

Summary of Comments

The Commission received responses to its March 18, 2022, Notice of Opportunity to Submit Comments regarding potential changes to current customer notice, credit and collections rules for the natural gas (WAC 480-90) and electric (WAC 480-100) industries. The following investor-owned utilities have submitted their comments: Avista Corporation (Avista), Cascade Natural Gas Company (Cascade), Northwest Natural Gas Company (NW Natural), Pacific Power and Light (PacifiCorp) and Puget Sound Energy (PSE).

The following customer advocates have provided responses: Northwest Energy Coalition (NVEC), Public Counsel of the Washington State Attorney General’s Office (Public Counsel), and The Energy Project (TEP).

Comparisons of the utility’s’ responses containing numerical data can be found in Appendix A at the end of this document.

Questions for Consideration

1. Does your company currently have a residential disconnection and/or reconnection fee in its filed tariff?

a. If so, please provide citations to all appropriate tariff references.

Question	Summary of Comments
Avista	
1a.	Yes, Avista charges residential reconnection fees in instances where a premise visit is required to reconnect electric service and in all cases for natural gas service. Regarding disconnection fees, or “field visit fees”, the Company discontinued charging such fees in 2020.1 Please see the “Miscellaneous Charges” section of each of Avista’s respective “Rules and Regulations” tariffs—Schedule 70-Q, Section 16(B), for electric and Schedule 170-Q, Section 18(B), for natural gas—for further information. The reconnection fee for electric, when applicable, and natural gas service is \$16 during business hours and \$32 after business hours.
Cascade	
1a.	Schedule 200, Miscellaneous Charges, and Rule 5, Disconnection and Reconnection of Service, both have information pertaining to disconnection and reconnection of residential customers.
NW Natural	
1a.	Yes. The processes for disconnection and reconnection are provided in Rule 5 Disconnection and Reconnection Procedures of NW Natural’s tariff. Reconnection fees are described in Schedule C Miscellaneous Charges (see Sheet C.1 and Sheet C.2). Please see NW Natural Washington Tariff – Rule 5 here or included as Attachment 1. Please see NW Natural Washington Tariff – Schedule C here or included as Attachment 2.
PacifiCorp	
1a.	PacifiCorp has reconnection charges under Tariff Schedule 300. PacifiCorp does not have a disconnection charge. Rule 11D provides the context in which a customer is asked to pay a reconnection charge and Schedule 300 provides detail on the reconnection charges.
PSE	
1a.	Electric Tariff G (WN U-60): Schedule 80 General Rules and Regulations, Section 30 Disconnection Visit Charge (Sheet No. 80-Z.1), Schedule 80 Section 18 Connection and Reconnection Charges (Sheet No. 80-R.1) Natural Gas Tariff (WN U-2): Rule No. 9: Bills and Payment for Service, Section 7 Connection and Reconnection Charges (Beginning on Sheet No. 21-B),

	Rule NO. 9 Bills and Payment for Service, Section 10 Disconnection Visit Charge (Sheet No. 21-C)
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2. Please provide the following information regarding the fees your company collected in 2018 and 2019, respectively:

a. Please provide the total dollar amount collected from residential customers for disconnection fees and reconnection fees each year, identifying each fee category separately.

b. Please provide the total number of residential customer accounts and the number of customer accounts assessed disconnection fees or reconnection fees each year. Please identify each fee category separately, include only reconnection fees for previously disconnected customers, and exclude new customers reconnecting at an existing service address.

c. Please provide the percentage of retail revenue your company derived from residential customer disconnection fees and reconnection fees each year, identifying each fee category separately.

d. If these disconnection fees and reconnection fees were removed from the company's tariff and recovered in base rates instead, how much would residential bills increase based on your company's currently approved rate spread? Please provide both a percentage increase and an average residential customer bill increase amount.

Question	Summary of Comments		
Avista			
2a.	The table below reflects the total amount collected for both reconnection fees and disconnection fees in 2018 and 2019. The Company no longer assesses field visit fees.		
		2018	2019
	Electric Field Visit Disconnect	\$7,584	\$4,096
	Natural Gas Field Visit Disconnect	\$152	\$128
	Electric Reconnect	\$119,800	\$164,061
	Natural Gas Reconnect	\$3,926	\$4,080
2b.	The table below provides the total number of customers assessed disconnection and reconnection fees in 2018 and 2019.		
		2018	2019
	Electric Field Visit Disconnect	947	512
	Natural Gas Field Visit Disconnect	18	16
	Electric Reconnect	6046	8274
	Natural Gas Reconnect	192	194
2c.	Please see the table below, which outlines the percent of retail revenue derived from reconnection and disconnection fees in 2018 and 2019.		
		2018	2019
	Electric Field Visit Disconnect	0.002%	0.001%
	Natural Gas Field Visit Disconnect	0.00004%	0.00004%
	Electric Reconnect	0.030%	0.050%
	Natural Gas Reconnect	0.001%	0.001%

Question	Summary of Comments																		
2d.	If fees for field visit disconnects and reconnects were removed from Avista’s tariff and recovered in base rates instead, natural gas reconnect fees are minimal and would have a 0% impact on revenue and customer bills. The electric reconnect fees would account for an approximate 0.52% impact on billed revenue and increase an average residential customer’s bill using 932 kwh by \$0.10/mo., or 0.09% from \$85.52 to \$85.62. Revenue derived from electric and natural gas field visit fees are not included in the calculations pertaining to this response as the Company no longer assesses electric or natural gas field visit fees.																		
Cascade																			
2a.	Cascade Natural Gas does not collect disconnection fees. CNGC does collect a Field Visit fee of \$10 when a technician visits a customer’s premise to disconnect service and that customer takes action to avoid being disconnected - e.g. the customer pays cash at the door or goes to visit a payment location to make a payment. Those fees are included in the total dollar amount of fees and total number of accounts assessed fees. The data also includes reconnection fees for reconnects worked during regular business hours and after hours. 2018 - \$83,971.79 (Field Visit Charge = \$10,484.80) 2019 - \$72,679.96 (Field Visit Charge = \$8,773.28)																		
2b.	2018 – 3,464 (Field Visit Charge = 1,044) 2019 – 3,058 (Field Visit Charge = 874)																		
2c.	2018 - 0.037% 2019 - 0.029%																		
2d.	Cascade’s last approved rate spread was an equal percentage to all customer classes; thus, the percentages reflected in part (c) would be the percentage increase to all customer classes. Using the current average residential bill of \$54.08, or 0.05% ¹ . The average increase amount would be the following: 2018 - \$0.02023 per month per residential customer 2019 - \$0.01589 per month per residential customer																		
NW Natural																			
2a.	Please note NW Natural charges reconnection fees and does not charge disconnection fees. The table includes the total number of fees charged along with the counts of both associated distinct customers and distinct accounts to take into account prior obligation accounts. <table border="1" data-bbox="358 1262 1317 1478"> <thead> <tr> <th data-bbox="358 1262 461 1388">Year</th> <th data-bbox="461 1262 651 1388">Total Residential Customers</th> <th data-bbox="651 1262 857 1388">Distinct Customers Charged Fee</th> <th data-bbox="857 1262 1057 1388">Distinct Accounts Associated w/ Fees</th> <th data-bbox="1057 1262 1170 1388">Fee Count</th> <th data-bbox="1170 1262 1317 1388">Fee Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="358 1388 461 1444">2018</td> <td data-bbox="461 1388 651 1444">77,357</td> <td data-bbox="651 1388 857 1444">1,102</td> <td data-bbox="857 1388 1057 1444">1,132</td> <td data-bbox="1057 1388 1170 1444">1,256</td> <td data-bbox="1170 1388 1317 1444">\$50,275</td> </tr> <tr> <td data-bbox="358 1444 461 1478">2019</td> <td data-bbox="461 1444 651 1478">80,116</td> <td data-bbox="651 1444 857 1478">1,051</td> <td data-bbox="857 1444 1057 1478">1,083</td> <td data-bbox="1057 1444 1170 1478">1,224</td> <td data-bbox="1170 1444 1317 1478">\$49,275</td> </tr> </tbody> </table>	Year	Total Residential Customers	Distinct Customers Charged Fee	Distinct Accounts Associated w/ Fees	Fee Count	Fee Total	2018	77,357	1,102	1,132	1,256	\$50,275	2019	80,116	1,051	1,083	1,224	\$49,275
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2019	80,116	1,051	1,083	1,224	\$49,275														
2b.	<i>See above table for response to 2b.</i>																		
2c.	The Company derived 0.08% of retail revenue from reconnection fees for each year, 2018 and 2019.																		

¹ CNGC was able to provide the percent increase through follow up communications with staff.

2d.	Using the 2019 reconnection fees and the Company’s most current compliance filing in UG-200994, a residential bill would increase \$0.04, or 0.06%.																										
PacifiCorp																											
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2b.	PSE provided the total residential customer accounts as of December 31. A single customer account may have been assessed multiple fees. For example, the same customer may have been charged a disconnection visit fee and a reconnection fee in the same year or in both 2018 and 2019																										

		TOTAL RESIDENTIAL CUSTOMER ACCOUNTS		
	CUSTOMER TYPE	2018	2019	
	Residential	1,417,061	1,437,391	
		# CUSTOMERS ASSESSED FEES		
	CUSTOMER TYPE	FEE TYPE	2018	2019
	Residential	Disconnection Visit Fees	22,934	19,694
		Reconnection Fees	40,699	34,043
2c.		% OF RETAIL REVENUE		
	CUSTOMER TYPE	FEE TYPE	2018	2019
	Residential	Disconnection Visit Fees	0.011%	0.009%
		Reconnection Fees	0.047%	0.039%
2d.	Residential bill impacts were calculated using 900kWh for electric residential customers and 64 therms for residential gas customers. Residential bill impacts were calculated using 2018 data.			
		Average Bill		
	CUSTOMER TYPE	Bill Increase Percentage	Bill Increase Amount	
	Electric Residential	0.15%	\$ 0.14	
	Gas Residential	0.06%	\$ 0.04	
Public Counsel				
2d.	Public Counsel challenges the assumption that costs associated with disconnection and reconnection are not currently recovered in base rates. Utilities include employee costs and operating costs in rates, causing Public Counsel to question whether base rates already contain costs associated with disconnection and reconnection. Specifically, would increasing base rates to account for elimination of disconnection and reconnection fees cause the utility to recover the same expenses twice? Public Counsel looks forward to examining the utilities' information provided in answer to Question 2(d).			

3. Please provide the following information regarding the cost of disconnection and reconnection in 2018 and 2019, respectively, identifying each fee category separately.

- a. What is the total cost the company incurred disconnecting residential customers each year?
- b. What is the total cost the company incurred reconnecting residential customers each year?
- c. What is the average annual cost for disconnection and reconnection by year?
- d. If your company has deployed advanced metering infrastructure (AMI), please provide separately a cost breakdown of disconnection and reconnection fees for residential customers with AMI meters installed. Please also provide a side-by-side comparison of costs incurred both to disconnect and reconnect non-communicating meters with costs incurred to disconnect and reconnect AMI meters.

Question	Summary of Comments
Avista	

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3.	<p>Avista does not specifically track the total costs incurred to disconnect or reconnect residential customers each year. The costs of each individual premise visit may vary due to the time of day (business hours vs. overtime) and the Company employee available and assigned to perform the disconnection/reconnection. Based on an estimated timeframe (including travel time and duration of disconnect/reconnect process) of 25 minutes for metropolitan areas and 30 minutes for rural locations, the table below provides an approximation of the cost per premise visit incurred for disconnections and reconnections based on these estimates. Due to the variability in costs for each visit as described above, the Company is unable to approximate an annual average cost by year.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="5">Cost per Premise Visit</th> </tr> <tr> <th>2018</th> <th>Cost for Metro (Business Hrs)</th> <th>Cost for Rural (Business Hrs)</th> <th>Cost for Metro (After Hrs)</th> <th>Cost for Rural (After Hrs)</th> </tr> </thead> <tbody> <tr> <td>Elec Svcmn</td> <td>\$ 48.29</td> <td>\$ 57.91</td> <td>\$ 59.21</td> <td>\$ 71.00</td> </tr> <tr> <td>Gas Svcmn</td> <td>\$ 36.94</td> <td>\$ 44.29</td> <td>\$ 46.67</td> <td>\$ 46.67</td> </tr> <tr> <td>Jnn Meterman</td> <td>\$ 43.20</td> <td>\$ 51.80</td> <td>\$ 53.80</td> <td>\$ 53.80</td> </tr> <tr> <td>OSM</td> <td>\$ 37.06</td> <td>\$ 44.44</td> <td>\$ 45.54</td> <td>\$ 45.54</td> </tr> <tr> <th>2019</th> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Elec Svcmn</td> <td>\$ 47.44</td> <td>\$ 56.88</td> <td>\$ 58.51</td> <td>\$ 70.15</td> </tr> <tr> <td>Gas Svcmn</td> <td>\$ 38.03</td> <td>\$ 45.60</td> <td>\$ 47.90</td> <td>\$ 57.43</td> </tr> <tr> <td>Jnn Meterman</td> <td>\$ 38.14</td> <td>\$ 45.73</td> <td>\$ 48.88</td> <td>\$ 58.61</td> </tr> <tr> <td>OSM</td> <td>\$ 31.76</td> <td>\$ 38.08</td> <td>\$ 40.35</td> <td>\$ 48.39</td> </tr> <tr> <td>Loc Rep Elec</td> <td>\$ 50.82</td> <td>\$ 60.93</td> <td>\$ 48.43</td> <td>\$ 58.07</td> </tr> </tbody> </table>	Cost per Premise Visit					2018	Cost for Metro (Business Hrs)	Cost for Rural (Business Hrs)	Cost for Metro (After Hrs)	Cost for Rural (After Hrs)	Elec Svcmn	\$ 48.29	\$ 57.91	\$ 59.21	\$ 71.00	Gas Svcmn	\$ 36.94	\$ 44.29	\$ 46.67	\$ 46.67	Jnn Meterman	\$ 43.20	\$ 51.80	\$ 53.80	\$ 53.80	OSM	\$ 37.06	\$ 44.44	\$ 45.54	\$ 45.54	2019					Elec Svcmn	\$ 47.44	\$ 56.88	\$ 58.51	\$ 70.15	Gas Svcmn	\$ 38.03	\$ 45.60	\$ 47.90	\$ 57.43	Jnn Meterman	\$ 38.14	\$ 45.73	\$ 48.88	\$ 58.61	OSM	\$ 31.76	\$ 38.08	\$ 40.35	\$ 48.39	Loc Rep Elec	\$ 50.82	\$ 60.93	\$ 48.43	\$ 58.07
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3d.	<p>As is the nature of AMI, the costs incurred to disconnect and reconnect these meters remotely are incorporated into various costs sustained by the Company under normal operating conditions, as these actions are automatically built into Avista’s existing technology systems and are therefore difficult to discern. If an AMI meter is somehow unable to perform a remote disconnection or reconnection, and the process then needs manual intervention from an Avista employee, the costs incurred are variable and with this being a rare occurrence, such costs are not included in this response. Costs encountered during the actual request for reconnect (speaking with a Customer Service Representative (CSR), for example) are also not included in this response. Provided in the table below is the number of remote reconnects and disconnects that occurred in 2018 and 2019, as well as those that occurred via a field representative; these numbers are for electric service only, as Avista does not remotely disconnect or reconnect natural gas service.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>YEAR</th> <th>Field Visit Disconnect</th> <th>AMI Disconnect</th> <th>Field Visit Reconnect</th> <th>AMI Reconnect</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>6,560</td> <td>0</td> <td>6,061</td> <td>0</td> </tr> <tr> <td>2019</td> <td>4,221</td> <td>4,811</td> <td>4,106</td> <td>4,779</td> </tr> </tbody> </table>	YEAR	Field Visit Disconnect	AMI Disconnect	Field Visit Reconnect	AMI Reconnect	2018	6,560	0	6,061	0	2019	4,221	4,811	4,106	4,779																																													
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3.	Please note, it has been several years since Cascade Natural Gas has evaluated our fee schedule or done a recent time study. For this response, Cascade estimated costs for service field trips based on general loaded labor and equipment rates.																																																												
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² Avista was able to provide additional premise visit cost information through follow up communications with staff.

