



ATTORNEY GENERAL OF WASHINGTON

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March 19, 2021

SENT VIA WUTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: PacifiCorp d/b/a Pacific Power & Light Company's Proposed Revision to Tariff WN U-76 Schedule 119, Residential COVID-19 Bill Payment Assistance Program—Optional for Qualifying Customers,
Docket UE-210131

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in advance of the March 25, 2021, Open Meeting. These comments are in response to PacifiCorp d/b/a Pacific Power & Light Company's filing of proposed changes to the Company's tariff WN U-76, Schedule 119, Residential COVID-19 Bill Payment Assistance Program—Optional for Qualifying Customers. Public Counsel appreciates the in-depth discussion that PacifiCorp facilitated through its Low Income Advisory Committee and the Company's efforts to include the suggestions make by stakeholders.

In accordance with Order 01 in Docket U-200281, PacifiCorp has developed a bill payment assistance program that will provide relief for income-qualified customers with arrearages resulting from the economic crisis caused by the COVID-19 pandemic. Public Counsel believes this program will help PacifiCorp's most vulnerable customers reduce their arrearages and keep their power on during the continuing public health and economic crisis.

Public Counsel's Recommendation

Public Counsel recommends the Commission approve the revisions to Tariff WN U-76 Schedule 119, Residential COVID-19 Bill Payment Assistance Program—Optional for Qualifying Customers into PacifiCorp's tariff.

Customers can qualify for this program if their annual income is at or below 200 percent of the Federal Poverty Line. Customers may receive bill assistance equal to their arrearage amount, up to the maximum annual bill assistance grant of \$2,500, until funds for the program are exhausted.

To: Mark L. Johnson, Executive Secretary
Re: Docket UE-210131, PacifiCorp d/b/a Pacific Power & Light Company Proposed Revision to Tariff WN U-76 Schedule 119, Residential COVID-19 Bill Payment Assistance Program—Optional for Qualifying Customers
Date: March 19, 2021
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PacifiCorp will automatically qualify certain customers and apply grants to their accounts. The Company also has an outreach plan to prioritize customers with bills that are 91+ days past due, with high arrearage amounts, then they will reach out to customers with bills that are 60+ days past due and then 30+ days past due. PacifiCorp will be working with the community action agencies in their area to administer the program to customers who have not previously qualified for a low income assistance program.

Public Counsel appreciates PacifiCorp's efforts to develop and implement this program; however, we wish to strongly encourage the Company to develop a permanent and robust arrearage management program and other low income offerings. We expect that there will be long lasting impacts from the COVID-19 pandemic and economic crisis that will not be addressed by the dollars set aside for this short-term program. Public Counsel believes that it is important to develop comprehensive programs to help customers keep their power on in the event of future public or personal crises.

Additionally, Public Counsel encourages PacifiCorp to provide the data required under Order 01 in Docket U-200281 in advance of the May Open Meeting at which the Commission will evaluate the disconnection moratorium. Providing the data ahead of the May Open Meeting will allow the Commission and stakeholders to review and analyze the data to understand how debt assistance programs have assisted customers.

Again, we appreciate the opportunity to submit these comments. If you have any questions about this filing, please contact Stephanie Chase at (206) 491-7649, or via e-mail at Stephanie.Chase@ATG.WA.GOV.

Sincerely,

/s/ Lisa W. Gafken

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