



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

November 15, 2013

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

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

Re: Petition of PacifiCorp for Declaratory Order Regarding Interpretation of WAC 480-100-128(6), WAC 480-100-178, and WAC 480-100-128(3)

Dear Mr. King:

In accordance with WAC 480-07-370, WAC 480-07-395 and WAC 480-07-930, enclosed for filing are an original and twelve (12) copies of the above-mentioned petition.

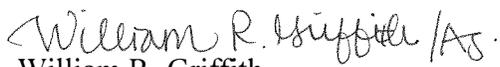
It is respectfully requested that all data requests be addressed in the following manner, with copies to the Company's counsel:

By Email (preferred): datarequest@pacificorp.com

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

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

Sincerely,


William R. Griffith
Vice President, Regulation

Enclosures

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER
& LIGHT COMPANY

Petitioner,

Petition for Declaratory Order Regarding
Interpretation of WAC 480-100-128(6),
WAC 480-100-178 and WAC 480-100-
128(3)

DOCKET UE-13_____

**PACIFICORP’S PETITION FOR
DECLARATORY ORDER**

I. INTRODUCTION

I In accordance with RCW 34.05.240, WAC 480-07-370, and WAC 480-07-930, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) petitions the Washington Utilities and Transportation Commission (Commission) for a declaratory order clarifying its interpretation of WAC 480-100-128(6) and WAC 480-100-178. Specifically, PacifiCorp requests that the Commission find that combining the first of four “past due” notices with regular billing statements to be in compliance with the Commission rules. Based on the facts and circumstances described herein, any other interpretation will result in approximately \$1.1 million in costs to PacifiCorp’s Washington retail customers for system upgrades with no material benefit. In addition, it is estimated that separate past due notice and billing statements will increase the Company’s Washington annual printing and postage costs by approximately \$200,000. Before PacifiCorp embarks on system changes to separate past due notices and billing statements as requested by Commission Consumer Protection Staff (Staff), PacifiCorp respectfully requests clarification as to the intent of the applicable rules.

2 PacifiCorp is an electrical company and public service company doing business in the state of Washington under RCW 80.04.010 and is subject to the jurisdiction of the Commission with regard to its public utility operations, retail rates, service and accounting practices. The Company also provides retail electricity service under the name Pacific Power in Oregon and California and under the name Rocky Mountain Power in the states of Utah, Wyoming, and Idaho. PacifiCorp’s principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon, 97232.

3 PacifiCorp’s name and address:

Washington Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
washingtondockets@pacificorp.com

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

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

By e-mail (preferred)

datarequest@pacificorp.com

By regular mail

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

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

4 The following statutes and rules may be at issue in this proceeding: RCW 30.04.240, WAC 480-07-370, WAC 380-07-930, WAC 480-100-128(3), WAC 480-100-128(6), and WAC 480-100-178.

II. BACKGROUND AND FACTS

A. Question Presented

5 In response to a consumer inquiry, Staff recently recorded 434 violations of
Commission rules against the Company regarding treatment of “past due” notices.¹ The
Company’s practice is to include the first of four past due notices with regular billing
statements. PacifiCorp has been combining past due notices with regular billing
statements, without incident or complaint, since 1995.

6 The Company interprets the Commission’s rules to allow the above-described
practice. To the contrary, Staff has directed the Company to alter its longstanding
practice and send past due notices in a communication separate from regular billing
statements. The Company interprets the rules to allow utilities to either issue (1) a past
due notice combined with billing statements or (2) separate past due notices and billing
statements. In any event, it is at the utility’s sole discretion as to how to process a past
due notice. Any change to the Company’s longstanding interpretation of the rules will be
at considerable expense to customers.

7 Accordingly, PacifiCorp submits the following question to the Commission for
consideration: Do the rules allow the Company to issue past due notices combined with
regular billing statements?

8 The Commission has primary jurisdiction over the subject matter of this
proceeding. The Commission may issue a declaratory order with respect to the
applicability to specified circumstances of a rule, order, or statute enforceable by the

¹ WAC 480-128(6) is one of the rules at issue in this Petition and is identified by the heading “Disconnection Notice Requirements.” This rule requires utilities to send two “disconnection” notices to customers. PacifiCorp refers to the first disconnection notice as a “past due” notice. Throughout the Company’s discussions with Staff on this issue, the first disconnection notice has been referred to as “past due” notice, “first” notice or “disconnection” notice.

agency.² WAC 480-100-128 and WAC 480-100-178 contain rules promulgated by the Commission under its general statutory authority found in RCW 80.01.040 and RCW 80.01.060. Therefore, the Commission has authority to order the declaratory relief requested.