3c.	It is unclear what exactly is being asked for within the question, but the average annual disconnect cost was \$228,230 and the average annual recovery cost was \$100,900 over the two periods.			
3d.	Cascade does not have AMI or remote capabilities.			
NW Natural				
3.	<i>Responses are provided below in subsections 3a - 3d.</i>			
3a.	The Company estimates costs for disconnections as follows – please note these numbers reflect Total Company (Oregon and Washington) numbers.			
		2018	2019	
	All Disconnections	\$1,214,408	\$1,210,143	\$136,985
	Disconnections for non-payment	\$862,501	\$844,226	\$97,290
3b.	The Company estimates costs for reconnections as follows – please note these numbers reflect Total Company (Oregon and Washington) numbers:			
		2018	2019	
	All Reconnections	\$2,584,605	\$2,400,986	\$291,543
	Reconnections after disconnection for non-payment	\$800,297	\$749,026	\$90,274
3c.	The Company estimates the average annual cost per disconnection and reconnections as follows – please note these numbers reflect Total Company (Oregon and Washington) numbers:			
		2018	2019	
	All Disconnections	\$25.25	\$26.03	
	Disconnections for non-payment	\$24.63	\$25.07	
	All reconnections	\$66.41	\$66.12	
	Reconnections after disconnection for non-payment	\$61.14	\$60.86	
3d.	This question is not applicable to NW Natural; we have not deployed advanced metering infrastructure.			
PacifiCorp				
3.	PacifiCorp does not have a specific charge for disconnection of service and does not track the specific costs for disconnecting or reconnecting service. PacifiCorp estimated the costs below based on the average calculation of time to do the reconnection of service, the wage of the employee doing the work, and how many disconnection and reconnection requests were completed. PacifiCorp estimates the cost of disconnecting service to be commensurate with the cost of reconnecting service during normal office hours.			
3a.	Estimated Disconnection of Service Costs			
	Category	2018	2019	
	Disconnection	\$45,835.06	\$33,260.84	
3b.	Estimated Reconnection of Service Costs			
	Category	2018	2019	
	Reconnection - Normal Office Hours	\$29,347.80	\$18,634.66	
	Reconnection - After Hours	\$12,452.00	\$11,528.00	
	Reconnection - Weekend/Holiday	\$2,912.26	\$2,688.24	
	Total	\$44,712.06	\$32,850.90	

3c.	Estimated Average Annual Cost per Disconnection & Reconnection by Year				
	Category	2018		2019	
	Disconnection	\$23.86		\$23.86	
	Reconnection	\$33.10		\$37.50	
3d.	PacifiCorp has not deployed AMI in Washington.				
PSE					
3.	<i>Responses are provided below in subsections 3a - 3d³.</i>				
3a.	PSE's response below includes just residential customers.				
		Disconnection Cost			
	Fee Category	2018	2019	2018	2019
	Call Center	\$1,480,603.38	\$1,233,151.02	\$1,450,991.31	\$1,196,156.49
	Phone Outreach	\$1,859,900.80	\$2,101,625.60	\$1,766,905.76	\$2,017,560.58
	Customer Notices	\$767,948.87	\$980,848.08	\$729,551.43	\$941,614.61
	Field Operations	\$1,711,503.16	\$1,456,240.74	\$1,677,273.10	\$1,412,553.51
	Total	\$5,819,956.21	\$5,771,865.44	\$5,624,721.60	\$5,567,884.74
3b.	PSE's response below includes just residential customers.				
		Reconnection Cost			
	Fee Category	2018	2019	2018	2019
	Call Center	\$1,251,039.34	\$1,051,587.46	\$1,200,997.77	\$1,009,523.96
	Field Operations	\$1,573,579.86	\$1,343,955.86	\$1,542,108.27	\$1,303,637.18
	Total	\$2,824,619.20	\$2,395,543.32	\$2,743,106.04	\$2,313,884.74
3c.		Total Cost Incurred			
	Cost Type	2018	2019		
	Disconnection	\$126.49	\$150.48		
	Reconnection	\$68.84	\$69.39		
	Combined	\$99.31	\$112.07		
3d.	Puget Sound Energy has begun deploying advanced metering infrastructure (AMI). The deployment is ongoing through 2024. The cost of disconnection and reconnection fees for residential customers with AMI meters is \$0. Customers that have elected to have a non-communicating meter (NCM) meter are required to pay the ongoing administrative and				

³ Responses to 3a and 3b were updated to include only residential customers through follow up communication with staff.

	operational cost associated with the manual reading of the non-communicating meter, and other fees and charges associated with the non-communicating metering service that may be assessed for each eligible meter. There is a one-time charge of \$90 for each NCM meter for Electric, \$50 for each NCM meter for Gas, and an additional bi-monthly service charge of \$15 per NCM meter. There are Terms and Conditions the customer needs to maintain in order to continue service with an NCM meter, if they do not meet the terms the meter may be switched out to an AMI meter, or at any time the customer may also request the meter be switched out with advance notice to the Company.
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4. Please provide the following information related to residential disconnections for non-payment in 2018 and 2019, respectively.

a. The number of disconnections

b. The average duration of disconnection

c. The average duration of disconnection for non-payment for low-income customers each year?

Question	Summary of Comments						
Avista							
4.	<i>Responses are provided below in subsections 4a – 4c.</i>						
4a.	<p>Please see the table below for the total number of customers disconnected for non-payment in 2018 and 2019, respectively.</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>YEAR</th> <th>Total Customers</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>6,560</td> </tr> <tr> <td>2019</td> <td>9,032</td> </tr> </tbody> </table>	YEAR	Total Customers	2018	6,560	2019	9,032
YEAR	Total Customers						
2018	6,560						
2019	9,032						
4b.	<p>The average duration (portrayed in hours) for residential disconnections for non-payment is displayed in the table below. The average disconnect duration in 2019 is shorter than the average disconnect duration in 2018 due to the increase of installed AMI meters. The present average disconnect duration for customers with AMI meters is 9.35 hours. For customers with AMI meters, reconnection occurs within 15 minutes once a satisfactory reconnect payment or payment arrangement is made by the customer.</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>YEAR</th> <th>Average Duration - Hours</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>19.83</td> </tr> <tr> <td>2019</td> <td>12.73</td> </tr> </tbody> </table>	YEAR	Average Duration - Hours	2018	19.83	2019	12.73
YEAR	Average Duration - Hours						
2018	19.83						
2019	12.73						
4c.	<p>This table reflects the average duration (portrayed in hours) for residential low-income disconnections for non-payment. As mentioned in (b) above, the average disconnect duration in 2019 is shorter than the average disconnect duration in 2018 due to the increase of installed AMI meters.</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>YEAR</th> <th>Avg. Low-Income Duration - Hours</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>20.24</td> </tr> <tr> <td>2019</td> <td>13.09</td> </tr> </tbody> </table>	YEAR	Avg. Low-Income Duration - Hours	2018	20.24	2019	13.09
YEAR	Avg. Low-Income Duration - Hours						
2018	20.24						
2019	13.09						
Cascade							
4.	<i>Responses are provided below in subsections 4a – 4c.</i>						
4a.	<p>2018 – 3387 2019 – 2944</p>						
4b.	<p>2018 – 37.09 days 2019 – 37.88 days</p>						

4c.	2018 – 23.46 days 2019 – 28.42 days		
NW Natural			
4.	<i>Responses are provided below in subsections 4a – 4c.</i>		
4a.	The first row reflects disconnects where reconnects occurred at the same premise for the same customer.		
	Disconnects for non-payment	2018	2019
	Disconnection with Reconnection	1,288	1,254
	Average Duration of Disconnection (days)	10	9
	Disconnection with no Reconnection	291	302
4b.	<i>See above table for response to 4b.</i>		
4c.	The first row reflects disconnects where reconnects occurred at the same premise for the same customer.		
	Disconnects for non-payment - Low-Income	2018	2019
	Disconnection with Reconnection	55	41
	Average Duration of Disconnection (days)	17	6
	Disconnection with no Reconnection	4	6
PacifiCorp			
4.	Category	2018	2019
	Number of Disconnections	1,952	1,375
	Average Duration (Days)	0.85	0.86
	Low Income Average Duration (Days)	0.93	0.76
	* Note: Counts represent unique customer agreements.		
4a.	<i>See above table for response to 4a.</i>		
4b.	<i>See above table for response to 4b.</i>		
4c.	<i>See above table for response to 4c.</i>		
PSE			
4.	<i>Responses are provided below in subsections 4a – 4c.</i>		
4a.		# of Disconnections	
	Customer type	2018	2019
	Residential	47,708	39,644
4b.	PSE is not able to break this data down any further than whole day increments (meaning if a customer was disconnected and reconnected same day, PSE will display this as 0 as we cannot provide the data at an exact hour/min/sec breakdown). The vast majority of customers are reconnected the same day or next day. Customers whose reconnection occurred more than 30 days post disconnection have been excluded from the average. This eliminates the minimal severe outliers which are likely data quality issues (e.g. reconnection date or disconnection date populated incorrectly in the data, disconnection cycle number populated incorrectly, or commercial customer incorrectly identified as residential, etc.).		
		Average Duration (Days)	
	Customer type	2018	2019
	Residential	1.9	1.9

4c.	<p>PSE is not able to break this data down any further than whole day increments (meaning if a customer was disconnected and reconnected same day, PSE will display this as 0 as we cannot provide the data at an exact hour/min/sec breakdown). The vast majority of customers are reconnected the same day or next day. Customers whose reconnection occurred more than 30 days post disconnection have been excluded from the average. This eliminates the minimal severe outliers which are likely data quality issues (e.g. reconnection date or disconnection date populated incorrectly in the data, disconnection cycle number populated incorrectly, or commercial customer incorrectly identified as residential, etc.).</p> <p>Low-income is defined as anyone who received PSE HELP, LIHEAP, or Salvation Army pledge assistance during calendar years 2018 and 2019. The timeframe is determined by the clearing date of the pledge (i.e. when it cleared the customer’s account).</p>	
	Average Duration (Days)	
	Customer type	2018
Residential	1.8	1.8

5. Please provide the following information regarding disconnections among low-income residential customers:

a. In each of 2018 and 2019, what percentage of total residential customer disconnection fees and reconnection fees were charged to low-income customers? Please identify the percentage for each fee category separately.

b. What percentage of customers facing disconnection successfully applied for and received energy assistance that allowed them to avoid disconnection in 2018 and 2019, respectively?

Question	Summary of Comments																																																							
Avista																																																								
5.	<i>Responses are provided below in subsections 5a – 5b.</i>																																																							
5a.	<p>The percent of low-income customers that received disconnection and/or reconnection fees in 2018 and 2019 are depicted in the table below.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Fee Type</th> <th>Total Customers</th> <th>Non-Low Income</th> <th>Low-Income</th> <th>% Low-Income</th> </tr> </thead> <tbody> <tr> <td colspan="5">2018</td> </tr> <tr> <td>Electric Field Visit Disconnect</td> <td style="text-align: center;">947</td> <td style="text-align: center;">679</td> <td style="text-align: center;">268</td> <td style="text-align: center;">28%</td> </tr> <tr> <td>Natural Gas Field Visit Disconnect</td> <td style="text-align: center;">18</td> <td style="text-align: center;">17</td> <td style="text-align: center;">1</td> <td style="text-align: center;">6%</td> </tr> <tr> <td>Electric Reconnect</td> <td style="text-align: center;">6,046</td> <td style="text-align: center;">4,331</td> <td style="text-align: center;">1,715</td> <td style="text-align: center;">28%</td> </tr> <tr> <td>Natural Gas Reconnect</td> <td style="text-align: center;">192</td> <td style="text-align: center;">169</td> <td style="text-align: center;">23</td> <td style="text-align: center;">12%</td> </tr> <tr> <td colspan="5">2019</td> </tr> <tr> <td>Electric Field Visit Disconnect</td> <td style="text-align: center;">512</td> <td style="text-align: center;">385</td> <td style="text-align: center;">127</td> <td style="text-align: center;">25%</td> </tr> <tr> <td>Natural Gas Field Visit Disconnect</td> <td style="text-align: center;">16</td> <td style="text-align: center;">14</td> <td style="text-align: center;">2</td> <td style="text-align: center;">13%</td> </tr> <tr> <td>Electric Reconnect</td> <td style="text-align: center;">8,274</td> <td style="text-align: center;">6,037</td> <td style="text-align: center;">2,237</td> <td style="text-align: center;">27%</td> </tr> <tr> <td>Natural Gas Reconnect</td> <td style="text-align: center;">194</td> <td style="text-align: center;">174</td> <td style="text-align: center;">20</td> <td style="text-align: center;">10%</td> </tr> </tbody> </table>	Fee Type	Total Customers	Non-Low Income	Low-Income	% Low-Income	2018					Electric Field Visit Disconnect	947	679	268	28%	Natural Gas Field Visit Disconnect	18	17	1	6%	Electric Reconnect	6,046	4,331	1,715	28%	Natural Gas Reconnect	192	169	23	12%	2019					Electric Field Visit Disconnect	512	385	127	25%	Natural Gas Field Visit Disconnect	16	14	2	13%	Electric Reconnect	8,274	6,037	2,237	27%	Natural Gas Reconnect	194	174	20	10%
Fee Type	Total Customers	Non-Low Income	Low-Income	% Low-Income																																																				
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Question	Summary of Comments				
5b.	The table below provides the percent of customers who successfully applied for and received energy assistance to avoid disconnection of service for non-payment in 2018 and 2019.				
	Year	Received Energy Assistance	Total Collections	% Low-Income	
	2018	6,273	119,491	5%	
	2019	6,756	123,325	5%	
Cascade					
5.	Cascade Natural Gas does not collect disconnection fees. CNGC does collect a Field Visit fee of \$10 when a technician visits a customer’s premise to disconnect service and that customer takes action to avoid being disconnected - e.g. the customer pays cash at the door or goes to visit a payment location to make a payment. Those fees are included in the total dollar amount of fees and total number of accounts assessed fees. The data also includes reconnection fees for reconnects worked during regular business hours and after hours.				
5a.	2018 – 4.1% 2019 – 2.8%				
5b.	2018 - 3% of low-income customers having received an Urgent disconnection notice received some form of energy assistance to avoid disconnection.* 2019 – 2.5% of low-income customers having received an Urgent disconnection notice received some form of energy assistance to avoid disconnection.* *% shown may be understated when considering in 2018 and 2019 not all customers receiving an Urgent notice were eligible for disconnection. Accounts were reviewed for risk factors such as length of service, time since last payment and account balance and only those deemed highest risk were considered for disconnection. CNGC does not have a list of the accounts considered highest risk, therefore, we utilized the list of customers receiving a disconnect notice to identify customers at risk of disconnection.				
NW Natural					
5.	<i>Responses are provided below in subsections 5a – 5b.</i>				
5a.	Please note NW Natural charges reconnection fees and does not charge disconnection fees. The percentage of reconnection fees charged in 2018 and 2019 to low-income residential customers was 4.54% and 3.10%, respectively. Note – low income is defined as any energy assistance received by the customer during calendar years 2018 or 2019.				
5b.	2018 – 0.36%		2019 – 0.29%		
PacifiCorp					
5.	<i>Responses are provided below in subsections 5a – 5b.</i>				
5a.	Category	2018	%	2019	%
	Reconnect Charge - Weekend / Holiday Hours	\$75	7.7%	\$75	9.0%
	Reconnect Charge - After Hours	\$500	9.3%	\$400	9.7%
	Reconnect Charge - Normal Office Hours	\$4,550	14.8%	\$2,025	10.4%
	Total	\$5,740	13.9%	\$3,056	10.8%
5b.	Category	2018	2019		
	% of customers successfully applying for and receiving energy assistance payments and avoiding disconnection	0.21%	0.11%		
PSE					
5.	<i>Responses are provided below in subsections 5a – 5b.</i>				

5a.	<p>In each of 2018 and 2019, what percentage of total residential customer disconnection fees and reconnection fees were charged to low-income customers? Please identify the percentage for each fee category separately.</p>															
<table border="1"> <thead> <tr> <th colspan="2"></th> <th colspan="2">YEAR</th> </tr> <tr> <th>Customer Type</th> <th>Fee Type</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Residential</td> <td>Disconnection Visit Fees</td> <td>8.8%</td> <td>9.0%</td> </tr> <tr> <td>Reconnection Fees</td> <td>8.6%</td> <td>5.1%</td> </tr> </tbody> </table>				YEAR		Customer Type	Fee Type	2018	2019	Residential	Disconnection Visit Fees	8.8%	9.0%	Reconnection Fees	8.6%	5.1%
		YEAR														
Customer Type	Fee Type	2018	2019													
Residential	Disconnection Visit Fees	8.8%	9.0%													
	Reconnection Fees	8.6%	5.1%													
5b.	<p>The data below represents the percentage of customers who hit PSE's disconnect queue in 2018 and 2019 and also received energy assistance (LIHEAP, PSE HELP, and/or Salvation Army) in 2018 and/or 2019. Please note, the denominator used for this question represents any customer who reached PSE's disconnect queue, i.e. this is any customer who was eligible for disconnect. It does not mean they all would actually have been disconnected.</p> <table border="1"> <thead> <tr> <th></th> <th colspan="2">YEAR</th> </tr> <tr> <th>Customer Type</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>8.1%</td> <td>7.7%</td> </tr> </tbody> </table>		YEAR		Customer Type	2018	2019	Residential	8.1%	7.7%						
	YEAR															
Customer Type	2018	2019														
Residential	8.1%	7.7%														

6. Please identify barriers you have encountered to payment for low-income customers, members of highly impacted communities, and/or vulnerable populations. For the companies, what steps has your company taken to address identified barriers, if any? Please describe the results of these steps and provide any data you have relied upon for this analysis.

