

April 15, 2013

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Steven V. King  
Acting Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

**Re: Petition of PacifiCorp for Exemption of WAC 480-100-128(6)(k)**

Dear Mr. King,

In accordance with WAC 480-07-370, WAC 480-07-395 and WAC 480-07-110, enclosed for filing are an original and twelve (12) copies of the above-mentioned petition.

It is respectfully requested that all data requests be addressed in the following manner, with copies to the Company's counsel:

By Email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By Regular Mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232

Please direct any informal inquiries to Barb Coughlin, Director, Customer & Regulatory Liaison, at (503) 331-4306.

Sincerely,



William R. Griffith  
Vice President, Regulation

Enclosures

cc: Thomas Schooley

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Petition for Exemption from Disconnection  
of Service Requirements

DOCKET UE-13 \_\_\_\_\_

PACIFICORP'S PETITION FOR  
EXEMPTION FROM WAC 480-100-128  
REQUIREMENTS

1. In accordance with WAC 480-100-008 and WAC 480-07-110(1), PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company), petitions the Washington Utilities and Transportation Commission (Commission) for exemption of the requirement that employees performing disconnection of service accept payment from customers as contained in WAC 480-100-128(6)(k).
2. PacifiCorp is an electrical company and public service company doing business in the state of Washington under RCW 80.04.010 and is subject to the jurisdiction of the Commission with regard to its public utility operations, retail rates, service, and accounting practices. The Company also provides retail electricity service under the name Pacific Power in Oregon and California and under the name Rocky Mountain Power in the states of Utah, Wyoming, and Idaho. PacifiCorp's principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon, 97232.
3. PacifiCorp's name and address:

PacifiCorp Washington Dockets  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232  
[Washington.Dockets@PacifiCorp.com](mailto:Washington.Dockets@PacifiCorp.com)

Michelle R. Mishoe  
Legal Counsel  
825 NE Multnomah Street, Suite 1800  
Portland, OR 97232  
Phone: (503) 813-5977  
[michelle.mishoe@pacificorp.com](mailto:michelle.mishoe@pacificorp.com)

In addition, PacifiCorp respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred)

[datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail

Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Barb Coughlin, Director, Customer & Regulatory Liaison, at (503) 331-4306.

4. WAC 480-100-128(6)(k) requires Company employees dispatched to disconnect electric service for nonpayment to accept payment from customers:

*(k) A utility representative dispatched to disconnect service must accept payment of a delinquent account at the service address, but will not be required to give change for cash paid in excess of the amount due and owing. The utility must credit any over-payment to the customer's account. The utility may charge a fee for the disconnection visit to the service address if provided for in the utility's tariff; (emphasis added)*

Field employees who carry money or collect money from customers have the potential to experience a hostile interaction leading to injury, or even worse, death. Field employees who are known to carry money in their vehicle are inherently at risk for being attacked and robbed as they travel their daily route.

5. A disturbing incident took place recently in Mississippi that has prompted the Company to evaluate the impact of the requirement in WAC 480-100-128(6)(k) to its employees' safety. Below is the account of that incident as shared by metering management with East Mississippi Electric Power Association:

On June 26, 2012, Nathan Baker, a serviceman with East Mississippi Electric Power Association was reported missing. Nathan had visited a customer's home to collect on a delinquent account the day before. This would cost Nathan his life. The owner of the house beat Nathan with a shovel while he was disconnecting the service. In an attempt to avoid further harm, Nathan started to

run away. The owner would catch up to Nathan and shoot Nathan in the back. After Nathan fell to the ground, the owner shot Nathan in the head. The owner then took the cash/customer payments Nathan had collected before the fateful visit to this residence.

6. PacifiCorp can no longer support business practices that allow for the risk of injury or death to an employee. Safety is a top priority for the Company and the goal is to reduce the risk of harm to its employees. One way to do that is to eliminate the requirement that an employee will be carrying customer payments. This would reduce the risk of an employee becoming a target, eliminate the risk of customer's personal banking information being stolen and used fraudulently, and eliminate the opportunity for theft of cash.

7. The Commission may grant an exemption of its rules "if consistent with the public interest, the purposes underlying the regulation, and applicable statutes." WAC 480-07-110(1). Ensuring a safe working environment for employees is in the public interest. Additionally PacifiCorp's request is consistent with underlying rules and applicable statutes. Over the past decade, new payment methods have been made available to customers. In addition to the traditional methods of paying by check or money order through the United States mail, pay stations, or drop boxes, or paying by cash at pay stations, the Company also offers customers the options of online payment through the Company's website and pay-by-telephone.

Some of these methods, such as online payment and pay-by-telephone, provide almost immediate account updating and may take place inside a customer's home. It is no longer necessary for employees to accept payments in the field. Eliminating this payment method will increase safety for employees without sacrificing customer service.

PacifiCorp's petition is consistent with the standards for granting an exemption from the Commission's rules.

8. The Company recently implemented a similar change in Utah beginning October 1, 2012, which has been successful. Following a two-month communications campaign in Utah to inform customers with past due balances of this new practice, customers have an understanding of this change. PacifiCorp used a combination of bill messages on bills with past due account balances, door hanger messaging, and individual handouts given to customers by collectors and managers communicating this change to its customers with past due balances (see Exhibit A). Call center personnel were advised of the change and communicated it to customers calling the Company regarding past due balances. To date, the Company has not received any escalated customer issues or commission complaints due to the change in business practice. The Company will be able to draw from this experience and launch a similar communications campaign in Washington if this petition is approved.

9. For the reasons stated above, PacifiCorp respectfully requests an exemption from the requirement to accept payment while onsite for disconnection as stated WAC 480-100-128(6)(k).

DATED: this 15<sup>th</sup> day of April, 2013.

Respectfully submitted,



Michelle R. Mishoe  
Legal Counsel  
Pacific Power  
825 NE Multnomah, Ste 1800  
Portland, OR 97232

## PACIFICORP COMMUNICATION OF FIELD COLLECTION POLICY CHANGE IN UTAH

Utah Card – Side 1 English, Side 2 Spanish:

### To our valued customers:

As of October 1, 2012 we are no longer able to collect customer payments when our employees come to your home or business. We have several payment options available once your account is past due:

- Pay online
- Pay by phone (fees apply)

If you need further arrangements or other payment options, please call our toll-free customer service number **1-888-221-7070**.

This change was made for employee safety and security of customer payments. It also helps reduce costs for all our customers.

We appreciate your patience and understanding. It's a pleasure to serve you.



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### A nuestros apreciados clientes:

A partir del 1 de octubre de 2012, nuestros empleados ya no podrán aceptar los pagos directamente de los clientes nuestros cuando van a su casa o negocio. Tenemos varias opciones de pago disponibles una vez que se ha vencido el plazo de pago:

- Pago en línea por Internet
- Pago por teléfono (se aplican cargos)

Para realizar otros arreglos o para otras opciones de pago, por favor llame a nuestro número gratuito de servicio al cliente al **1-888-225-2611**.

Este cambio es por razones de seguridad para nuestros empleados y para la seguridad de los pagos de nuestros clientes. También ayuda a reducir los costos para todos nuestros clientes.

Apreciamos su paciencia y comprensión. Es un placer servirle.



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