B. Relevant Rules

9 WAC 480-100-178 contains billing requirements and payment date. Subsection (1) details the minimum information that is required to be included on customers' billing statements. Customer bills must be issued at intervals not exceeding two one-month billing cycles, show the amount due and payable, the date the amount becomes delinquent if not paid, the Company's business address, business hours, a toll-free telephone number and an emergency telephone number, current and previous meter readings, the current read date and total kilowatt hours used, the amount of kilowatt hours used for each billing rate, the applicable billing rates per kilowatt hour and the basic charge or minimum bill, amount of any municipal tax surcharges or respective percentage rates, identify when a bill has been prorated, detail method(s) of estimating in tariff, and identify determination of maximum demand if service is provided on a demand basis.³ Included as Attachment A to this Petition is a copy of PacifiCorp's standard Washington past due notice and billing statement with markers to indicate where each applicable section of the rule is shown on the bill.

10 WAC 480-100-128(6)(a) contains disconnection notice requirements, referencing a requirement to provide a first notice of disconnection, which the Company commonly refers to as "past due" notice. For customers with delinquent charges, utilities must

² WAC 480-07-390(1).

³ WAC 480-100-178(1)(a)-(j).

provide written notice of disconnection to customers by mail or personal delivery to the customer's address, with information on payment plan options and low-income assistance during winter months, and also include a disconnection date, all relevant information about the disconnection, including the cause, amount owed for regulated service and how to avoid disconnection, all relevant information about charges that may be assessed, and the Company's name, address and a toll-free telephone number.⁴ Attachment B to this Petition shows where on the Company's standard Washington past due notice and billing statement this information may be found.

III. ARGUMENT

A. **The Company has the Discretion to Issue Past Due Notices Included with Billing Statements**

11 The rules that are the subject of this declaratory order do not expressly or implicitly determine whether utilities may consolidate a past due notice with regular bills. Rules of statutory construction apply to administrative rules and regulations.⁵ An administrative rule is ambiguous if it can be reasonably interpreted in more than one way.⁶ Rules and regulations must be interpreted to ascertain and give effect to the underlying policy and intent.⁷ Rules and regulations must be given a rational, sensible interpretation.⁸ If ambiguous, the principles of statutory construction, legislative history and case law must be applied.⁹

12 The Commission promulgated the disconnect notice and billing statement rules

⁴ WAC 480-100-128(6)(a)(i)-(iv).

⁵ *State Department of Licensing v. Cannon*, 50 P. 3d 627, 636 (2002).

⁶ *Id.*

⁷ *Id.*

⁸ *Id.*

⁹ *Id.* at 637.

under its general statutory authority found in RCW 80.01.040 and RCW 80.04.160.

Importantly, the Commission did not address a specific directive from the Washington Legislature. A review of relevant Commission rulemakings reveals no discussion about the method of sending past due notices to customers.¹⁰

13 The intent of the rules is ensure that the past due notices contain specific information. The rules do not specify how or in what form the past due notices would be communicated. The form and method of communication is at the discretion of the utility. The Company's interpretation of the rules is rational and sensible, and is correct. In the absence of express rule language, the utility is left with discretion as to whether to issue past due notices included with billing statements, as long as the billing statements and past due notices contain the information required by WAC 480-100-178 and WAC 480-100-128(6)(a). As demonstrated by Attachments A and B to this Petition, PacifiCorp meets the requirements of the rules by showing all required information.

14 Further, as part of its customer service offerings, the Company's regular disconnection process includes notification to customers using a variety of methods including mailed bills, mailed notices, a courtesy outbound call and a courtesy 48 hour notice hand-delivered to the customer's premises. The Company implemented the courtesy notices as a business decision in efforts to afford customers additional opportunities to become current on payments and avoid disconnection. The Commission's rules allow for this flexibility.

¹⁰ See, General Order No. R-482, Docket No. UE-990473 (May 3, 2001). The Commission repealed many of its previous rules related to customer service requirements for electric utilities and promulgated new rules.