Question	Summary of Comments
<i>Avista</i>	
6.	<p>Prior to the passage of the Clean Energy Transformation Act (CETA) in 2019, the terms “highly impacted communities” and/or “vulnerable populations” were not commonplace with regards to how Avista sought to identify particular customer segments. Before the enactment of CETA and the commissioning of a third-party contractor, Evergreen Economics, in 2019 to conduct an evaluation of need amongst its residential customers, Avista had historically relied upon its local Community Action Agencies (CAAs), in addition to customer call experiences, to provide its understanding of the hardships—financial or otherwise—that customers with limited resources were struggling with. While the Company cannot speculate the reasons customers may be unable to pay their utility bills or the barriers each individual or population may encounter when paying their bills, anecdotally, the Company recognizes that barriers such as language, transportation (or lack thereof), and income amount or frequency of receipt of income may all be contributing factors. Additionally, the knowledge that fixed incomes for seniors and those living with disabilities are continuously eroded by increased costs of living, and that there are a significant number of customers within Avista’s service territory whose constrained incomes put them in a position of chronic assistance need, as evidenced by the United Way’s biennial ALICE (Asset Limited, Income Constrained, Employed) Report, is integral. Such reports, as well as census data showing the rate of poverty in the Company’s service area, have helped Avista to identify the proportion of customers for whom bill assistance is essential for easing energy burden and to gain understanding that for a considerable number of employed Avista customers, the incomes provided are simply not enough to cover the basic costs of living.</p> <p>For our part, to combat these barriers, Avista continuously aspires to “meet customers where they are” through a multitude of outreach programs, bill/payment options, and customer services. Avista outreach, for example, strives to connect with customers through a variety of methods such as workshops, energy fairs, mobile outreach, and community partnerships. These activities result in connecting with an average of 10,000 individuals each year and equipping them with</p>

Question	Summary of Comments
	<p>information and resources to manage energy costs (effectively and safely) as well as details about bill assistance programs. The Company, in collaboration with partner CAAs, has also hosted Energy Assistance Days that allow customers to apply for assistance, obtain energy saving kits and learn about community service programs and organizations. Additionally, Avista has partnered with its largest CAA partner, Spokane Neighborhood Action Partners (SNAP), to have CAA representatives in the lobby of the Company’s corporate office to process assistance applications for those with past due notices or expressed hardship.</p> <p>To support customers in managing their financial resources, Avista has a variety of payment and billing options that include multiple avenues to pay—in-person, online, via text or telephone call, drop boxes, or pay stations—along with billing options such as preferred due dates, Comfort Level Billing (CLB) and flexible payment arrangements. Customer Service Representatives are encouraged to start each payment arrangement conversation with a question that invites the customer to manage their own arrangement, thereby emboldening the customer to set a pay plan that is more likely to work for their specific situation rather than agreeing to an Avista-prescribed arrangement. CSRs are also empowered to “Feel Free to Fix It” in instances where customers require help that may be outside of what a “typical” guideline might permit. To support this personalized approach, customers can sign up for budget alerts that can be set to their desired affordability threshold. The Company also has a group of Customer Assistance Referral & Evaluation Services (CARES) representatives available to provide specialized consult to customers experiencing hardships such as medical crisis, unemployment, family emergency, seniors, life support customers, or other situations warranting referral to additional resources. Furthermore, translations services are available to customers for whom English is not their primary language.</p>
Cascade	
6.	<p>Barriers to providing assistance to low-income customers include language obstacles and customer engagement. To address these barriers, in 2021 Cascade Natural Gas added translation features to the company website that allows any page, including energy assistance pages, to be translated to the eight most prevalent languages in Washington state. Cascade Natural Gas also includes Spanish text in all energy assistance outreach materials. In 2021 CNGC also partnered with Language Line to provide interpreter services for up to 240 different languages. The company’s Customer Service Representatives are able to utilize this service while interacting with any customer who speaks any of the 240 languages interpreted through the Language Line service. Paid social media, Google Ads, radio, and event sponsorships have raised awareness among customers of the assistance options available to them both through Cascade Natural Gas directly, and through our Community Action partners. As a result of these efforts, the number of Cascade Natural Gas customers past due have decreased by ~32% since 2019.</p> <p>In response to the COVID-19 pandemic, we created three instant grant programs for our customers experiencing difficulty paying their bill. These grants are an important and drastic change in how we have served low-income customers historically. These programs removed the barriers and burdens customers encountered when working with Community Action agencies in the past which included providing extensive documentation, attempting to secure one of the limited number of appointments that are available each month, having to go to an agency in person, the difficulty of reaching a staff member by phone, and relying on them to offer all of the grant opportunities for which a customer may qualify. The instant grants immediately improved the process for customers who endure financial stress daily while providing the company direct opportunities to build trust and improve communication with the group within our customer base who would likely benefit most. As a result, customers will be more likely to contact us in the future when they are experiencing financial difficulty because their experience has become positive instead of fearful; we know this is true given the number of repeat instant grant requests for the programs we have offered. Working with a third party can be very beneficial, and we</p>

	<p>encourage our customers to do so, but it may also add barriers that discourage customers from applying for financial aid. The option for and relief of an instant grant has been significant for our customers.</p>
<p><i>NW Natural</i></p>	
<p>6.</p>	<p>In compliance with the Commission’s approval of the development of the Company’s low-income needs assessment (LINA) in Order 05 in docket UG-200994, NW Natural is in the process of conducting the LINA with the third-party contractor Applied Economics Group. The LINA will be completed in the summer of 2022. NW Natural intends that the LINA will provide insight about barriers low-income customers face with regard to participating in energy assistance and energy efficiency programs, characteristics of historically underserved communities, as well as household demographic data, including but not necessarily limited to age, language, race, cultural identification, employment status, presence of disabilities. We will share the LINA with our stakeholders when it is complete so that we can better tailor our programs to the communities we serve.</p>
<p><i>PacifiCorp</i></p>	
<p>6.</p>	<p>PacifiCorp has not identified specific barriers to payment for low-income customers and members of highly impacted communities, and/or vulnerable populations. However, as identified in Chapter 5 of its December 30, 2021 Clean Energy Implementation Plan, PacifiCorp has identified the following potential barriers to participating in utility programs that customers may experience (page 110-112), which may also affect payments.</p> <ul style="list-style-type: none"> ○ Lack of access to digital channels ○ Language considerations ○ Cultural considerations <p>With regards to payment options, PacifiCorp offers multiple ways for customers to submit payment, including several free and convenient payment options. Customers have the following payment options:</p> <p>Auto-Pay Set up automatic payments and receive a \$1.00 credit Allows specific timing of payment</p> <p>Online Pay Enter bank account information (no fee) Use credit or debit card (no fee)</p> <p>Mobile Application Enter bank account information (no fee) Use credit or debit card (no fee)</p> <p>Pay by Phone Check, credit card, or debit card payments</p> <p>Text to Pay Enter bank account information (no fee)</p> <p>Pay station Free pay station locates conveniently located – payments post within an hour from our automated pay station locations</p>

	<p>Postal Service Mail a payment Additionally, PacifiCorp is focusing attention on providing Spanish translation of materials, an objective that is consistent with the Company’s current approach in Washington. Translation services are available to our customers at all times through our Customer Care Department. PacifiCorp does not have access to data to assess how these multiple payment options have affected payments from customers.</p>
PSE	
6.	<p>PSE has not collected any data at this time that would identify barriers to payment for low-income customers, members of highly impacted communities, and/or vulnerable populations. PSE also employs email marketing campaigns messaging on the company website and app, in-language videos on social media, and digital banner ads that target audiences by zip code to ensure customers are informed about access to assistance. Additionally, PSE can segment messages by a variety of languages, including Spanish. To ensure PSE is reaching “in need” communities, PSE engages with community non-profits throughout its service territory to communicate energy assistance information to their clients, targeting areas with the highest concentration of income qualified and language challenged customers. PSE provides written communications to these agencies in English, Spanish, Hindi, Mandarin, and Vietnamese to distribute to their clients who may need assistance.</p>
Public Counsel	
6.	<p>Notice Question 6 asks about barriers to payment for low-income customers, members of highly-impacted communities, and vulnerable populations. Public Counsel will review the utilities’ answers for whether customers have adequate access to customer service representatives who can take payment, whether utilities have adequate processes to allow unbanked customers to pay, and whether utilities are identifying and addressing language and access barriers.</p>
TEP	
6.	<p>Question 6 asks for identification of barriers to payment for low-income customers, members of highly impacted communities, and/or vulnerable populations. We identify several specific following barriers below; please note that these comments discuss many of these topics in more detail elsewhere.</p> <ul style="list-style-type: none"> • Language barriers. Disconnection notices, utility bills, and other important information from the utility may not be in the customer’s native language. • Fees, including reconnection, disconnection, field visit and late fees represent a major barrier to payment of utility bills and arrearages as they create further financial hardship and larger arrearages to customers already struggling to pay their bills. • Payment locations and payment options, including for unbanked customers. • Lack of access to reasonable credit. • Medical issues or emergencies. • Deposit requirements for some customers may be onerous, making subsequent utility bill payments more difficult. • Availability of low-income energy assistance. • As discussed throughout these comments and in research literature on this topic, vulnerable populations often face barriers to maintaining affordable utility service including low-income customers, BIPOC customers, elderly customers, households with children or individuals with disabilities. <p>This list is certainly not exhaustive. We look forward to continuing research on this issue and reviewing the comments of other stakeholders on this topic.</p>

Deposits

7. Does your company currently collect deposits from residential customers?

a. If so, please identify all references in your tariff governing residential customer deposits.

Question	Summary of Comments
Avista	
7.	<i>Response is provided below in subsection 7a.</i>
7a.	Pursuant to Order 01 in Docket U-200281, the Company is not currently collecting deposits from its residential customers. Prior to this order, during standard business procedures, Avista did collect deposits from its residential customers who: 1) have been disconnected for non-payment within the previous 12 months; or, 2) have a balance owed to Avista that has been turned over to a collection agency. Please see Avista’s respective “Rules and Regulations” tariffs—Schedule 70 for electric and Schedule 170 for natural gas—for further information. Deposit information can be found in Schedule 70F, Sections 12-15, and Schedule 170-G, Sections 14-17.
Cascade	
7.	<i>Response is provided below in subsection 7a.</i>
7a.	Rule 4, Customer Deposits and Other Security, contains the information on deposits for residential customers.
NW Natural	
7.	Yes. The processes for deposits are provided in Rule 2 Establishment of Credit and Rule 3 Deposits of NW Natural’s tariff.
7a.	Please see NW Natural Washington Tariff – Rule 2 here or included as Attachment 3. Please see NW Natural Washington Tariff – Rule 3 here or included as Attachment 4.
PacifiCorp	
7.	<i>Response is provided below in subsection 7a.</i>
7a.	PacifiCorp collects deposits from residential customers. PacifiCorp’s Rule 9 contains the rules and regulations for residential applicant and customer deposits.
PSE	
7.	<i>Response is provided below in subsection 7a.</i>
7a.	Electric Tariff G (WN U-60): Schedule 80 Section 16 Deposits (Sheet No. 80-n) Natural Gas Tariff (WN U-2): Rule No. 5: Deposits

8. Please provide the following information regarding the residential customer deposits collected by your company in 2018 and 2019, respectively:

a. Please provide the total dollar amount collected for residential customer deposits each year.

b. How many customer accounts paid deposits each year?

c. What percentage of retail revenue did your company derive from residential customer deposits each year?

d. How many customers used part or all their deposit to offset account balances?

e. What percentage of customers who used part or all their deposit to pay for account balances each year requested reconnection within 12-months of disconnection?

Question	Summary of Comments
Avista	
8.	<i>Responses are provided below in subsections 8a – 8e.</i>
8a.	The table below provides the total amount of residential deposits collected in 2018 and 2019.

Question	Summary of Comments				
	Year	Amount Collected			
	2018	\$1,351,377.81			
	2019	\$1,471,228.10			
8b.	The table below provides the total number of residential customers who paid deposits in 2018 and 2019.				
	Year	Total Customers			
	2018	7,719			
	2019	8,735			
8c.	The Company does not include deposits as retail revenue; deposits collected from customers are considered the customer's money and are simply held until returned to the customer or applied to their account balance.				
8d.	The table below provides the total number of customers using all or part of their deposit to pay for balances owed on their account. Deposits can be applied towards a customer's account balance 1) at the time of a disconnect for non-payment, 2) when the account closes with a balance owing, or 3) once the customer reaches 12 months (consecutively) of on-time payments.				
	Year	Disconnected	Account Closed	Good Pay History	Total
	2018	2,804	1,023	7,743	11,570
	2019	3,856	1,845	7,469	13,170
8e.	The table below provides the percent of customers who used part or all of their deposit to offset an account balance owed, then subsequently requested reconnection within 12-months of disconnection.				
	Year	% of Customers			
	2018	24%			
	2019	29%			
Cascade					
8.	<i>Responses are provided below in subsections 8a – 8e.</i>				
8a.	2018 - \$454,435.13 2019 - \$410,162.10				
8b.	2018 – 5,842 2019 – 5,392				
8c.	2018 – .202% 2019 – .166%				
8d.	2018 – 5,354 2019 – 5,259				
8e.	2018 – 26.93% 2019 – 21.41%				
NW Natural					
8.	<i>Responses are provided below in subsections 8a – 8e.</i>				
8a.	Residential customer deposits paid in 2018 and 2019 were \$161,229 and \$146,316, respectively				
8b.	The number of residential customer deposits in 2018 and 2019 were 1,799 and 1,705, respectively.				
8c.	Customer deposits do not represent revenue; they are booked as regulatory liabilities and held, with interest, until customers can satisfy credit requirements. When a customer's account closes or has satisfied credit requirements, the deposit is returned, with interest, onto the customer's account. This deposit return would be booked as a reduction to the customer's accounts receivable and would have no revenue impact to the Company.				

8d.	<p>Customer deposits do not represent revenue; they are booked as regulatory liabilities and held, with interest, until customers can satisfy credit requirements. When a customer’s account closes or has satisfied credit requirements, the deposit is returned, with interest, onto the customer’s account. This deposit return would be booked as a reduction to the customer’s accounts receivable and would have no revenue impact to the Company.</p> <table border="1" data-bbox="354 401 1230 548"> <thead> <tr> <th>Refund Year</th> <th>Distinct Customers</th> <th>Distinct Accounts</th> <th>Distinct Refunds</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>1,603</td> <td>1,671</td> <td>1,689</td> </tr> <tr> <td>2019</td> <td>1,583</td> <td>1,655</td> <td>1,678</td> </tr> </tbody> </table>	Refund Year	Distinct Customers	Distinct Accounts	Distinct Refunds	2018	1,603	1,671	1,689	2019	1,583	1,655	1,678						
Refund Year	Distinct Customers	Distinct Accounts	Distinct Refunds																
2018	1,603	1,671	1,689																
2019	1,583	1,655	1,678																
8e.	<p>As mentioned above, prior to the COVID-19 pandemic, deposits were not used to offset active customer account balances. When a customer’s account closes or has satisfied credit requirements, the deposit is returned, with interest, onto the customer’s account. The following table summarizes our best estimate of the count of Washington residential customers that experienced a deposit refund later followed by a disconnection and completion of at least one reconnection within a year of the initial disconnection.</p> <table border="1" data-bbox="354 741 1247 898"> <thead> <tr> <th>Year or Refund</th> <th>Disconnected Customers</th> <th>Reconnect <=365 Days</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>169</td> <td>134</td> <td>79.3%</td> </tr> <tr> <td>2019</td> <td>83</td> <td>69</td> <td>83.1%</td> </tr> </tbody> </table>	Year or Refund	Disconnected Customers	Reconnect <=365 Days	Percentage	2018	169	134	79.3%	2019	83	69	83.1%						
Year or Refund	Disconnected Customers	Reconnect <=365 Days	Percentage																
2018	169	134	79.3%																
2019	83	69	83.1%																
PacifiCorp																			
8.	<i>Responses are provided below in subsections 8a – 8e.</i>																		
8a.	<table border="1" data-bbox="354 968 1258 1220"> <thead> <tr> <th>Category</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>(a) Deposits Charged</td> <td>\$2,132,163</td> <td>\$1,818,145</td> </tr> <tr> <td>(b) Customers Charged</td> <td>11,067</td> <td>10,065</td> </tr> <tr> <td>(c) % Retail Revenue</td> <td>0.69%</td> <td>0.59%</td> </tr> <tr> <td>(d) Offset</td> <td>4,751</td> <td>3,752</td> </tr> <tr> <td>(e) % Recommended</td> <td colspan="2">12.21%</td> </tr> </tbody> </table>	Category	2018	2019	(a) Deposits Charged	\$2,132,163	\$1,818,145	(b) Customers Charged	11,067	10,065	(c) % Retail Revenue	0.69%	0.59%	(d) Offset	4,751	3,752	(e) % Recommended	12.21%	
Category	2018	2019																	
(a) Deposits Charged	\$2,132,163	\$1,818,145																	
(b) Customers Charged	11,067	10,065																	
(c) % Retail Revenue	0.69%	0.59%																	
(d) Offset	4,751	3,752																	
(e) % Recommended	12.21%																		
8b.	<i>See above table for response to 8b.</i>																		
8c.	<i>See above table for response to 8c.</i>																		
8d.	<i>See above table for response to 8d.</i>																		
8e.	<i>See above table for response to 8e.</i>																		
PSE																			
8.	<i>Responses are provided below in subsections 8a – 8e.</i>																		
8a.	<p>PSE’s response reflects the dollars collected for residential security deposits that started in the year 2018 or 2019 and collected in any year. Deposits that started outside of 2018 or 2019, but had dollars collected in 2018 and 2019, are not shown in the counts below. For example, a customer’s security deposit started in December 2017, but they made the payment in January 2018. Additionally, this does not include dollars that were requested on security deposits but were not paid. This is only dollars that were requested as part of a security deposit and paid.</p> <table border="1" data-bbox="354 1640 1421 1755"> <thead> <tr> <th rowspan="2">CUSTOMER TYPE</th> <th colspan="2">TOTAL \$ COLLECTED</th> </tr> <tr> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>\$ 27,905,477</td> <td>\$ 10,319,106</td> </tr> </tbody> </table>	CUSTOMER TYPE	TOTAL \$ COLLECTED		2018	2019	Residential	\$ 27,905,477	\$ 10,319,106										
CUSTOMER TYPE	TOTAL \$ COLLECTED																		
	2018	2019																	
Residential	\$ 27,905,477	\$ 10,319,106																	

