**Q. Please state your name, business address, and present position with PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company).**

A. My name is Barbara A. Coughlin. My business address is 825 NE Multnomah Street, Suite 800, Portland, Oregon 97232. My present position is Director, Customer & Regulatory Liaison in the Customer Services Department.

**Qualifications**

**Q. Please describe your education and professional experience.**

A. I have worked in the gas and electric utility industry since 1978. I received a Legal Assistant Certificate from Marycrest College in 1991. From 1978 to 1997, I held various positions of increasing responsibility within the legal/regulatory department of Iowa-Illinois Gas and Electric, a predecessor company to MidAmerican Energy Company. In 1997, I was promoted to a customer services supervisor, and in 1999, I was promoted to customer services manager at MidAmerican Energy Company. I worked as manager of regulatory projects at PacifiCorp from 2006 through 2008, when I was promoted to my current position as Director of Customer & Regulatory Liaison.

**Purpose of Testimony**

**Q. What is the purpose of your testimony?**

A. The purpose of my testimony is to propose changes to Rule 6, *General Rules and Regulations*, and Schedule 300, *Charges as Defined by the Rules and Regulations*, of the Company’s Washington tariff schedules. The Company is proposing changes to some Schedule 300 charges after a review of the charges concluded a number of them do not align with the current actual costs. By aligning the charges with current actual costs, the costs would be paid by the cost-causer, rather than by the Company’s other customers. My testimony will first address the proposed wording changes to Rule 6, followed by the proposed changes to Schedule 300. The proposed changes to Rule 6 and Schedule 300 are included in Exhibit No.\_\_\_(JRS-2).

**Rule 6.I—Permanent Disconnection and Removal of Company Facilities**

**Q.** **Please describe the specific changes the Company is proposing to Rule 6.I?**

A. The Company proposes wording changes to Rule 6, section I, *Permanent Disconnection and Removal of Company Facilities*, to reflect the changes the Company is proposing to the Residential Service Removal Charge in Schedule 300. Specifically, the Company proposes to replace the reference to the Residential Service Removal Charge with a general reference to the removal charges listed in Schedule 300. The Company also proposes to make minor language changes to clarify how the Company calculates the actual removal costs that are billed to customers and to delete paragraph 5 of Section I.

**Q. Why is the Company proposing these changes?**

A. The proposed changes to Rule 6.I are necessary to align the language of the rule with the changes proposed to Schedule 300. As discussed later in my testimony, the Company proposes to eliminate the set fees that residential customers pay for requesting removal of service drops and meters and instead charge customers the actual costs for these removals. To be consistent with Schedule 300, Rule 6.I requires minor wording changes.

In addition, the Company proposes to explicitly state on Schedule 300 how the costs of permanent disconnection and removal of facilities are calculated, and align paragraphs 2 and 4 of Rule 6.I to the revised Schedule 300. These proposed changes use terminology that is similar to other language in the tariff (for example, in Rule 6.H) to ensure consistency and reduce confusion. With these clarifications to paragraphs 2 and 4, paragraph 5 is no longer needed.

**Schedule 300—Charges as Defined by the Rules and Regulations**

**Q. Please describe the changes the Company proposes to Schedule 300.**

A. The separate charges for residential underground and overhead service, and the separate charge for all other residential and non-residential services, are no longer necessary as the Company proposes to charge actual costs for all permanent disconnection and removal of facilities. As a result, the Company is proposing one charge titled Permanent Disconnection and Facilities Removal Charge for all removals under Rule 6.I.

The Company proposes to modify the amounts for the following charges:

* Permanent Disconnection and Facilities Removal Charge
* Reconnection Charge
* Unauthorized Reconnection/Tampering Charge

The Schedule 300 changes are further described below.

**Permanent Disconnection and Facilities Removal Charge**

**Q. Please describe the Permanent Disconnection and Facilities Removal Charge.**

A. The Permanent Disconnection and Facilities Removal Charge is used when a customer requests that the Company permanently disconnect service or when a customer elects to change electric service providers and the Company permanently removes electric facilities. If the facilities will no longer be used by the Company at the site, the Company will remove the facilities at the customer’s expense in accordance with Rule 6.I.

**Q. What is the current facilities removal charge?**

A. The current charge for removal of a residential overhead service drop and meter is $200.00. The current charge for removal of a residential underground service drop and meter is $400.00. The current charge for removal of all other residential service and non-residential service is actual costs less salvage.

**Q. What is the proposed change to the current facilities removal charges?**

A. The Company proposes to establish one permanent disconnection and facilities removal charge for all removals of service under Rule 6.I., which is a charge of actual removal cost, less salvage and depreciation.

**Q. Why is the Company proposing this change instead of requesting an increase to the fixed residential service removal charge?**

A. The Company reviewed its costs associated with removal of overhead and underground residential service drops and meters and determined that the current charges do not reflect the actual costs associated with performing this work. A removal charge that reflects actual costs ensures that the costs are borne by the cost-causer, rather than the Company’s other customers. Additionally, each removal has unique characteristics and the use of actual costs rather than fixed costs is more equitable to the Company, requesting customer, and all other Company customers. This approach is particularly important in Washington, where there is no allocated service territory.

