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STATE OF WASH.
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May 4, 1999

The Office of the Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Attention: Carole J. Washburn
Executive Secretary

RE: Electric Companies – Rule Making – Chapter 480-100 WAC
Docket No. UE-990473

As requested in your letter of April 7, 1999, PacifiCorp is submitting our written comments pertaining to Docket No. UE-990473.

We appreciate the opportunity to submit written comments. In addition, we look forward to participating in the June 3, 1999 workshop where proposed changes to the rules will be discussed with all parties.

If you have any questions regarding our responses to your request, please contact me at (503) 813-6091.

Sincerely,


Carole Rockney, Manager
Tariff Policy

Attachment

**PACIFICORP COMMENTS ON
WASHINGTON ADMINISTRATIVE RULES
DATED MAY, 5, 1999**

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Comments on WAC 480-100-116 Responsibility for Delinquent Accounts:

The Company recommends revision of the rule changing the verbiage to apply only to residential customers. The Company also recommends limiting the number of times a residential customer may use prior obligation.

The Company believes the focus of the prior obligation rule is for residential service. In addition, the Company believes it is not the Commission's intent to allow customers to repeatedly use this remedy to avoid payment of bills.

Suggested Revisions to WAC 480-100-116 Responsibility for Delinquent Accounts:

A utility shall not refuse or discontinue service to an applicant or customer, who is not in arrears to the utility even though there are unpaid charges due from the premises occupied by the applicant or customer, on account of the unpaid bill of a prior tenant unless there is evidence of intent to defraud.

A utility may not permanently deny service to an applicant for residential service because of a prior obligation to the utility. However, a residential customer shall be limited to two uses of prior obligation in a twelve-month period.