8b.	<p>PSE’s response reflects customers who had security deposits that began in the year 2018 or 2019 with payment amounts > \$0 on their requested security deposit. Customers who did not pay any of the requested security deposit are not reflected in numbers below.</p> <table border="1" data-bbox="357 346 1412 462"> <thead> <tr> <th colspan="3"># CUSTOMERS</th> </tr> <tr> <th>CUSTOMER TYPE</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>149,182</td> <td>62,319</td> </tr> </tbody> </table>	# CUSTOMERS			CUSTOMER TYPE	2018	2019	Residential	149,182	62,319
# CUSTOMERS										
CUSTOMER TYPE	2018	2019								
Residential	149,182	62,319								
8c.	<p>Customer security deposits are not considered "retail revenue" as they are held by the company and then returned to the customer and/or applied to a customer's invoice as applicable.</p>									
8d.	<p>PSE cannot tell if the security deposit was returned to the customer or credited against an account. Both types of transactions can show up as "returned" as the funds were returned either via credit to the customer or credit to the account and cleared against an invoice.</p> <table border="1" data-bbox="357 651 1412 766"> <thead> <tr> <th colspan="3"># CUSTOMERS</th> </tr> <tr> <th>CUSTOMER TYPE</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>105,757</td> <td>102,932</td> </tr> </tbody> </table>	# CUSTOMERS			CUSTOMER TYPE	2018	2019	Residential	105,757	102,932
# CUSTOMERS										
CUSTOMER TYPE	2018	2019								
Residential	105,757	102,932								
8e.	<p>PSE is interpreting this question as the following equation⁴: (Disconnection, deposit applied towards balance, customer requests reconnect within 12 months) / ((deposit applied towards balance)</p> <p>It is important to note that, in PSE’s system, customers counted in the condition “deposit applied toward balance” may include some customers who requested that the balance be directly returned to themselves rather than applied to the account.</p> <table border="1" data-bbox="357 1050 1396 1186"> <thead> <tr> <th colspan="3">% CUSTOMERS</th> </tr> <tr> <th>CUSTOMER TYPE</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>28%</td> <td>22%</td> </tr> </tbody> </table>	% CUSTOMERS			CUSTOMER TYPE	2018	2019	Residential	28%	22%
% CUSTOMERS										
CUSTOMER TYPE	2018	2019								
Residential	28%	22%								

9. Please provide the following information regarding deposits among low-income customers in 2018 and 2019, respectively:

a. What percentage of customers who paid deposits were low-income customers?

b. If possible, please identify the percentage of customers who paid deposits who are members of a highly impacted community or vulnerable population.

Question	Summary of Comments												
<i>Avista</i>													
9.	<i>Responses are provided below in subsections 9a – 9b.</i>												
9a.	<p>As depicted in the chart below, 31% of customers who paid deposits in 2018 were also classified as low-income customers pursuant to the definition of “low-income” provided in the Notice, while 28% were classified as low-income in 2019.</p> <table border="1" data-bbox="341 1627 1315 1732"> <thead> <tr> <th>YEAR</th> <th>Low-Income</th> <th>All Customers</th> <th>% Low-Income</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>2,392</td> <td>7,719</td> <td>31%</td> </tr> <tr> <td>2019</td> <td>2,420</td> <td>8,735</td> <td>28%</td> </tr> </tbody> </table>	YEAR	Low-Income	All Customers	% Low-Income	2018	2,392	7,719	31%	2019	2,420	8,735	28%
YEAR	Low-Income	All Customers	% Low-Income										
2018	2,392	7,719	31%										
2019	2,420	8,735	28%										

⁴ PSE updated this response with revised methodology through follow up communication with staff.

Question	Summary of Comments												
9b.	<p>As noted in Avista’s response to Question 6 above, the Company did not identify or track customers as members of a “highly impacted community” or “vulnerable population” (jointly referred to as a “Named Community”) during the 2018 and 2019 calendar years. Utilizing current census tract data, however, Avista has determined that 57% of all customers who were assessed a deposit in 2018 were located in a Named Community. In 2019, 59% of customers receiving a deposit were located within a Named Community.</p> <table border="1"> <thead> <tr> <th>YEAR</th> <th>All Customer Deposits</th> <th>Named Community Customer Deposits</th> <th>% of Deposits Collected from Customers in Named Communities</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>7,719</td> <td>4,401</td> <td>57%</td> </tr> <tr> <td>2019</td> <td>8,735</td> <td>5,150</td> <td>59%</td> </tr> </tbody> </table>	YEAR	All Customer Deposits	Named Community Customer Deposits	% of Deposits Collected from Customers in Named Communities	2018	7,719	4,401	57%	2019	8,735	5,150	59%
YEAR	All Customer Deposits	Named Community Customer Deposits	% of Deposits Collected from Customers in Named Communities										
2018	7,719	4,401	57%										
2019	8,735	5,150	59%										
Cascade													
9.	<i>Responses are provided below in subsections 9a – 9b.</i>												
9a.	2018 - 0.50% 2019 - 0.37%												
9b.	2018 - 0.013% 2019 - 0.009%												
NW Natural													
9.	<i>Responses are provided below in subsections 9a – 9b.</i>												
9a.	The percentage of customers who paid deposits in 2018 and 2019 that were low-income customers is 5.06% and 3.13%, respectively. Note – low income is defined as any energy assistance received by the customer during calendar years 2018 or 2019.												
9b.	NW Natural does not have information regarding highly impacted communities or vulnerable populations.												
PacifiCorp													
9.	<i>Responses are provided below in subsections 9a – 9b.</i>												
9a.	<table border="1"> <thead> <tr> <th>Category</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>(a) Customers Charged</td> <td>609</td> <td>541</td> </tr> <tr> <td>(b) %</td> <td>5.5%</td> <td>5.4%</td> </tr> </tbody> </table> <p>* Note: PacifiCorp generally does not collect demographic information for classifying highly impacted communities and vulnerable populations as part of the day-to-day operations.</p>	Category	2018	2019	(a) Customers Charged	609	541	(b) %	5.5%	5.4%			
Category	2018	2019											
(a) Customers Charged	609	541											
(b) %	5.5%	5.4%											
9b.	<i>See above table for response to 9b.</i>												
PSE													
9.	<i>Responses are provided below in subsections 9a – 9b.</i>												
9a.	<p>Low-income is defined as anyone who received PSE HELP, LIHEAP, or Salvation Army pledge assistance during the calendar years 2018 and 2019. The timeframe is determined by the clearing date of the pledge (i.e., when it cleared the customer's account).</p> <table border="1"> <thead> <tr> <th rowspan="2">CUSTOMER TYPE</th> <th colspan="2">% OF LATE FEES CHARGED TO LOW-INCOME CUSTOMERS</th> </tr> <tr> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>8.5%</td> <td>3.5%</td> </tr> </tbody> </table>	CUSTOMER TYPE	% OF LATE FEES CHARGED TO LOW-INCOME CUSTOMERS		2018	2019	Residential	8.5%	3.5%				
CUSTOMER TYPE	% OF LATE FEES CHARGED TO LOW-INCOME CUSTOMERS												
	2018	2019											
Residential	8.5%	3.5%											

Question	Summary of Comments																		
9b.	<p>The data used for vulnerable populations and highly impacted communities is reflective of 2021, American Community Survey (ACS), which is made up of 5 years' worth of data, PSE believes using this data against 2018 and 2019 historical years is an accurate reflection of vulnerable populations and highly impacted communities at that time. PSE was unable to match roughly 1.4% of customers who were charged late fees in 2018 and 2019 to the vulnerable population data. PSE was unable to match roughly 1.4% of customers who were charged late fees in 2018 and 2019 to highly impacted communities data. Please note that a customer could be a member of a highly impacted community and live in an area with a high concentration of vulnerable populations. Therefore, the numbers represented below are not additive.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="3">% OF CUSTOMERS CHARGED LATE FEES WHO LIVE IN AN AREA WITH HIGH CONCENTRATION OF VULNERABLE POPULATIONS</th> </tr> <tr> <th>CUSTOMER TYPE</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>50.4%</td> <td>54.6%</td> </tr> </tbody> </table> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="3">% OF CUSTOMERS CHARGED LATE FEES WHO LIVE IN A HIGHLY IMPACTED COMMUNITY</th> </tr> <tr> <th>CUSTOMER TYPE</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>34.3%</td> <td>36.2%</td> </tr> </tbody> </table>	% OF CUSTOMERS CHARGED LATE FEES WHO LIVE IN AN AREA WITH HIGH CONCENTRATION OF VULNERABLE POPULATIONS			CUSTOMER TYPE	2018	2019	Residential	50.4%	54.6%	% OF CUSTOMERS CHARGED LATE FEES WHO LIVE IN A HIGHLY IMPACTED COMMUNITY			CUSTOMER TYPE	2018	2019	Residential	34.3%	36.2%
% OF CUSTOMERS CHARGED LATE FEES WHO LIVE IN AN AREA WITH HIGH CONCENTRATION OF VULNERABLE POPULATIONS																			
CUSTOMER TYPE	2018	2019																	
Residential	50.4%	54.6%																	
% OF CUSTOMERS CHARGED LATE FEES WHO LIVE IN A HIGHLY IMPACTED COMMUNITY																			
CUSTOMER TYPE	2018	2019																	
Residential	34.3%	36.2%																	

Late fees

10. Does your company's tariff currently include a late fee for residential customers?
 a. If so, please identify all the appropriate tariff references.

Question	Summary of Comments
Avista	
10.	<i>Response is provided below in subsection 10a.</i>
10a.	Avista does not charge late fees within its Washington service territory; as such, the Company does not have any tariffs that include a late fee for its residential customers.
Cascade	
10.	<i>Response is provided below in subsection 10a.</i>
10a.	Schedule 200, Miscellaneous Charges, and Rule 6, Billings and Payments, contain information on Cascade's late fees for residential customers.
NW Natural	
10.	Yes. Late Fees are described in Schedule C Miscellaneous Charges (see Sheet C.1 and Sheet C.2).
10a.	Please see NW Natural Washington Tariff – Schedule C here or included as Attachment 2.
PacifiCorp	
10.	PacifiCorp's tariff includes a late fee for residential customers. Rule 10, H. provides the context in which a customer would be assessed a late payment charge and Schedule 300 provides detail on the late payment charge.
10a.	<i>Response is provided above in question 10.</i>
PSE	

10.	<i>Response is provided below in subsection 10a.</i>
10a.	Electric Tariff G (WN U-60): Schedule 80, Section 31 Late Payment Fee (Sheet No. 80-Z.1) Natural Gas Tariff (WN U-2): Rule No. 9, Section 9 Late Payment Fee (Sheet No. 21-C)

11. Please provide the following information regarding the late fees your company collected in 2018 and 2019, respectively:

- a. Please provide the total dollar amount collected in late fees for each year.
- b. How many residential customer accounts paid late fees each year?
- c. What percentage of retail revenue did your company derive from residential late fees each year?
- d. If late fees were no longer collected and were to be recovered in base rates instead, how much would residential bill increase based on your current approved rate spread? Please provide both a percentage increase and an average residential customer bill increase amount.

Question	Summary of Comments
Avista	
11.	Since the Company does not charge late fees in Washington, all questions relating to late fees in this Notice are not applicable to Avista.
11a.	N/A
11b.	N/A
11c.	N/A
11d.	N/A
Cascade	
11.	<i>Responses are provided below in subsections 11a – 11d.</i>
11a.	2018 - \$325,172.48 2019 - \$322,146.63
11b.	2018 – 86,442 2019 – 84,102
11c.	2018 – 0.145% 2019 – 0.130%
11d.	Cascade’s last approved rate spread was an equal percentage to all customer classes; thus, the percentages reflected in part (c) would be the percentage increase to all customer classes. Using the current average residential bill of \$54.08, the average increase amount would be the following: a. 2018 - \$0.0783 per month per residential customer b. 2019 - \$0.0704 per month per residential customer
NW Natural	
11.	<i>Responses are provided below in subsections 11a – 11d.</i>

11a.	2018	Fees (Count)	Fees (Dollars)
	Residential	50,487	\$58,086
	Commercial	7,168	\$24,766
	Industrial	124	\$5,887
	Total	57,779	\$88,739
	2019	Fees (Count)	Fees (Dollars)
	Residential	51,580	\$60,100
	Commercial	7,589	\$25,329
	Industrial	127	\$5,051
	Total	59,296	\$90,480
	Grand Total	117,075	\$179,219
11b.	<i>See above table for response to 11b.</i>		
11c.	The Company derived 0.14% and 0.13% of retail revenue from late fees for the years 2018 and 2019, respectively.		
11d.	Using the 2019 late fees and the Company’s most current compliance filing in UG-200994, a residential bill would increase \$0.07, or 0.10%.		
PacifiCorp			
11.	<i>Responses are provided below in subsections 11a – 11d.</i>		
11a.	Category	2018	2019
	(a) Late Payment Fees	\$484,451	\$502,078
	(b) Average Agreements Charged	25,131	25,149
	(c) % Retail Revenue	0.16%	0.16%
11b.	<i>See above table for response to 11b.</i>		
11c.	<i>See above table for response to 11c.</i>		
11d.	Did not answer - Due to its potential to increase other costs, such as net write-off expense, the Company is unable to quantify the effect of this tariff change on residential bills.		
PSE			
11.	<i>Responses are provided below in subsections 11a – 11d.</i>		
11a.		Dollar Amount Collected in Late Fees	
	Customer Type	2018	2019
	Residential	\$1,859,432	\$1,655,745
11b.		# Residential Customer Accounts Who Paid Late Fees	
	Customer Type	2018	2019
	Residential	519,465	501,745
11c.		% of Retail Revenue From Late Fees	
	Customer Type	2018	2019
	Residential	0.056%	0.049%

11d.	Residential bill impacts were calculated using 900kWh for electric residential customers and 64 therms for residential gas customers. Residential bill impacts were calculated using 2018 data.		
	Average Bill		
	Customer Type	Bill Increase Percentage	Bill Increase Amount
	Electric Residential	0.12%	\$0.12
Gas Residential	0.09%	\$0.06	

12. Please provide the following information regarding late fees affecting low-income customers in 2018 and 2019, respectively:

a. What percentage of late fees were charged to low-income customers each year?

b. If possible, please identify the percent of customers charged late fees in each year who were members of a highly impacted community or vulnerable populations.