**Reconnection Charge**

**Q. Please describe the reconnection charge.**

A. The reconnection charge is assessed when a customer has been disconnected due to default or non-payment of their energy bill and then requests reconnection of service.

**Q. What is the Company’s current reconnection charge?**

A. For service reconnections performed during normal business hours (Monday through Friday from 8:00 a.m. to 4:00 p.m., excluding holidays), the Company charges $25.00. For service reconnections requested to be performed on Monday through Friday from 4:00 p.m. to 7:00 p.m. (excluding holidays), the Company charges $50.00. For requests for service reconnection from 8:00 a.m. to 7:00 p.m. on weekends and holidays, the Company charges $75.00.

**Q. What are the Company’s proposed changes to the Reconnection Charge?**

A. For service reconnections performed during normal business hours (Monday through Friday from 8:00 a.m. to 4:00 p.m., excluding holidays), the Company proposes a reconnection charge of $50.00. For service reconnections requested to be performed on Monday through Friday from 4:00 p.m. to 7:00 p.m. (excluding holidays), the Company proposes a reconnection charge of $100.00. For service reconnections requested to be performed from 8:00 a.m. to 7:00 p.m. on weekends and holidays, the Company proposes a reconnection charge of $175.00.

The current and proposed reconnection charges are summarized below:

|  |  |  |
| --- | --- | --- |
|  | Current  Schedule 300  Charge | Proposed  Schedule 300  Charge |
| Reconnection  Monday-Friday, 8:00 a.m. to 4:00 p.m. (excluding holidays) | $25.00 | $50.00 |
| Reconnection  Monday-Friday, 4:00 p.m.to 7:00 p.m. | $50.00 | $100.00 |
| Reconnection  Weekends and holidays  8:00 a.m. to7:00 p.m. | $75.00 | $175.00 |

**Q. What is the Company’s current actual cost to reconnect service?**

A. The cost to reconnect service for customers during normal business hours is approximately $57.00. The cost to perform this work after hours ranges from approximately $305.00 on weekdays to approximately $360.00 on weekends and holidays.

Reconnection work is performed by a field specialist or a journeyman lineman, depending on when the reconnection work takes place. The reconnection work allocated between field specialists and journeyman linemen during the period July 1, 2011, through June 30, 2012, was:

* 87 percent is completed by field specialists and 13 percent is completed by journeyman linemen, Monday through Friday from 8:00 a.m. to 4:00 p.m. (excluding holidays).
* 31 percent is completed by field specialists and 69 percent is completed by journeyman linemen, Monday through Friday from 4:00 p.m. to 7:00 p.m. (excluding holidays).
* 100 percent is completed by journeyman linemen on weekends and holidays from 8:00 a.m. to 7:00 p.m.

Because the hourly rate for a journeyman lineman is higher than that of a field specialist, the cost to complete the after-hour reconnect is higher. Additionally, journeyman linemen charge a minimum of two hours for all after-hours reconnection work.

**Unauthorized Reconnection/Tampering Charge**

**Q. Please describe the Unauthorized Reconnection/Tampering Charge.**

A. This charge is assessed when a Company employee visits a site to perform an initial investigation for unauthorized reconnection of service. Unauthorized reconnection generally involves situations where a customer removes the device referred to as a “boot.” The boot is installed by the Company to discontinue the flow of energy to the meter at the time service is terminated for nonpayment of electric service. To re-energize the meter, the customer removes the boot, and the energy used by the customer is then recorded on the meter. The Company’s cost for investigating and resolving these situations is intended to be recovered through the Unauthorized Reconnection/Tampering Charge.

Unauthorized reconnection can also include situations where a customer installs equipment to bypass the meter or divert energy. Because the meter is bypassed, the energy that is used is not registered on the meter. Although less common, diversion situations can be complex, will typically take longer than one hour to investigate and require assistance from multiple employees.

**Q. What is the Company’s current Unauthorized Reconnection/Tampering Charge?**

A. The Unauthorized Reconnection/Tampering Charge is currently $75.00.

**Q. Why is the Company requesting an increase to the Unauthorized Reconnection/Tampering Charge?**

A.The Company proposes to increase the Unauthorized Reconnection/Tampering Charge to $180.00 to better reflect the actual average cost incurred by the Company to perform the initial investigation of the unauthorized reconnection.

**Q. What is the Company’s current actual average cost for investigating an unauthorized reconnection?**

A. The estimated cost of investigating an unauthorized reconnection is approximately $180.00. This cost only covers the initial investigation of the unauthorized reconnection performed by the journeyman meter man. Given that the costs associated with diversions can vary significantly based on the time and resources needed to fully investigate, the costs associated with investigating diversions are not included in the $180.00 estimate.

**Q. How many times was this charge assessed during the test period?**

A. The Company had 44 instances where the Unauthorized Reconnection/Tampering Charge was assessed in Washington during the period from July 1, 2011, through June 30, 2012. Given the difference between the current charge and the actual average cost, approximately $4,620.00 was not charged to the customer (cost causer) under the current Schedule 300.

**Q. Does this conclude your direct testimony?**

A. Yes.