B. Recent Facts and Circumstances Indicate a Need for Direction from the Commission

15 On August 20, 2013, a Staff analyst found the Company in violation of the Commission's billing statement and disconnection notice rules and issued a directive to make the necessary corrections to avoid further enforcement action. PacifiCorp sought review of this finding from the Consumer Protection Manager, who upheld the analyst's conclusions September 6, 2013. The issue was further discussed through the Company's annual review of complaints and violations with the Assistant Director and Consumer Protection Manager, held September 12, 2013. During the meeting, Staff indicated it would seek a "verbal interpretation" from the attorney general's office. PacifiCorp received an email from the Consumer Protection Manager dated October 4, 2013, indicating an oral opinion from the attorney general's office agreed with Staff's interpretation. Staff then requested information on when the Company could implement the change.

16 Staff's direction appears to be based on its review of one customer's inquiry, rather than a review of the Company's longstanding practice and the applicable rules. The Company reviewed its records of customer complaints submitted to Staff prior to the complaint that triggered Staff's direction and found no other instances of customers indicating confusion with the format of past due notices. The Company's records show at least ten instances since 2005 where Staff was provided copies of combined past due notices and regular billing statements for review as part of Staff's investigation of customer inquiries or complaints. A summary of the ten instances is included as Attachment C. Staff did not object to this practice during any of those instances even

though the past due notices and billing statements were combined and the rules have remained the same. PacifiCorp understands Staff conducts thorough investigations into complaints to ensure utility compliance with the Commission's rules. To find PacifiCorp's practice of including past due notices with regular billing statements at this time represents a reversal of Staff's earlier position. Staff has offered no explanation for this unexpected reversal. Such a reversal and lack of evidentiary basis for directing the Company to modify its business practice also raises fundamental due process concerns.

17 Staff's primary concern focuses on minimizing confusion to customers and indicates that a separate notice of past due amounts will avoid confusion for customers. However, there is no basis for Staff's position, and objective data supports the Company's position. For example, a recent study published by Market Strategies¹¹ International ranked Pacific Power number one among 83 utilities surveyed nationwide for ease of understanding bills for residential customers. An excerpt from Market Strategies International's report is included with this Petition as Attachment D.

18 Staff's insistence that the Company provide past due notices separate from billing statements will require a significant system change at Washington customers' expense. The Company's current customer service system was programmed to issue consolidated past due notices following acceptance of the billing practice by key stakeholders. To separate past due notices and billing statements will require a system change at an estimated cost of approximately \$1.1 million. In addition to this cost, the separate past due notice and billing statements will increase the Company's Washington annual printing and postage costs by approximately \$200,000.

¹¹ Market Strategies International is a leading customer satisfaction market research firm in the United States electric utility industry.

19

Staff's direction to the Company to begin issuing past due notices in a separate communication from the regular billing statement is arbitrary and capricious and is devoid of any meaningful due process. An administrative decision is arbitrary and capricious if it is willful and unreasoning and disregards facts and circumstances.¹² At a minimum, due process requires notice and an opportunity to be heard or defend before a competent tribunal in a proceeding adapted to the nature of the case.¹³ Notice must be reasonably calculated to inform the affected party and provide an opportunity to object.¹⁴ The opportunity to be heard must be meaningful in time and manner.¹⁵ To determine the appropriate due process depends upon the balancing of the private interest involved, the risk of erroneous deprivation through the procedures involved and the value of additional procedures, and the government's interest.¹⁶ Due process is a flexible concept and the procedures required depend on the circumstances of the situation.¹⁷ Neither the Commission's enabling statutes nor the Commission's rules provide a mechanism for Staff to unilaterally require the Company to modify its practices in situations where Staff believes the Company to be out of compliance. Staff's determinations are not the Commission's final decision and the Company has not been provided adequate opportunity to be heard, thus raising questions about the adequacy of due process.

C. The Company has Interpreted the Rules in a Manner that is Cost Effective and Efficient for Customers

20

Because the rules do not expressly state that past due notices must be issued as a

¹² *Eggert v. Director, Employment Security Department*, 558 P. 2d 1368, 1370 (1976).

¹³ *In re Hendrickson*, 12 Wash.2d 600, 605 (1942); *Johnson v. Wash. Dept. of Fish & Wildlife*, 175 Wash.App. 765, 772 (2013).

¹⁴ *Johnson v. Wash. Dept. of Fish & Wildlife*, 175 Wash.App. 765, 772 (2013).

¹⁵ *Id.* at 773.