Question	Summary of Comments															
Avista																
12.	Since the Company does not charge late fees in Washington, all questions relating to late fees in this Notice are not applicable to Avista.															
12a.	N/A															
12b.	N/A															
Cascade																
12.	<i>Responses are provided below in subsections 12a – 12b.</i>															
12a.	2018 – 1.291% 2019 – 1.339%															
12b.	2018 – 0.512% 2019 – 0.508% CNGC does not track income information of its customers. We identified low-income customers, or vulnerable populations, as customers who received any type of energy assistance during the calendar year (LIHEAP, WEAFF, Winter Help, etc.).															
NW Natural																
12.	<i>Responses are provided below in subsections 12a – 12b.</i>															
12a.	The percentage of total late fees charged to low-income customers in 2018 and 2019 was 1.65% and 1.49%, respectively. Note – low income is defined as any energy assistance received by the customer during calendar years 2018 or 2019.															
12b.	NW Natural does not have information regarding highly impacted communities or vulnerable populations.															
PacifiCorp																
12.	Please see table provided below. Amount reflects late fees charged. Low-income customers are defined as customers who had received energy assistance payments. Counts represent average number of customer agreements. All low-income customers are considered as being part of a highly impacted community.															
12a.	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Category</th> <th style="text-align: center;">2018</th> <th style="text-align: center;">%</th> <th style="text-align: center;">2019</th> <th style="text-align: center;">%</th> </tr> </thead> <tbody> <tr> <td>Late Payment Fees</td> <td style="text-align: right;">\$44,211</td> <td style="text-align: center;">9.1%</td> <td style="text-align: right;">\$46,939</td> <td style="text-align: center;">9.3%</td> </tr> <tr> <td>Average Agreements Charged</td> <td style="text-align: right;">1,867</td> <td style="background-color: black;"></td> <td style="text-align: right;">1,881</td> <td style="background-color: black;"></td> </tr> </tbody> </table>	Category	2018	%	2019	%	Late Payment Fees	\$44,211	9.1%	\$46,939	9.3%	Average Agreements Charged	1,867		1,881	
Category	2018	%	2019	%												
Late Payment Fees	\$44,211	9.1%	\$46,939	9.3%												
Average Agreements Charged	1,867		1,881													
12b.	<i>See above table for response to 12b.</i>															
PSE																
12.	<i>Responses are provided below in subsections 12a – 12b.</i>															

Question	Summary of Comments																		
12a.	<p>Low-income is defined anyone who received PSE HELP, LIHEAP, or Salvation Army pledge assistance during the calendar years 2018 and 2019. The timeframe is determined by the clearing date of the pledge (i.e. when it cleared the customer's account).</p> <table border="1"> <thead> <tr> <th colspan="3">% of Late Fees Charged to Low-Income Customers</th> </tr> <tr> <th>Customer Type</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>12.4%</td> <td>12.7%</td> </tr> </tbody> </table>	% of Late Fees Charged to Low-Income Customers			Customer Type	2018	2019	Residential	12.4%	12.7%									
% of Late Fees Charged to Low-Income Customers																			
Customer Type	2018	2019																	
Residential	12.4%	12.7%																	
12b.	<p>The data used for vulnerable populations and highly impacted communities is reflective of 2021, American Community Survey (ACS), which is made up of 5 years' worth of data, PSE believes using this data against 2018 and 2019 historical years is an accurate reflection of vulnerable populations and highly impacted communities at that time. PSE was unable to match roughly 1.4% of customers who were charged late fees in 2018 and 2019 to the vulnerable population data. PSE was unable to match roughly 1.5% of customers who were charged late fees in 2018 and 2019 to highly impacted communities data. Please note that a customer could be a member of a highly impacted community and live in an area with a high concentration of vulnerable populations. Therefore, the numbers represented below are not additive.</p> <table border="1"> <thead> <tr> <th colspan="3">% of Customers Charged Late Fees Who Live In An Area With High Concentration of Vulnerable Populations</th> </tr> <tr> <th>Customer Type</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>41%</td> <td>41%</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">% of Customers Charged Late Fees Who Live In A Highly Impacted Community</th> </tr> <tr> <th>Customer Type</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>30%</td> <td>30%</td> </tr> </tbody> </table>	% of Customers Charged Late Fees Who Live In An Area With High Concentration of Vulnerable Populations			Customer Type	2018	2019	Residential	41%	41%	% of Customers Charged Late Fees Who Live In A Highly Impacted Community			Customer Type	2018	2019	Residential	30%	30%
% of Customers Charged Late Fees Who Live In An Area With High Concentration of Vulnerable Populations																			
Customer Type	2018	2019																	
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Customer Type	2018	2019																	
Residential	30%	30%																	

Credit and Collection

13. Please provide all references in your company's tariff, and citations to all applicable rules and regulations, governing the credit and collection processes used by your utility.

Question	Summary of Comments																		
<i>Avista</i>																			
13.	<p>All rules and regulations pertaining to credit and collections can be located in WAC 480-90 Part II – Consumer Rules for natural gas customers and WAC 480-100 Part II – Consumer Rules for electric customers.</p> <p>Please reference the following in Avista's electric tariff Schedule 70 – Rules and Regulations:</p> <table border="0"> <tr> <td>Sheet Name</td> <td>Section</td> </tr> <tr> <td>Second Revision Sheet 70-D</td> <td>10 – Refusal of Service</td> </tr> <tr> <td>Substitute Second Revision Sheet 70-F</td> <td>11 – Payments</td> </tr> <tr> <td>Substitute Second Revision Sheet 70-F</td> <td>12 – Establishment of Credit</td> </tr> <tr> <td>Second Revision Sheet 70-G</td> <td>13 – Deposits</td> </tr> <tr> <td>Substitute First Revision Sheet 70-I</td> <td>14 – Disconnection of Electric Service</td> </tr> <tr> <td>Substitute Second Revision Sheet 70-P</td> <td>15 – Reconnection of Electric Service</td> </tr> <tr> <td>Third Revision Sheet 70-Q</td> <td>16 – Miscellaneous Charges</td> </tr> <tr> <td>Third Revision Sheet 70-R</td> <td>17 – Personalized Billing Plans</td> </tr> </table> <p>Please reference the following in Avista's natural gas tariff Schedule 170 – Rules and Regulations:</p>	Sheet Name	Section	Second Revision Sheet 70-D	10 – Refusal of Service	Substitute Second Revision Sheet 70-F	11 – Payments	Substitute Second Revision Sheet 70-F	12 – Establishment of Credit	Second Revision Sheet 70-G	13 – Deposits	Substitute First Revision Sheet 70-I	14 – Disconnection of Electric Service	Substitute Second Revision Sheet 70-P	15 – Reconnection of Electric Service	Third Revision Sheet 70-Q	16 – Miscellaneous Charges	Third Revision Sheet 70-R	17 – Personalized Billing Plans
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Question	Summary of Comments
	<p>Third Revision Sheet 170-F 12 – Refusal of Service Substitute Fourth Revision Sheet 170-G 13 – Payments Substitute Fourth Revision Sheet 170-G 14 – Establishment of Credit Second Revision Sheet 170-H 15 – Deposits Third Revision Sheet 170-J 16 – Disconnection of Natural Gas Service Substitute Original Sheet 170-P 17 – Reconnection of Natural Gas Service First Revision Sheet 170-Q 18 – Miscellaneous Charges Original Sheet 170-R 19 – Personalized Billing Plans</p>
Cascade	
13.	<p>RULE 4 CUSTOMER DEPOSITS AND OTHER SECURITY ESTABLISHING CREDITWORTHINESS An applicant or customer may establish creditworthiness by either providing the information that demonstrates a deposit is not required or by paying a deposit or providing another acceptable form of security. DEPOSIT CRITERIA 1) RESIDENTIAL DEPOSIT CRITERIA a. deposit may be required if any of the following are true: i. The applicant is not able to demonstrate continuous employment during the prior twelve months and is neither currently employed nor has a regular source of income; ii. Another party in the dwelling owes a past due balance with the utility; iii. The applicant, customer or another party in the dwelling has previously tampered with, diverted or stolen utility service; iv. The customer or applicant has received three or more delinquency notices in the prior twelve months from the Company or another like-utility; or v. The applicant was previously a customer who has had his/her gas service disconnected for nonpayment from the Company or another like-utility.</p> <p>Procedure: • Currently Cascade Natural Gas does not require any residential deposits to start or reconnect service. Prior to the moratorium, new applicants who could not demonstrate continuous employment during the prior twelve months and was neither currently employed nor had a regular source of income were required to pay a deposit, with the option to pay in installments. • CNG Washington residential accounts that have been disconnected due to Non-Payment are classified as Prior Obligation. Prior to the moratorium, Prior Obligation accounts required a deposit upon reconnection based on 1/6 annual consumption at the Premise. 1/3 of the deposit was required to be paid prior to reconnection.</p> <p>RULE 5 DISCONNECTION AND RECONNECTION OF SERVICE DISCONNECTION OF SERVICE The Company may or shall discontinue service for any of the following reasons: d. For payment of a delinquent balance with a check that is dishonored by a bank or financial institution; or</p> <p>Procedure: When a payment is made to avoid disconnection and is later returned for non-sufficient funds (NSF): • If the customer received all required collection notices when payment cancelled the collection process, Credit agent will make a manual call to the customer to attempt to collect on the returned payment; otherwise, the account will enter into the Severance process.</p>

	<p>o The next business day, depending on resource availability, the Credit agent again reviews this account for payment. If no payment is received, a disconnect is scheduled for the next available business day based on field resource availability.</p> <ul style="list-style-type: none">• If the customer had not received all the required collection notices at the time the payment posted to the account, agent will make a manual call to the customer to attempt to collect on the returned payment. The system will automatically monitor the account and start the collection process if the account meets the debt criteria. The account is again evaluated for risk and necessary noticing is sent when applicable. <p>When a payment is made to reconnect service after non-pay disconnection and is later returned for non-sufficient funds (NSF):</p> <ul style="list-style-type: none">• Credit agent will make a manual call to the customer to attempt to collect on the NSF check; otherwise, the severance process is restarted based on previous notices and full NSF amount is due to reconnect. No paper or electronic checks are accepted to prevent disconnection. <p>e. For failure to stay current on an agreed upon payment plan.</p> <p>Procedure:</p> <p>The Credit department is not notified when a customer breaks a long-term Payment Arrangement. The system will evaluate the debt again for collection eligibility after the next bill. The System will notify the Credit department when a short-term Pay Plan breaks in the system. Credit agent will:</p> <ul style="list-style-type: none">• Review Account to see if Pay Plan cancelled a Collections or Severance process.• If customer received all required collection notices for the debt when the Pay Plan cancelled the high-risk collection process, agent will make a manual call to the customer to attempt to collect, or, if eligible, enter into another pay plan; otherwise, the severance process is restarted based on previous notices and disconnection is scheduled for no less than two days out, depending on field resource availability.• If the account was not in a high-risk collections process or in severance when entering into the Pay Plan, agent will make a manual call to the customer to attempt to collect or, if eligible, enter into another pay plan; otherwise, the system will automatically monitor the account and start the collection process if the account meets the debt criteria. The account is evaluated for risk and necessary noticing is sent when applicable. <p>NOTIFICATION OF DISCONNECTION OF SERVICE FOR NONPAYMENT</p> <p>Except as otherwise allowed per WAC 480-90-128(1) and (2), the Company will provide the customer with no less than two notices prior to involuntary disconnection for nonpayment. The first will be a mailed written notice with a stated disconnection date that is no less than eight business days after the date of mailing. The second notice will be mailed no less than five calendar days prior to the disconnection date.</p> <p>Advance notice of disconnection is not required when disconnection is for meter tampering, diverting service, other theft of service, or for hazardous or unsafe conditions.</p> <p>When a customer makes a payment subsequent to the issuance of a notice to disconnect service due to nonpayment, whether payment is made to prevent a disconnection of service or to reactivate service that was disconnected, and the payment is not honored by the bank or other financial institution, the account will be deemed unpaid. The Company will attempt to notify the customer in person, by telephone, or by written notice of the payment failure and the Customer will have one business day to correct the failure. If a valid payment is not received, service to the customer may be disconnected after the due date of the previously issued five-day notice and without further written notice. This process may proceed separately from the normal notice process described herein.</p> <p>Procedure:</p>
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	<p>Residential accounts meeting the debt criteria and having been assigned a High-Risk classification due to risk factors shown on the account receive the following notifications prior to disconnection eligibility according to the following timeline.</p> <ul style="list-style-type: none"> • Automated outbound call Day 0 • Disconnection of Service Notice Day 3 • Urgent Notice Day 8 • Start Severance Process Day 11 • Manual Call from Credit Agent Day 12> • Eligible for disconnection Day 13>
NW Natural	
13.	<p>Applicable rules and terms regarding NW Natural’s credit and collection processes primarily include, but are not limited to, the following Company tariff schedules: Rule 2 Establishment of Credit, Rule 3 Deposits, Rule 4 Billing, Payment Responsibilities and Payment Arrangements, Rule 5 Disconnection and Reconnection Procedures, Schedule B Bills and Bill Payment Options and Schedule C Miscellaneous Charges.</p> <p>Applicable Washington Administrative Code references primarily include, but are not limited to, WAC 480-90-123 Refusal of Service, WAC 480-90-128 Disconnection of Service, WAC 480-90-133 Reconnecting Service After Disconnection, WAC 480-90-138 Payment Arrangements, and WAC 480-90-143 Winter Low-Income Payment Program.</p>
PacifiCorp	
13.	<p>The following list of rules and rate schedules are used to govern the credit and collection processes used by PacifiCorp.</p> <p>Tariff Description</p> <ul style="list-style-type: none"> ○ Rule 9, Deposits <ul style="list-style-type: none"> Provides details on deposit requirements, the amount of deposit, payment dates, additional deposits, transfer of deposits, interest on deposits, deposit refunds, and additional arrangements a customer or applicant can make in respect to a deposit requirement. ○ Rule 10, Billing <ul style="list-style-type: none"> Contains information on bill payment timeframe, returned payment charge, equal payment plan, and late payment charges. ○ Rule 11A, Discontinuance of Service For Nonpayment <ul style="list-style-type: none"> Provides details on how the Company must notice a customer prior to disconnection of service for non-payment. ○ Rule 11B, Medical Emergency <ul style="list-style-type: none"> Provides additional customer protections for household where disconnection of electric service would aggravate a medical condition of a resident in the household, including postponement of disconnection, reconnection of service if power has been disconnected, and additional payment arrangements. ○ Rule 11D, Charges for Collection Activity <ul style="list-style-type: none"> Lists the type of collection related charges the Company may assess to a customer including reconnection charges, field visit charge, and an unauthorized reconnection/tampering charge. ○ Rule 11E, Reconnection of Service

	<p>PacifiCorp is not obligated to reconnect service until the cause for disconnection has been remedied.</p> <ul style="list-style-type: none"> ○ Schedule 300, Charges as Defined by the Rules and Regulations Schedule 300 is the list of charges that are assessed based on the Company’s Rules and Regulations including charges for the rules listed above. <p>Additionally, PacifiCorp complies with all state and federal rules and regulations regarding credit and collections.</p>
PSE	
13.	<p>Electric Tariff G (WN U-60): Schedule 80 Section 14 Payment of Bills (Sheet No. 80-m) Schedule 80 Section 16 Deposits (Sheet No. 80-n) Schedule 80 Section 17 Discontinuance of Service (Beginning on Sheet No. 80-O) Schedule 80 Section 18 Connection and Reconnection Charges (Sheet No. 80-R.1) Schedule 80 Section 29 Returned Item Charge (Sheet No. 80-Z) Schedule 80 Section 31 Late Payment Fee</p> <p>Natural Gas Tariff (WN U-2): Rule No. 5, Deposits Rule No. 9, Section 3 Payment Due Dates (Sheet No. 21) Rule No. 9, Section 4 Disconnection of Service (Sheet No. 21-A) Rule No. 9, Section 7 Connection and Reconnection Charges (Beginning on Sheet No. 21-B) Rule No. 9, Section 8 Returned Item Charge (Sheet No. 21-C) Rule No. 9, Section 9 Late Payment Fee (Sheet No. 21-D) Rule No. 9, Section 10 Disconnection Visit Charge (Sheet No. 21-D) Rule No. 15 Discontinuance of Service, Section 2 Discontinuance by the Company (Sheet No. 27)</p>

14. Please provide the following information regarding credit and collection:

- a. A detailed narrative describing your company’s credit and collection process. As part of this narrative, please identify both internal and external processes and explain how they operate, including any voluntary customer service principles;
- b. If applicable, the number of customers sent to collections in each of 2018 and 2019; and
- c. If applicable, the number of low-income customers who had account balances sent to collections in the year the customer received energy assistance.

