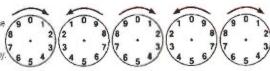
IMPORTANT: If your service is disconnected, you may be required to PAY A DEPOSIT IN ADDITION TO A RECONNECTION CHARGE. If your power is disconnected, Pacific Power's charges and times for reconnecting service are as follows: weekdays from 8 a.m. to 4 p.m. (\$25) and 4 p.m. to 7 p.m. (\$50), weekends and holidays from 8 a.m. to 7p.m. (\$75). The Company will make a reasonable attempt to switch on power for

New Mailing Address or Phone?

Please print your new information below and check the box on the reverse side of this Payment Stub. Thank you.

ACCOUNT NUMBER: 12345678-001 0

If you feel your meter read is incorrect, draw lines where the hands appear on the dials or for digital meters record the numbers shown on the display



AST		FIRST	M.I.
NEW STRE	EET ADDRESS		
CITY			
ST	ZIP	TELEPHONE NUMBER	





128(6)(a)(iv)

BILLING DATE: Aug 12, 2013

ACCOUNT NUMBER: 12345678-001 0

DATE DUE: Aug 23, 2013

AMOUNT DUE: \$238.06

an Applicant or Customer within 24 hours after the Company is notified that all required charges have been paid and any required inspections are finalized.

128(6)(a)

WINTER PAYMENT PLAN: Qualifying income-eligible households may avoid termination of service or have service reconnected during the winter period of November 15 through March 15, by establishing a Winter Payment Plan. To find out if you are eligible for the Winter Payment Plan, please contact one of the Energy Assistance Agencies listed below:

Blue Mountain Action Council (509)529-4980 OIC of Washington (509)248-6751 Northwest Community Action Center (509)865-7630

You will be required to certify your household income for the prior 12 months with the agency and apply for energy assistance and low-income weatherization services. The agency will determine if you are eligible for the Winter Payment Plan and notify Pacific Power. If you are eligible, you must agree to pay all amounts due, including future monthly charges, by the following October 15. The minimum monthly amount you will pay on the Winter Payment Plan during the winter months will be 7 percent of your monthly income, plus 1/12th of the current billing, although you may elect to pay a higher amount. Failure to make your minimum monthly payment may result in service being disconnected.

Please contact us at 1-888-221-7070 to learn more.

128(6)(a)(iv)

Looking for ways to pay?

Visit pacificpower.net/pay for all your options. You can choose to pay online securely with your bank account, pay at a pay station in your community, or pay by phone with a credit/debit card. For details, call 1-888-221-7070.

BILLING DATE: Aug 12, 2013

ACCOUNT NUMBER: 12345678-001 0

DATE DUE: Aug 23, 2013

AMOUNT DUE: \$238.06



Prototype of January 2015 Combined Past Due Notice and Billing Statement



JOHN Q CUSTOMER 1234 MAIN ST YAKIMA WA 12345-0001 Questions: Call 1-888-221-7070 24 hours a day, 7 days a week pacificpower.net

BILLING DATE:

Aug 12, 2013

ACCOUNT NUMBER:

12345678-001 0

DATE DUE:

Historical Data - ITEM 3

Aug 28, 2013

ASSOND JEMAMJJA 2013

AUG 2013

76

1685

56

\$4.75

4116 2012

75

1370

46

\$3.73

Your Average Daily kwh Usage by Month

To report an outage, downed line, or other power emergency, please call 1-

AMOUNT DUE:

PERIOD ENDING

Avg. Daily Temp

Avg. keih per Day

Cost per Day

877-508-5088

Total levh

\$238.06

ACCOUNT PAST DUE

Our records indicate that your account is past due. If the past due amount has been paid, please remember that this bill also contains New Charges.

Your Balance With Us

Previous Account Balance	94.72
Payments/Credits	0.00
Past Due Amount	94.72
New Charges	+143.34
Current Account Balance	\$238.06

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Your Electric Service Past Due Amount of \$94.72 must be received by Aug 28, 2013 to avoid shut-off.

Other ways to avoid Shut-off are shown at the end of this billing statement

Remember:

Your New Charges of \$143.34 are still due by Aug 28, 2013.

Payments Received

No payments have been received since your last billing statement

Detailed Account Activity

ITEM 1 -ELECTRIC SERVICE

1234 Main St Yakima WA Residential Schedule 16

METER	SERVICE PERIOD	ELAPSED	METER READ	NGS	METER	AMOUNT USED	
NUMBER	From To	DAYS	Previous	Current	MULTIPLIER	THIS MONTH	
12345678	Jul 10, 2013 Aug 9, 2013	30	41712	43397	1.0	1,685 kwh	

Next scheduled read date: 08-02. Date may vary due to scheduling or weather.

NEW CHARGES - 08/13	UNITS	COST PER UNIT	CHARGE
Basic Charge – Single Phase			6.00
Energy Charge Block 1	600 kwh	0.0623200	37.39

Write account number on check & mail to: Pacific Power, PO Box 26000, Portland, OR 97256-0001

RETAIN THIS PORTION FOR YOUR RECORDS.

RETURN THIS PORTION WITH YOUR PAYMENT.

ACCOUNT PAST DUE

Late Payment Charge for Washington A late payment charge of 1% may be charged on the delinquent balance per month.

Change of Address or Phone? Check here and provide information on back.

Account Number

12345678-001 0

Date Due:

Aug 28, 2013

AMOUNT DUE:

\$238.06

Please enter the amount enclosed.

JOHN O CUSTOMER 1324 MAIN ST YAKIMA WA 12345-0001

PACIFIC POWER PO BOX 25308

SALT LAKE CITY UT 84125

PACIFIC POWER 1234 MAIN ST YAKIMA WA 12345-0001

H 12345678 001 114 000023806 000009472 000014334

BILLING DATE: Aug 12, 2013	ACCOUNT NUMBER: 1234567	8-001 0 DATE DUE: Aug 28, 2013	AMOUNT DUE: \$238.06
Energy Charge Block 2 Bill Assistance Program	1,085 kw	h 0.0969900	105.23 0.68
B P A Columbia River Benefits (Washington State Utility Tax \$1)	1,685 kw	-0.0041000	-6.91
Late Payment Charge	J.9 4)	0.0100000	0.95
Total New Charges			143.34

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SERVICE TYPE	SERVICE ADDRESS (SERVICE DESCRIPTION	AMOUNT
Electric Service	1234 Main St Yakima. WA 12345-0001 Residential	\$94.72

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- PAY YOUR ELECTRIC SERVICE PAST DUE AMOUNT OF \$94.72; or
- MAKE SATISFACTORY PAYMENT ARRANGEMENT with Pacific Power; or.
- 3. NOTIFY PACIFIC POWER OF A MEDICAL EMERGENCY in the home. If you qualify for a medical emergency, you will be required to submit both written certification from a qualified medical professional that shut-off would create or aggravate a medical condition for you or a member of your household and a minimum of 10% of your delinquent account balance within 5 business days. You will then be eligible for payment arrangements for the remaining account balance.

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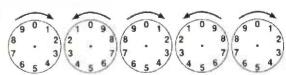
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New Mailing Address or Phone?

Please print your new information below and check the box on the reverse side of this Payment Stub. Thank you.

ACCOUNT NUMBER: 12345678-001 0

If you feel your meter has been read incorrectly, draw lines representing hands as they appear on your meter now, then call toil free 1-888-221-7070.



LAST		FIRST	M.I.
NEW STR	EET ADDRESS		
CITY			
ST	ZIP	TELEPHONE NUMBER	