Question	Summary of Comments
Avista	
14.	<i>Responses are provided below in subsections 14a – 14c.</i>
14a.	<p>Avista’s collections process begins when a customer’s unpaid bill becomes past due, 22 days after the bill issue date. This process includes a notice series, pursuant to WAC 480-100-128(4) and WAC 480-90-128(4), as outlined in the Collections Process below. Customers receive paper notices and may also opt to receive these notices electronically via email or text message depending on their communication preferences. At any time during the collection cycle, customers are able to establish payment arrangements (with terms up to 18-months) through their MyAccount on MyAvista.com, through the Company’s automated phone system, or by speaking with a CSR. Such arrangements halt the collections process. As noted in our response to Question 6, Avista’s CSRs look to meet customers where they are while setting payment arrangements, and while there are ideal guidelines for setting arrangements (i.e., the goal being to get the customer caught up on their past due balance prior to the next bill’s due date, to avoid</p>

Question	Summary of Comments
	<p>compounding the affordability issue the customer is experiencing), CSRs have the freedom to set arrangements that best suit the individual need of that customer.</p> <p>Customers who find themselves in a past due situation are highly encouraged to reach out to CAAs to learn more about the energy assistance options available to them. If a customer is seeking an energy assistance appointment, the collections process is placed on hold awaiting the outcome of such appointment. The Company defers to the CAAs for any external processes they may have in place. The illustration below shows the typical timeline of Avista’s collections process.</p> <p>Collections Process</p> <pre> graph LR A[Customer Bill Issued Day 1] --> B[Customer Bill Due Date Day 20] B --> C[Past Due Notice Day 22] C --> D[Final Notice Day 27] D --> E[Automated Phone Call Day 34] D --> F[Potential Disconnect Low-Income - Day 39 Non-Low-Income - Day 38] E --> G[Notice Due Date Day 35] G --> H[Low-Income Premise Visit Day 36] H --> F </pre> <p>If, after the above-described collections process has run its course, a customer finds themselves in a situation where they have been disconnected for non-payment, the account balance after any paid deposit on file is applied, is transferred to a separate account and becomes “Prior Obligation”, pursuant to WAC 480-100-123(3) and 480-90-123(2). Prior to the moratorium on deposits and reconnect fees, a customer was required to pay one-half of a new deposit and the applicable reconnect fee to be reconnected, and may establish arrangements on their Prior Obligation balance if they choose. If arrangements are not made on the Prior Obligation debt, the account balance will be transferred to a collection agency following the Collection Agency Referral Process outlined below, starting with a closing bill. Accounts that are closed with an unpaid balance follow the same process. Customers can add arrangements to their Prior Obligation or closed account balance at any time before it is transferred to a collection agency. Avista uses several collection agencies to assist in recovering unpaid debt. Each collection agency has its own set of guiding principles and works closely with customers who reach out to them to establish arrangements that work best for each customer’s individual needs. The collection agencies used by Avista do not report unpaid debt owed to any of the credit reporting bureaus.</p> <p>Collection Agency Referral Process</p> <pre> graph LR A[Closing Bill Issued Day 1] --> B[Closing Bill Due Date Day 20] B --> C[Closing Bill Reminder Letter Day 26] C --> D[Automated Phone Call Day 36] C --> E[Unpaid Balance Referred to Collection Agency Day 58] D --> F[Final Closing Bill Reminder Letter Day 46] F --> E </pre>

Question	Summary of Comments						
14b.	<p>The table below depicts the total number of customers with accounts referred to a collection agency during 2018 or 2019. Avista only refers accounts that are closed with a balance owing for more than 42 business days from the closing bill due date. Prior Obligation accounts are treated as closed accounts and are included in the numbers provided below. Prior Obligation debt accounts for 30% of the balances referred to a collection agency in 2018 and 31% in 2019.</p> <table border="1" data-bbox="354 436 755 546"> <thead> <tr> <th>Year</th> <th>Total Customers</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>20,897</td> </tr> <tr> <td>2019</td> <td>19,912</td> </tr> </tbody> </table>	Year	Total Customers	2018	20,897	2019	19,912
Year	Total Customers						
2018	20,897						
2019	19,912						
14c.	<p>The table below reflects the number of low-income customers who had closed accounts with unpaid balances or Prior Obligation balances that were sent to a collection agency the year they received energy assistance.</p> <table border="1" data-bbox="354 653 755 762"> <thead> <tr> <th>Year</th> <th>Total Customers</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>570</td> </tr> <tr> <td>2019</td> <td>445</td> </tr> </tbody> </table>	Year	Total Customers	2018	570	2019	445
Year	Total Customers						
2018	570						
2019	445						
Cascade							
14.	<i>Responses are provided below in subsections 14a – 14c.</i>						
14a.	<p>The following is a detailed narrative of Cascade Natural Gas’ credit and collection processes.</p> <ul style="list-style-type: none"> • Accounts are established as Low, Medium, and High risk before they enter Collections. <ul style="list-style-type: none"> o Low risk customers follow a collection path with just one event: an automated call with no threat of disconnection. o Medium risk accounts follow a collection path with two events: an automated call and a softer reminder letter; no threat of disconnection. o High risk accounts follow a collections path with several events: an automated call, required disconnect notices and if no payments are received or payment arrangements made, an agent-led manual call prior to scheduling a field visit for disconnection. <p>Because this is custom programming, we can adjust the path based on conditions on the Account.</p> <ul style="list-style-type: none"> o For example. If an Account is deemed Low Risk, but has no phone number, we will automatically advance it to the Medium Risk Category, so that a written reminder can be sent and contact with that customer is not lost. o Likewise, if an Account is deemed High Risk, but the amount owing on the Account is covered in full by a held deposit (provided we can collect deposits), then the risk will automatically be reduced. <p>A high-risk Residential Account will follow the following collection timeline:</p> <ul style="list-style-type: none"> • Automated Call Day 0 • Disconnection of Service Notice Day 3 • Urgent Notice Day 8 • Start Severance Process Day 11 (System notification to Credit Department through nightly processing) • Manual Agent-Led Call Day 12 (or first available work date) • Eligible for Disc Day 14 (or first available schedule date) <ul style="list-style-type: none"> • Other outbound contact points include: <ul style="list-style-type: none"> • Manual agent-led calls any time a short-term pay plan is not kept by the customer. • Manual agent-led calls any time a payment is returned for non-sufficient funds. 						

	<ul style="list-style-type: none"> Manual agent-led calls to customers who may qualify for certain energy assistance opportunities. <p>At any point, a customer can contact Cascade with payment of their past due balance, schedule a payment arrangement, or discuss energy assistance options that would prevent disconnection.</p>
14b.	<p>SEVERANCE AND WRITE OFF</p> <p>After an account creates a closing bill, if there is no attempt to reconnect service, the customer has 36 days before the debt enters into a Write-Off Process. During the 68-day Write-Off Process, the customer receives two written final bill letters and a manual agent-led call, attempting to contact the customer for payment or payment arrangement and to notify the customer that referral to a collection agency is imminent. From the time of the final bill to the time the debt is written-off and sent to a third-party collection agency is approximately 105 days.</p> <p>b. The number of customers sent to collections in each of 2018 and 2019: 2018 – Approximately 4,577 referrals to 3rd party collection agencies* 2019 – 4,045 referrals to 3rd party collection agencies * In 2018 Cascade implemented a new Debt Recovery System and signed new contracts with collection agencies. During this time there was a significant transition in our data which may impact our ability to provide exact numbers.</p>
14c.	<p>The number of low-income customers who had account balances sent to collections in the year the customer received energy assistance.</p> <p>2018 – 23* 2019 - 25 * In 2018 Cascade implemented a new Debt Recovery System and signed new contracts with collection agencies. During this time there was a significant transition in our data which may impact our ability to provide exact numbers.</p>
NW Natural	
14.	<i>Responses are provided below in subsections 14a – 14c.</i>
14a.	Please see Attachment 5 .
14b.	In 2018, there were 1,127 accounts sent to collections. In 2019, there were 1,055 accounts sent to collections.
14c.	In 2018 and 2019, there were 33 and 18 low-income customers, respectively, who had account balances sent to collections in the year the customer received energy assistance. Note – low income is defined as any energy assistance received by the customer during calendar years 2018 or 2019.
PacifiCorp	
14.	<i>Responses are provided below in subsections 14a – 14c.</i>
14a.	<p>PacifiCorp utilizes third party collection agencies as part of our inactive collections process only. Once an account has closed and completed the final bill cycle, it may be assigned to one of our agencies to pursue collection of the outstanding balance.</p> <p>Approximately 45 days following closure of the electric service account, any outstanding balance is assigned to a third-party collection agency for repayment attempt. A pre-collect letter is sent to the customer to provide the opportunity to pay the debt prior to the collection agency beginning collection efforts. As part of the collection effort our third-party agencies utilize multiple channels to reach customers including phone calls and letters. Agency staff is trained to negotiate flexible payment arrangements with customers. If the debt is not paid within 90 days of assignment to the collection agency and the balance is greater than \$100.00, the debt may be reported by the collection agency to the customer’s credit bureau. If the customer does not keep arrangements or promise to pay, the debt may be pursued through the legal process, which may result in wage or bank garnishments.</p>

14b.	Category	2018	2019									
	Low-Income Customers	258	208									
	Non Low-Income Customers	4,825	4,170									
	Total	5,083	4,378									
14c.	<i>See above table for response to 14c.</i>											
PSE												
14.	<i>Responses are provided below in subsections 14a – 14c.</i>											
14a.	<p>Puget Sound Energy’s dunning process, which is our collection process, consists of phone outreach, mailed outreach, and door-to-door interactions. If a customer becomes past due after invoicing, our collections process considers several attributes to determine whether the customer enters into dunning. We look at the days in arrears, arrearage amount, and behavioral trends over the last 12 months (if that length of time is available), to calculate an overall score that determines if dunning will commence.</p> <p>If the customer is eligible to dun, it begins with several phone outreach attempts. If we are unsuccessful at reaching the customer, they are mailed an urgent notice. Seven days later, they are mailed a Final notice. If the customer does not take positive action on their account, they may ultimately reach our disconnection queue.</p> <p>When PSE starts up our disconnection process post Disconnect Moratorium, PSE will make a field collections visit to customers with a final notice, where we attempt to collect and promote options available for the customer to prevent a disconnection, such as payment plans and PSE energy assistance programs. If the customer is unable to enroll in a payment plan or seek energy assistance, electric service may be disconnected. Our “return to normal” processes as outlined in the AMI rule will not require a visit to all customers if they have an AMI remote capable meter, with the exception of those customers who have received energy assistance in the prior two years or who have a medical condition and certificate.</p> <p>PSE utilizes an internal collection team that conducts phone outreach for customers that are past due, on both active and closed accounts, and if a final bill is unpaid the account is written off or placed with an external collections agency. Balances of \$25 or more may be placed with an external collections agency for further collections treatment. We do not report to any credit reporting agency.</p>											
14b.	<p>PSE does not send active accounts to collections, only closed accounts. PSE uses a third- party vendor to attempt collections of unpaid balances and offer multiple payment options to customers. Whether PSE collects on the unpaid balance or not, these accounts are not reported to any of the credit bureaus (Experian, Trans Union or Equifax).</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="3"># CUSTOMERS SENT TO COLLECTIONS</th> </tr> <tr> <th>CUSTOMER TYPE</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>68,424</td> <td>58,346</td> </tr> </tbody> </table>			# CUSTOMERS SENT TO COLLECTIONS			CUSTOMER TYPE	2018	2019	Residential	68,424	58,346
# CUSTOMERS SENT TO COLLECTIONS												
CUSTOMER TYPE	2018	2019										
Residential	68,424	58,346										
14c.	<p>Low-income is defined as anyone who received PSE HELP, LIHEAP, or Salvation Army pledge assistance during the calendar years 2018 and 2019. The timeframe is determined by the clearing date of the pledge (i.e., when it cleared the customer's account). Not all customers below were disconnected for non-payment. For example, the customer could have moved and had their final bill on the old account sent to collections. PSE does not send active accounts to collections, only closed accounts. PSE uses a third- party vendor to attempt collections of unpaid balances and offer multiple payment options to customers. Whether PSE collects on the unpaid balance or not, these accounts are not reported to any of the credit bureaus (Experian, Trans Union or Equifax).</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="3"># CUSTOMERS SENT TO COLLECTIONS</th> </tr> <tr> <th>CUSTOMER TYPE</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td>1,691</td> <td>1,399</td> </tr> </tbody> </table>			# CUSTOMERS SENT TO COLLECTIONS			CUSTOMER TYPE	2018	2019	Residential	1,691	1,399
# CUSTOMERS SENT TO COLLECTIONS												
CUSTOMER TYPE	2018	2019										
Residential	1,691	1,399										

Disconnection Notices

15. *Has your company identified opportunities to improve customer notice rules? Please describe those opportunities and the steps your company is taking to implement them.*

Question	Summary of Comments
<i>Avista</i>	
15.	The Company has not identified any opportunities to improve the customer notice rules.
<i>Cascade</i>	
15.	<p>Cascade Natural Gas often utilizes Option 1 for Customer Notice Requirements; however, we improve upon customer notice exposure and read rates by utilizing all or a combination of the following in conjunction with bill inserts: bill inserts, social media, email, and website messaging.</p> <p>In July 2021, Cascade Natural Gas worked with the WUTC Consumer Protection group in accordance with the term sheet for U-200281 to revise Past Due and Urgent customer notices to remove all language perceived as threatening. The revised notices also include detailed energy assistance information as well as how and where payments are accepted.</p> <p>Additionally, on March 23, 2022, Cascade implemented a significant change to our billing system functionality that customizes the collections experience for residential customers into three unique paths based on risk factors identified on the account and introduced a new friendlier reminder letter in lieu of a disconnect notice.</p> <p>Prior to the change, all Residential customers in Washington qualifying for collections started the same collection path. Due to system limitations, all accounts received a disconnect notice even though some customers may have only required a gentle reminder.</p> <p>Even with the system limitations, while all accounts entering into collections received disconnect notices, only those accounts that qualified as high-risk were worked by the Credit Department for disconnection. Analysis was done outside of the system based on risk factors such as time in service, account balance, time since last payment and percentage of last payment, in order to ensure that only the most high-risk accounts were considered for disconnection; however, it didn't prevent disconnect notices from being sent to customers who may not have needed that kind of message.</p> <p>By modifying the system, our new process allows us to analyze residential accounts before they enter the collections process. Residential accounts now fall into one of three new risk classes and based on the risk class, will follow one of three unique collection paths. In testing, we saw a significant reduction in the number of customers receiving disconnect notices and we expect to see at least equally positive results in our live environment.</p> <p>THREE NEW RESIDENTIAL RISK CLASSES AND COLLECTION EVENTS:</p> <p>Low</p> <ul style="list-style-type: none"> • Starts the new Low-Risk Collections Process • Receives only an automated call. • Not eligible for disconnection. <p>Medium</p> <ul style="list-style-type: none"> • Starts the new Med-Risk Collections Process. • Receives an automated call and a new friendly reminder letter. • Not eligible for disconnection. <p>High</p> <ul style="list-style-type: none"> • Starts one of the Collections Processes that existed in the system previously. • Receives an automated call and appropriate letters of disconnection designed for WA during the appropriate season.

	<ul style="list-style-type: none"> Manual agent-led call made to avoid disconnection. At any time, customers can avoid disconnection by making contact with the company to pay their past due amount in full, establish a payment arrangement or apply for energy assistance. If no actions are taken by the customer, the account is eligible for disconnection. <p>Once an account is evaluated and initially assigned to one of the three risk classes, there are additional risk factors applied that can adjust the risk class up or down, such as when an account is initially low-risk and has no phone number on file for the automated call, or when the account is high risk but has a paid deposit that is larger than the amount in arrears.</p>
NW Natural	
15.	NW Natural has not yet identified opportunities to improve customer notice rules, but the Company will actively participate in docket U-210800 and may bring forth suggested improvements as issues are identified in the rulemaking process.
PacifiCorp	
15.	PacifiCorp worked with Staff and stakeholders during COVID-19 discussions in 2021 to implement changes to customer notices which included an addition to ask that the customer contact us to stop disconnection, changes to represent fees being waived until a specific date, removal of information about the Company’s policy to not knock on the customer’s door prior to disconnection and some other housekeeping changes. Additionally, as discussed above, PacifiCorp is working towards providing greater access to Spanish translations for customer communications.
PSE	
15.	PSE has enhanced preference center options which allow the customer the flexibility to select other delivery options of notices, such as email and SMS.

16. Please provide a list of all languages in which your company provides translated disconnection notices.

Question	Summary of Comments
Avista	
16.	Avista currently provides disconnection notices in English and Spanish.
Cascade	
16.	Notices sent by Cascade Natural Gas are only in English but include the following line in Spanish, “If you need translation help, call Cascade Natural Gas Corporation.”
NW Natural	
16.	<p>In each notice NWN sends, they include an insert in six languages that advises the customer that we are contacting them about their gas bill and they need to contact us immediately. That insert includes translation for the following languages: English, Spanish, Russian, Vietnamese, Thai, and Lao.</p> <p>When a customer calls NWN, they have representatives that can help them in Spanish; for other languages, they utilize the Language Line, which provides interpreter services in over 240 languages. More information can be found at: https://www.language.com/s/Phone.</p>
PacifiCorp	
16.	For disconnection notices, the past due and final notification printed on PacifiCorp bills is currently provided in English. See attached image samples that show the top portion of the customer’s bill. PacifiCorp leaves a door hanger at the customer’s location two days prior to the potential date of disconnection. All door hangers include text in Spanish letting customers know PacifiCorp is available 24 hours a day.

	<p>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.</p> <p>Your Balance With Us</p> <table border="1"> <tr> <td>Previous Account Balance</td> <td>106.82</td> </tr> <tr> <td>Payments/Credits</td> <td>0.00</td> </tr> <tr> <td>Past Due Amount</td> <td>106.82</td> </tr> <tr> <td>New Charges</td> <td>-60.00</td> </tr> <tr> <td>Current Account Balance</td> <td>\$166.82</td> </tr> </table> <p>Payments Received</p> <p>No payments have been received since your last billing statement.</p> <p>FINAL NOTICE As of the mailing date of this notice, we have not received your payment. Unless your delinquent balance is received in our office by the date shown, your electric service may be disconnected without further notice.</p> <p>You Must Act Now to Avoid Shut-Off!</p> <p>• Your Electric Service Past Due Amount of \$106.82 must be received by Mar 25, 2022, to avoid shut-off.</p> <p>Other ways to avoid Shut-off are shown at the end of this billing statement.</p> <p>Remember</p> <p>To bring your account current, you need to pay charges of \$166.82, which were detailed on your last monthly statement.</p> <p>Remember: Your New Charges of \$60.00 are still due by Mar 25, 2022.</p> <p>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:</p>	Previous Account Balance	106.82	Payments/Credits	0.00	Past Due Amount	106.82	New Charges	-60.00	Current Account Balance	\$166.82
Previous Account Balance	106.82										
Payments/Credits	0.00										
Past Due Amount	106.82										
New Charges	-60.00										
Current Account Balance	\$166.82										

PSE	
16.	Currently notices that are mailed USPS (Urgent and Final) are in English only. We are looking into expanding language options in the future. Today, communications on the web are available in multiple languages. Our process for web-based language options is based on the custom browser language settings set by our customers when visiting our website.

17. How does your company determine in which language(s) the customer should receive written communications (particularly in relation to the disconnection notice)?

Question	Summary of Comments
Avista	
17.	If a customer reaches out to Avista through an interpreter, or a language barrier is identified by a CSR, the CSR will ask the following question: "Currently our printed notices are available in English or Spanish. In the future, if we are able to offer notices in [the customer's language], which language would you prefer to receive notices in?" The CSR then notes the customer's account to capture the customers language preference. If the preferred language notated on the customer's account is Spanish, it triggers the disconnect notices to be sent in the customer's preferred language.
Cascade	
17.	Cascade Natural Gas utilizes data provided by the United States Census Bureau in conjunction with analytics from our utility website to determine languages that should be represented in our written communications, including disconnect notices.
NW Natural	
17.	Yes, all other written communications are in English. For disconnect notices, we also include the insert mentioned in the response to question 16.
PacifiCorp	
17.	PacifiCorp has an indicator in its system that is used to determine if a written communication should be sent in English or Spanish. The Company is continually adding more customer communications and outreach in Spanish, this includes ongoing weekly emails to customers who are behind on their bills. See the following link for a sample of this email: https://pacificorp.com/content/dam/pcorp/documents/en/pacificpower/my-account/billinserts/PP-WA-Residential-SPA-Jan.pdf .
PSE	

17.	Please see PSE’s response to question #16.
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18. Has your company identified any barriers in the process of providing notices to customers?

a. If so, please identify and describe these barriers.

b. Has your company taken steps to address any identified barriers?

c. Have the steps taken either reduced the number of disconnections or otherwise yielded results in terms of improving the disconnection process? If so, please provide the results and any analysis your company has conducted of the results.

Question	Summary of Comments
<i>Avista</i>	
18.	<i>Responses are provided below in subsections 18a – 18c.</i>
18a.	<p>The Company has identified the following barriers pertaining to customers receiving notices, some of which are outside of Avista’s control:</p> <ul style="list-style-type: none"> • Customer Contact Information. First, the Company has identified a barrier relating to incorrect customer contact information (phone number, email address or mailing address). Customer contact information is only as good as the information provided to the Company by the customer. Many customers change their email address or phone number and do not notify the Company of these updates. This could prevent customers from receiving collections notices and/or calls. • Technology. Some customers face technology barriers such as access to the internet or a mobile phone, such that they cannot receive notices by text or email in addition to paper notices. • Post Office Delays. Another barrier customers have shared involves post office delays resulting in untimely notices being delivered or not being delivered at all. • Language Barriers. Lastly, providing notices in a customer’s preferred language has been identified as a barrier.
18b.	<p><u>Customer Contact Information</u> Avista is in the process of identifying potential solutions to address the barrier concerning incorrect customer contact information. One potential path forward is to send an annual email or post card asking customers to contact the Company or log in to their MyAccount to ensure their contact information is updated on a regular basis.</p> <p><u>Technology Barriers</u> The Company has taken a multifaceted approach to improving technology barriers for its customers. Avista equips its lobbies with CSRs that can accept payments, refer customers to CAAs, set payment arrangements, and answer billing questions. Avista’s field service representatives also accept payments, establish payment arrangements, and refer customers to assistance agencies while in the field for a collections order. For customers who prefer to receive notices electronically, they now have the ability to opt-in to electronic notices either through their email address or through a text message alert. Customers who opt-in to text message alerts also have the ability to pay all or a portion of their bill through their text message.</p> <p><u>Post Office Delays</u> Avista has limited control over notices once they have been mailed. To ensure notices are delivered to its customers, the Company receives automated updates from the United States Postal Service (USPS), which provides updated mail addresses to Avista when a “Change of Address” form is submitted to USPS. Avista also has a group of employees dedicated to researching mail that is returned to the Company by the post office. This group attempts to reach the customer in order to update their mailing address to prevent mail from continuously being returned to the Company.</p>

Question	Summary of Comments
	<p><u>Language Barriers</u> Lastly, to address language barriers Avista now provides its notices in English and Spanish. Spanish is the top language preference in its Washington service territory, aside from English. In order to have the most current linguistic information pertaining to its customers, the Company will be reevaluating primary languages in the coming years to include the influx of people moving into Avista’s service territory.</p>
18c.	The Company has not conducted such analysis; however, believes the steps it has described above does lead to a reduction of disconnection and improve the customer experience of the disconnection process
Cascade	
18.	Cascade Natural Gas has not encountered any barriers in the process of providing notices to customers.
18a.	N/A
18b.	N/A
18c.	N/A
NW Natural	
18.	No. The Company has not identified any barriers in the process of providing notices to customers.
18a.	N/A
18b.	N/A
18c.	N/A
PacifiCorp	
18.	No, however the Company continues to monitor and assess the environment to identify opportunities for improvement.
18a.	N/A
18b.	N/A
18c.	N/A
PSE	
18.	<i>Responses are provided below in subsections 18a – 18c.</i>
18a.	Some barriers we have seen are the USPS requirement (WAC rule)1, address issues which cause customer mail to be returned, and potentially a lack of customer attention to their mail.
18b.	PSE has enhanced preference center options which allow the customer the flexibility to select other delivery options of notices, such as email and SMS.
18c.	Since the pandemic we are unable to track notable changes due to the fact disconnections have not resumed.
Public Counsel	
18.	Notice Question 18 asks about barriers in the process of providing notices to customers. The Commission’s rules provide companies with various options on how to provide notice to customers. Utilities may mail notices, hang notices on doors, and call customers.5 Public Counsel will review the utilities’ responses with interest regarding whether they identify new, more effective methods of communicating with customers and whether traditional methods are more or less effective.

19. Are you aware of any policies, rules, or guidance concerning equity in developing or providing customer notice in use by other companies or state commissions? If so, please identify the policies, rules, or guidance, referencing the company or state commission that has adopted the policy, rule, or guidance.

Question	Summary of Comments
Avista	
19.	Avista is not currently aware of any policies, rules, or guidance concerning equity in developing or providing customer notices that are in use by other companies or states.
Cascade	
19.	<p>Cascade Natural Gas is participating in discussions with the Oregon Public Utilities Commission, advocates, and peer utilities involving possible changes to their consumer protection rules, Rule 21.</p> <p>These changes being discussed include modifying late fee, reconnect fee, deposit, and credit and collections processes, including timing of disconnection notices and the disconnect process to increase protections <i>specifically</i> for customers designated as low income. The possible changes being discussed are <i>not targeted to all customers</i> who may be subject to these fees or disconnects. These discussions are ongoing with no changes adopted at this point.</p>
NW Natural	
19.	NW Natural is not aware of policies, rules or guidance regarding equity in developing or providing customer notice in use by other companies or state regulatory commissions. NW Natural notes that the rules for customer notice in Oregon, which is the Company’s other natural gas state jurisdiction, are similar to the rules in Washington.
PacifiCorp	
19.	PacifiCorp is not aware of any policy, rule, or guidance concerning equity in use by other companies or state commissions in developing customer notices at this time.
PSE	
19.	At this time, PSE is not aware of any such policies, rules, or guidance concerning equity in developing or providing customer notice.
NWEC	
19.	<p>Here are a few resources that may be of interest to Commissions staff and other stakeholders:</p> <ul style="list-style-type: none"> • NCLC’s Customer Bill of Lights for Affordable Utility Services: https://www.nclc.org/issues/energy-utilities-a-communications/nclc-energy-utilities-telecomblog/a-new-customer-bill-of-rights-affordable-utility-services.html • NAACP’s Lights Out in the Cold: https://naacp.org/resources/lights-out-cold • Brown Hope Community Focus Group report, prepared for the Oregon Public Utility Commission: https://edocs.puc.state.or.us/efdocs/HAC/um2114hac114859.pdf
Public Counsel	
19.	<p>Research from the National Consumer Law Center (NCLC) reveals that “Black and Latinx households ... are sent shutoff notices more frequently compared to white households with comparable income.”⁶ NCLC further iterates that the “goal should be to reduce the frequency of both disconnections and disconnection notices, while also improving overall rates of utility revenue collection by educating customers about all available assistance.”⁷ Public Counsel recommends that utilities, stakeholders, and other relevant experts to discuss ways to improve communication and education to reduce disconnection notices and disproportionate harm to marginalized communities. Public Counsel looks forward to ongoing discussions with all stakeholders to improve customer notice practices so they do not perpetuate historic inequities.</p>
TEP	

19.	<p>The Energy Project thanks the Commission for asking parties to submit best practices concerning equity and encourages the Commission to consider incorporating these best practices into its rules. TEP reviewed numerous surveys of utility and regulatory practices. Several of the most informative resources we found are published by the National Consumer Law Center (NCLC), which houses leading experts in addressing equity through regulatory policy. NCLC worked with other consumer advocates to develop a thought-leading set of recommendations concerning equity for utility policymakers titled <i>Implementing a Roadmap to Utility Service as a Human Right</i>.⁷ Attachment A to these comments includes NCLC’s recommendations and well as an introduction.</p>
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20. Are you aware of any best practices or examples from other jurisdictions or other utility sectors that the Commission should consider in this proceeding regarding late fees, disconnection fees, reconnection fees, deposits, credit and collection practices, and customer notices? If so, please identify these best practices or examples, referencing the company or jurisdiction that has adopted these practices.

Question	Summary of Comments
Avista	
20.	<p>Avista’s service territory spans across portions of Washington, Oregon, and Idaho, which means the Company must adhere to the differing regulations of three dissimilar jurisdictions. In sharing best practices or examples from other jurisdictions, Avista feels the Commission should consider Idaho’s rules and regulations pertaining to credit and collections practices. To provide a basis for this suggestion, Avista notes that a simple comparison of the average past due balance for the Company’s Washington residential customers verses its Idaho residential customers helps to illuminate the issue outright: the average residential arrears in Washington is \$358.58, compared to \$109.28 in Idaho. While several factors may contribute to these differences, such as income levels, affordability of utility rates, and the recent COVID-19 moratorium on disconnections, these disparities are not new.</p> <p>The collections practices employed in Idaho are essentially the same as outlined above for Washington, with the exception being Idaho’s reconnection requirements. Avista believes these requirements, while perceptively more stringent than those of Washington, are more effective in reducing residential arrears and establishing customer-focused payment arrangements without the use of (or need for) deposits. Deposits are charged by Avista to aid in reducing unpaid balances at the time of disconnect or when the account closes. After having been disconnected for nonpayment, Idaho customers are required to pay the full <i>past due</i> balance before service is reconnected and, in turn, the customer is not charged a deposit as there is no longer a need to further secure the account.</p> <p>In contrast, Washington’s Prior Obligation rule allows customers that are disconnected for nonpayment to deprioritize the past due balance they have accrued and are still responsible for, having their service reconnected at no cost, save for any applicable deposit.² As previously noted, this Prior Obligation balance is then separately addressed on an optional basis, with no actual consequence for nonpayment, even after being transferred to a collection agency where the continued unpaid balance is not reported to credit bureaus. In sum, under the current Prior Obligation rules and moratorium on fees and deposits, a residential customer in Washington essentially has no requirement to pay for the service they receive as there are no payments or fees required to turn on service, no payments or fees required to be reconnected for service following a disconnection for non-payment, and because there is no obligation to pay a Prior Obligation balance.</p> <p>The absence of Prior Obligation and the requirement that a payment be made towards the customer’s past due balance in order to retain service, helps Idaho residential customers maintain significantly lower arrearages than that of Washington residential customers. It is for these reasons that Avista does not agree with the elimination of deposits or reconnection fees for</p>

Question	Summary of Comments
	<p>residential customers as long as Prior Obligation rules remain in effect. Deposits help to eliminate, or at least reduce, the past due balance owed at the time of disconnection and reconnection fees help to offset the actual costs incurred to disconnect and reconnect a customer. Under the existing rules, the minimum amount required for reconnection is ½ of a new deposit and the applicable reconnect fee; if deposits and reconnect fees are eliminated and the Prior Obligation rule remains in effect, there would then be no minimum payment due for reconnection, thus effectively eliminating any purpose for non-payment disconnections altogether. If this is an outcome of this proceeding, the Company is unsure how customer debt will be secured and to what extent these write-off delinquencies will grow and, ultimately, be paid for by all customers. Because of this potential outcome, the Prior Obligation rules must be included in this rulemaking and for Avista, we firmly believe that the Prior Obligation rules should be permanently removed. Prior Obligation may have been a useful tool in the past, but it is no longer relevant, not only for the reasons mentioned above, but also because of the growing amount of energy assistance which cannot be applied to Prior Obligation, customer support, and bill discounts offered or proposed to be offered to customers moving forward.</p>
Cascade	
20.	<p>Cascade Natural Gas is participating in discussions with the Oregon Public Utilities Commission, advocates, and peer utilities involving possible changes to their consumer protection rules, Rule 21. These changes being discussed include modifying late fee, reconnect fee, deposit, and credit and collections processes, including timing of disconnection notices and the disconnect process to increase protections <i>specifically</i> for customers designated as low income. The possible changes being discussed are <i>not targeted to all customers</i> who may be subject to these fees or disconnects. These discussions are ongoing with no changes adopted at this point. The other states in which Cascade operates are not proposing any changes to normal fees, deposits, collection practices, or customer notices as allowed by rules or tariffs. Cascade believes that approach is a best practice and does not violate the regulatory cause causation principle to have the cost borne by those who cause the expense.</p>
NW Natural	
20.	<p>NW Natural is not aware of best practices or examples from other jurisdictions or other utility sectors that could be recommended for Commission consideration in this proceeding regarding the indicated topics. NW Natural notes that the Public Utility Commission of Oregon (PUC) is undertaking a similar rulemaking for the consumer rules provided in Oregon Administrative Rules Chapter 860 Division 21. This rulemaking, docketed by the PUC as AR 653, is still in the informal stage and is expected to continue through this year.</p>
PacifiCorp	
20.	<p>PacifiCorp is not currently aware of best practices that should be considered in this proceeding, though the Company is always willing to incorporate reasonable suggestions to its policies and practices that might mitigate inadvertent billing consequences to disadvantaged communities.</p>
PSE	
20.	<p>At this time, PSE is not aware of any such examples from other jurisdictions or utility sectors that the Commission should consider in this proceeding. Washington’s unique prior obligation² rules impact PSE’s processes with regard to disconnections. If the Commission is considering the permanent elimination of fees and deposits, it will need to consider those changes in light of the prior obligation rules.</p>
NWEC	

20.	The Oregon PUC has been pursuing similar discussions spurred by the COVID-19 pandemic in docket AR 6532, regarding strengthening “Customer Protections Concerning Disconnections”. This Oregon docket is currently more expansive than is currently presented in this Washington UTC docket; given that four of the five Washington energy utilities have service territory in Oregon, we recommend that Washington Commission staff closely watch the Oregon proceeding.
Public Counsel	
20.	<p>In response to the disparities highlighted by the COVID-19 crisis, the NCLC published a Utility Customer Bill of Rights, establishing a roadmap to keeping people connected to essential utility services regardless of a customer’s economic status. Some relevant components of the Utility Customer Bill of Rights include:</p> <ul style="list-style-type: none"> • State laws, including those that direct the actions of public utility commissions and noncommission-regulated utilities, should explicitly recognize that utility service is essential to public health and safety, and that no customer should be disconnected based on the inability to afford essential utility service. • Disconnections based on inability to pay for low-income households must be eliminated – not just reduced – to ensure access to essential utility service • Late payment and reconnection fees, deposits, and similar punitive charges, which often far exceed the utility’s cost of short-term borrowing, disproportionately penalize low-income households while providing a source of unwarranted profit for utilities, should be eliminated for qualified low-income customers, and in no case should exceed the true financial cost of service. • Deposits to start service or re-establish service for residential customers should be eliminated. <p>The NAACP also conducted comprehensive research on the disproportionate impacts of disconnections on communities of color in their 2017 report, <i>Lights Out in the Cold</i>.⁹ The NAACP’s report also includes recommendations for customer notice practices and bill assistance as a means to reduce disconnection notices and disconnections for non-payment. Appendix B of the report also includes a comprehensive summary of state disconnection policies. This can serve as a basis for discussion among stakeholders in this docket.</p>
TEP	
20.	The Energy Project thanks the Commission for asking parties to submit best practices concerning equity and encourages the Commission to consider incorporating these best practices into its rules. TEP reviewed numerous surveys of utility and regulatory practices. Several of the most informative resources we found are published by the National Consumer Law Center (NCLC), which houses leading experts in addressing equity through regulatory policy. NCLC worked with other consumer advocates to develop a thought-leading set of recommendations concerning equity for utility policymakers titled <i>Implementing a Roadmap to Utility Service as a Human Right</i> . ⁷ Attachment A to these comments includes NCLC’s recommendations and well as an introduction.

Additional Comments from Consumer Advocates:

Question	Summary of Comments
NWEC	
<p>NWEC has four recommendations moving forward:</p> <ol style="list-style-type: none"> 1. This rulemaking could be broader to consider whether and when customer disconnection for nonpayment is an appropriate action for a utility to take, and disconnection policy in general. 	

This discussion could spur additional questions to the utilities, such as when they decide to pursue disconnection (e.g., prioritization amongst customers) and whether mitigating factors come into that decision (e.g., temperature, past access to emergency funds).

2. This Notice references low-income customers as those who had received low-income assistance in 2018 and 2019. While we understand that this is a way to help scope utility responses to these questions, going forward, we know that through the Clean Energy Transformation Act, our definition of a low income customer is broader. There are also likely some customers who struggle to pay bills that fall outside even the CETA definition of a low-income customer. In the protection of customers and in ensuring adequate access to utilities, we think that the Commission definition should be as broad as possible.

3. This rulemaking should actively seek out the voices and experiences of low-income customers and BIPOC customers and communities. Commission staff may need to seek out groups for input, rather than necessarily expecting these communities to come to Commission meetings.

4. This rulemaking should not solely be constrained to energy companies, at least in the end – while there may be some efficiencies that exist in thinking about the regulation of the five investor-owned energy utilities in the state, there are also critical needs and considerations for customers of privately owned water, sewer, and telecommunication companies.

Public Counsel

The proposed term sheet approved by the Commission in Order 01 explained that the rulemaking docket would pay “particular attention to the experience of those limited English proficiency and customers of color.” Centering the experiences of Black people, Indigenous people, Latinx people, Asian people, and other people of color is largely important because the pandemic highlighted these communities’ disparate experiences. The Commission has an opportunity and obligation to evaluate current policies that impact customers’ ability to maintain or reestablish service to ensure that the policies do not perpetuate inequities.

This rulemaking will consider potential amendments to customer notice rules, credit reporting rules, and collection rules. This rulemaking will also assess the future of customer fees, including late fees, disconnection fees, reconnection fees, and deposits. The Commission should further consider the impact of disconnections for non-payment on customers and the overall system and whether continuing this practice is in the public interest. Public Counsel believes that a close examination will demonstrate that disconnection harms customers, perpetuates inequities, and provides only temporary benefits to utilities.

Prior obligation currently provides strong protection for customers disconnected for nonpayment. Under prior obligation, customers may reconnect with amounts owing, and utilities may not disconnect the customers for the arrearage going forward. If disconnection for nonpayment is disallowed, the Commission should review the role of prior obligation. Prior obligation may need to be reimaged and redesigned if the Commission decides to limit disconnection practices.

Further, Public Counsel recommends including data reporting to the scope of this rulemaking. Throughout the pandemic, electric and natural gas utilities have been required to report critical data regarding customer arrearages in Docket U-200281. This data has been vital in assessing the pandemic’s impact on Washington utility customers. Looking forward, arrearage data will be useful to Commission Staff and other stakeholders to understand the relationship between customer arrearages, fees and deposits, and disconnection for non-payment. Additionally, arrearage data will be central in assessing whether utilities are transitioning to non-emitting and renewable energy in an affordable way for customers. As such, it is important to include arrearage and other data reporting requirements in this docket.

The CR-101 identifies Chapters 480-90 and 480-100 WAC, pertaining to natural gas and electric utilities, as the subject of this rulemaking. Topics identified in the CR-101 include “service applications, responsibilities, connections, disconnections, reconnections, refusals, interruptions, deposits, fees, payment arrangements and programs, customer information, billing requirements, billing payments, customer notice, credit, collections, and other related topics.” Public Counsel believes that these topics are relevant and should be thoroughly considered.

Although the CR-101 identifies electric and natural gas rules, the Commission should consider including Chapter 480-110 WAC, pertaining to water companies, in this rulemaking. The issues to be discussed are relevant with respect to water customers, and expanding the inquiry to water would be consistent with the work done in Docket U-200281. Docket U-200281 addressed natural gas, electric, and water utilities' practices during the pandemic and offered protections to customers of those utility services. Natural gas, electricity, and water are essential services, and keeping customers connected to service provides individual, public, and system benefits.

TEP

The Energy Project raises its concerns regarding payment plan and bill assistance availability, utilities' medical certificate practices, data collection and reporting, and additional requirements in the event the Commission allows disconnections for non-payment.

- TEP wants rules allowing access to payment arrangements by all customers instead of limited to the current two situations 1) medical emergencies and 2) the winter low-income payment program.⁵
- TEP argues that low-income customers should have access to bill assistance, and that those customers most in need should have Percent Income Payment Plans coupled with Arrearage Management Plans.
- TEP advocates for revising medical certificate practices and raises the concern that the 60-day renewal requirement is too difficult for customers. TEP does not provide a specific remedy.
- If disconnections for non-payment are allowed to continue, TEP advocates for the following requirements:
 - A “last knock” before all disconnections, or, at minimum, a “last knock” for highly impacted communities;
 - A minimum balance threshold for non-payment disconnections;
 - Commission approval prior to residential disconnection;
 - Utilities must provide resources to disconnected customers including information about customer rights and protections, available assistance, and the Commission’s contact information.
- TEP requests additional data on:
 - Deposit requirement criteria, including a narrative description of the criteria, factors, and relevant information used to determine whether customers are required to pay a deposit;
 - Utilities’ reporting practices to credit bureaus, including historic practices, collection agencies used, and terms of contracts with and policies of collection agencies;
 - Credit scores and how the utilities use them;
 - Payment locations, including availability, tender accepted at each location, and fees;
 - Premise visits for disconnections and customer payments;
 - Any liens that utilities place on customer property.

The Sierra Club

As Commission Staff noted, “there is mounting concern that late fees and other similar fees contribute to the cycle of debt for many customers that are already struggling with unmanageable bills. There are also questions concerning the effectiveness of these fees and if they actually dissuade late payment.”⁶

Following from this; Sierra Club recommends that this proceeding “zoom out” as much as possible to examine broader questions about how our utility payment system might promote equity in the long term.

Mounting utility bill debts and the many barriers to accessing the assistance currently available will only hinder individuals' and family's ability to move forward from the pandemic. This is an investment in the short-

⁵ Code Maine R. 65-407, Chapter 815, Section 9(F), at p. 23 (Residential Payment Arrangements), <https://www.maine.gov/sos/cec/rules/65/407/407c815.docx>

⁶ In re: the Response to the COVID-19 Pandemic, Docket U-200281, Order 01, paragraph 17 (Oct. 20, 2020).

term and long-term well-being of Washington State and all its residents. As such, we recommend that the rulemaking:

- a) Consider disconnection policy in general, including whether and when customer disconnection for nonpayment is an appropriate action for a utility to take; and
- b) Includes data reporting as part of its scope. Throughout the pandemic, electric and natural gas utilities have been required to report data on their customer arrearages in Docket U-200281. This data has been vital to assess the pandemic's disparate impacts on utility customers in Washington and has allowed us to more fully understand what is working and what is not. In the future, similar arrearage data will be useful to Commission Staff and other stakeholders interested in pursuing a more equitable utility system; and
- c) Should not solely be constrained to energy companies, since there are also critical needs and considerations for customers of privately owned water, sewer, and telecommunication companies; and
- d) Should actively seek out input from groups representing low-income, BIPOC, disabled, Indigenous, non-native English speaking, and non-citizen utility customers for input, rather than necessarily expecting these communities to come to Commission meetings.

Appendix A – IOU Data Response Comparisons

2. Please provide the following information regarding the fees your company collected in 2018 and 2019, respectively:														
a. Please provide the total dollar amount collected from residential customers for disconnection fees and reconnection fees each year, identifying each fee category separately.														
b. Please provide the total number of residential customer accounts and the number of customer accounts assessed disconnection fees or reconnection fees each year. Please identify each fee category separately, include only reconnection fees for previously disconnected customers, and exclude new customers reconnecting at an existing service address.														
c. Please provide the percentage of retail revenue your company derived from residential customer disconnection fees and reconnection fees each year, identifying each fee category separately.														
d. If these disconnection fees and reconnection fees were removed from the company's tariff and recovered in base rates instead, how much would residential bills increase based on your company's currently approved rate spread? Please provide both a percentage increase and an average residential customer bill increase amount.														
	Question 2 (Disconnections only)						Question 2 (Reconnections Only)						Question 2	
	2a	2b	2c	2a	2b	2c	2a	2b	2c	2a	2b	2c	2d	2d
	2018			2019			2018			2019				
	Dollars	Count	Percentage	Dollars	Count	Percentage	Dollars	Count	Percentage	Dollars	Count	Percentage	Amount per bill	Percent
Avista Elec	\$7,584	947	0.0020%	\$4,096	512	0.001%	\$119,800	6,046	0.030%	\$164,061	8,274	0.050%	.10 cents	0.09%
Avista Gas	\$152	18	0.00004%	\$128	16	0.000%	\$3,926	192	0.00100%	\$4,080	194	0.001%	.0 cents	0%
Cascade	CNG does not assess disconnection fees. Only field visit fees and reconnection fees.						\$83,972	3,464	0.037%	\$72,680	3,058	0.029%	.02 cents	0.05%
NW Natural	NW Natural does not charge disconnection fees.						\$50,275	1,256	0.080%	\$49,275	1,224	0.080%	.04 cents	0.06%
PacifiCorp	\$4,275	267	0.0010%	\$3,826	241	0.001%	\$36,991	1,276	0.001%	\$24,413	839	0.006%	No answer	No answer
PSE	\$380,547	22,934	0.0110%	\$311,775	19,694	0.009%	\$1,565,128	40,699	0.047%	\$1,308,717	34,043	0.039%	.14 cents (Elec) .04 cents (Nat Gas)	0.15% (Elec) 0.06% (Nat Gas)

3. Please provide the following information regarding the cost of disconnection and reconnection in 2018 and 2019, respectively, identifying each fee category separately.									
a. What is the total cost the company incurred disconnecting residential customers each year?									
b. What is the total cost the company incurred reconnecting residential customers each year?									
c. What is the average annual cost for disconnection and reconnection by year?									
d. If your company has deployed advanced metering infrastructure (AMI), please provide separately a cost breakdown of disconnection and reconnection fees for residential customers with AMI meters installed. Please also provide a side-by-side comparison of costs incurred both to disconnect and reconnect non-communicating meters with costs incurred to disconnect and reconnect AMI meters.									
	Question 3								
	3a	3b	3a	3b	3c	3c	3c	3c	3d
	2018		2019		2018		2019		
	Disconnect	Reconnect	Disconnect	Reconnect	Avg Disconnect	Avg Reconnect	Avg Disconnect	Avg Reconnect	AMI capabilities?
Avista	Working with company on their response								No answer
Cascade	\$250,600	\$105,800	\$205,860	\$96,000	\$228,230	\$100,900	\$228,230	\$100,900	Have not deployed AMI in Washington
NW Natural	\$136,985	\$291,543	\$138,924	\$275,633	\$25.07/cust	\$66.12/cust	\$25.07/cust	\$66.12/cust	
PacifiCorp	\$45,835	\$44,712	\$33,261	\$32,851	\$23.86/cust	\$37.50/cust	\$23.86/cust	\$37.50/cust	
PSE	\$5,624,722	\$2,743,106	\$5,567,885	\$2,313,161	\$126.49/cust	\$68.84/cust	\$150.48/cust	\$69.39/cust	\$0

4. Please provide the following information related to residential disconnections for non-payment in 2018 and 2019, respectively.						
a. The number of disconnections						
b. The average duration of disconnection						
c. The average duration of disconnection for non-payment for low-income customers each year?						
	Question 4					
	4a		4b		4c	
	2018	2019	2018	2019	2018	2019
Avista	6,560	9,032	19.83 Hours	12.73 Hours	20.24 Hours	13.09 Hours
Cascade	3,387	2,944	37.09 Days	37.88 Days	23.46 Days	28.42 Days
NW Natural	1,288	1,254	10 Days	9 Days	17 Days	6 Days
PacifiCorp	1,952	1,375	.85 Days	.86 Days	.93 Days	.76 Days
PSE	47,708	39,644	1.9 Days	1.9 Days	1.8 Days	1.8 Days

5. Please provide the following information regarding disconnections among low-income residential customers:						
a. In each of 2018 and 2019, what percentage of total residential customer disconnection fees and reconnection fees were charged to low-income customers? Please identify the percentage for each fee category separately.						
b. What percentage of customers facing disconnection successfully applied for and received energy assistance that allowed them to avoid disconnection in 2018 and 2019, respectively?						
	Question 5					
	5a				5b	
	2018 Disconnect	2018 Reconnect	2019 Disconnect	2019 Reconnect	2018	2019
Avista Electric	28.0%	28.0%	25.0%	27.0%	5.0%	5.0%
Avista Natural Gas	6.0%	12.0%	13.0%	10.0%		
Cascade	N/A	4.1%	N/A	2.8%	3.0%	2.5%
NW Natural	N/A	4.5%	N/A	3.1%	0.36%	0.29%
PacifiCorp	N/A	13.9%	N/A	10.8%	0.21%	0.11%
PSE	8.8%	8.6%	9.0%	5.1%	8.1%	7.7%

8. Please provide the following information regarding the residential customer deposits collected by your company in 2018 and 2019, respectively:										
a. Please provide the total dollar amount collected for residential customer deposits each year.										
b. How many customer accounts paid deposits each year?										
c. What percentage of retail revenue did your company derive from residential customer deposits each year?										
d. How many customers used part or all their deposit to offset account balances?										
e. What percentage of customers who used part or all their deposit to pay for account balances each year requested reconnection within 12-months of disconnection?										
	Question 8									
	8a		8b		8c*		8d		8e	
	2018	2019	2018	2019	2018	2019	2018	2019	2018	2019
Avista	\$1,351,378	\$1,471,228	7,719	8,735	N/A	N/A	11,570	13,170	24.00%	29.00%
Cascade	\$454,435	\$410,162	5,842	5,392	0.20%	0.17%	5,394	5,259	26.93%	21.41%
NW Natural	\$161,229	\$146,316	1,799	1,705	N/A	N/A	1,689	1,678	79.30%	83.10%
PacifiCorp	\$2,132,163	\$1,818,145	11,067	10,065	0.69%	0.59%	4,751	3,752	12.21%	
PSE	\$27,905,477	\$10,319,106	149,182	62,319	N/A	N/A	105,757	102,932	28.00%	22.00%

* Companies marked N/A for question 8c responded that deposits are not considered retail revenue

9. Please provide the following information regarding deposits among low-income customers in 2018 and 2019, respectively:				
a. What percentage of customers who paid deposits were low-income customers?				
b. If possible, please identify the percentage of customers who paid deposits who are members of a highly impacted community or vulnerable population.				
	9a		9b	
	2018	2019	2018	2019
	% Low-Income	% Low-Income	% of deposits paid from highly impacted communities	% of deposits paid from highly impacted communities
Avista	31.00%	28.00%	57.00%	59.00%
Cascade	0.50%	0.37%	0.01%	0.01%
NW Natural	5.06%	3.13%	No answer	No answer
PacifiCorp*	5.50%	5.40%	5.50%	5.40%
PSE	8.50%	3.50%	50.40%	54.60%

* It is unclear if the percentage provided by PacifiCorp is for 9a or 9b

11. Please provide the following information regarding the late fees your company collected in 2018 and 2019, respectively:										
a. Please provide the total dollar amount collected in late fees for each year.										
b. How many residential customer accounts paid late fees each year?										
c. What percentage of retail revenue did your company derive from residential late fees each year?										
d. If late fees were no longer collected and were to be recovered in base rates instead, how much would residential bill increase based on your current approved rate spread? Please provide both a percentage increase and an average residential customer bill increase amount.										
	11a	11b	11c	11a	11b	11c	11d	11d	11d	11d
	2018			2019			2018		2019	
	Dollars	Counts	Percentage	Dollars	Counts	Percentage	Amount per bill	Percent	Amount per bill	Percent
Avista	Avista does not charge late fees									
Cascade	\$325,172	86,442	0.15%	\$322,147	84,102	0.13%	\$0.0783/cust	No answer	\$0.0704/cust	No answer
NW Natural	\$58,086	50,487	0.14%	\$60,100	51,580	0.13%	No answer	No answer	\$0.07/cust	0.10%
PacifiCorp	\$484,451	25,131	0.16%	\$502,078	25,149	0.16%	No answer	No answer	No answer	No answer
PSE	\$1,859,432	519,465	0.056%	\$1,655,745	501,745	0.049%	\$0.12 (Elec) \$0.06 (Nat Gas)	0.12% (Elec) 0.09% (Nat Gas)	No answer	No answer

12. Please provide the following information regarding late fees affecting low-income customers in 2018 and 2019, respectively:				
a. What percentage of late fees were charged to low-income customers each year?				
b. If possible, please identify the percent of customers charged late fees in each year who were members of a highly impacted community or vulnerable populations.				
	Question 12			
	12a		12b	
	2018	2019	2018	2019
Avista	Avista does not charge late fees.			
Cascade	1.291%	1.339%	0.512%	0.508%
NW Natural	1.65%	1.49%	No answer	
PacifiCorp	9.1%	9.3%	Same as 12a	
PSE	12.4%	12.7%	Vulnerable Populations 41% Highly Impacted Community 30%	Vulnerable Populations 41% Highly Impacted Community 30%

14. Please provide the following information regarding credit and collection:				
a. This question is a narrative response, please see the matrix for a summary of responses				
b. If applicable, the number of customers sent to collections in each of 2018 and 2019; and				
c. If applicable, the number of low-income customers who had account balances sent to collections in the year the customer received energy assistance.				
	Question 14			
	14b		14c	
	2018	2019	2018	2019
Avista	20,897	19,912	570	445
Cascade	4,577	4,045	23	25
NW Natural	1,127	1,055	33	18
PacifiCorp	5,083	4,378	258	208
PSE	68,424	58,346	1,691	1,399