¹⁶ *Id.*

¹⁷ *Id.*

stand-alone document, it is up to each utility to determine the practice that best suits the needs of its customers. A long-standing principle of administrative law holds that public utility commissions are not the financial managers of utilities and may not substitute their judgment for business decisions.¹⁸

21 The Company uses a variety of customer service tools not expressly contained in the rules as part of a comprehensive program for providing good customer service, which is integral to utility business. For example, the rules do not specify payment methods a customer may use, other than pay stations. However, for customer convenience, PacifiCorp offers a multitude of payment options, such as checks or money orders sent through U.S. mail, online payments, and pay by telephone. Also not expressly stated in the rules, but offered for customers' convenience, are programs such as Landlord Link to conveniently stop and start service at rental properties, calls with updated information for customers experiencing an outage, and a website providing Company information and services. Although these services are not prescribed in the rules, the Company has received support from Staff on offering these services.

22 The Company established its current billing practice of consolidating past due notices with billing statements when it converted to a new customer service system in 1995 to address customer confusion and reduce monthly billing costs. In 2003, the Company redesigned its billing statement and notices, and at that time sought feedback from several stakeholders including employees, customers, and utility commission staff. Staff had the opportunity to provide feedback on the Company's consolidated past due

¹⁸ *Pacific Telephone & Telegraph Co. v. Whitcomb, Home Telephone & Telegraph Co. of Spokane v. Denney*, 12 F.2d 279, 285 (1926); *State Public Utilities Commission ex rel. City of Springfield v. Springfield Gas & Electric Co.*, 125 N.E. 891, 894 (1920); *Logan v. Public Utilities Commission of Utah*, 296 P. 1006, 1008 (1931).

notices at that time; however, the Company has no record of any objections.

23 Based on efficiency and feedback, the Company has continued to execute its
billing practices in a cost-effective and efficient manner, while meeting the requirements
of the applicable rules. The Commission or Staff has never expressed concern about
PacifiCorp's interpretation of the applicable rules until the circumstances of this single
customer inquiry.

D. Issuance of a Declaratory Order is Appropriate

24 RCW 34.05.240(1) and WAC 480-07-930 confer authority upon the Commission
to enter a declaratory order upon showing that uncertainty necessitating resolution exists,
there is actual controversy arising from the uncertainty so that a declaratory order will not
be merely advisory, the uncertainty adversely affects PacifiCorp, and the adverse effect
on PacifiCorp outweighs the adverse effects on other or the general public that may arise
from the requested order.¹⁹

1. Uncertainty Necessitating Resolution Exists

25 The uncertainty to be resolved by this Petition is whether PacifiCorp's
longstanding inclusion of the first of four past due notices with regular billing statements
is consistent with the Commission's rules. Staff disagrees with PacifiCorp's well-
established practice, which creates uncertainty for PacifiCorp. This uncertainty
necessitates resolution by the Commission so that PacifiCorp can determine whether
significant changes to its customer service system must be implemented, which will
result in significant cost impacts for customers.

¹⁹ RCW 34.05.240(1)(a)-(d). RCW 34.05.240(1)(e) requires petitions for declaratory orders to comply with any such requirements established by the Commission. The Commission has not established any further requirements.

2. Actual Controversy Arising from the Uncertainty Exists Such That a Declaratory Order will not be Merely Advisory

26 As discussed above, there is actual controversy such that a declaratory order will not be merely advisory.

3. The Uncertainty Adversely Affects PacifiCorp

27 Staff has recorded rule violations against the Company for its past due notice practices and continues to record such violations for various customer inquiries. Staff has indicated it may initiate enforcement action against the Company.

4. The Adverse Effect of Uncertainty on PacifiCorp Outweighs Any Adverse Effects on Others or the General Public that May Likely Arise from the Order Requested

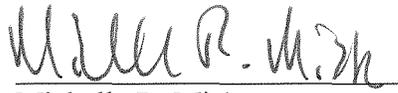
28 Issuing the order requested by PacifiCorp will not result in any adverse effects to others or the general public. PacifiCorp, its customers, and the public will benefit from obtaining a Commission ruling on this issue.

IV. CONCLUSION

29 To avoid unnecessary costs and confusion for customers, the Company requests the Commission issue a declaratory order finding PacifiCorp's practice of issuing the first of four past due notices with regular billing statements in compliance with the rules. PacifiCorp's ultimate concern is ensuring it is in compliance with Commission rules. The rules are written in such a way to allow for utilities to choose the most efficient and cost-effective manner in meeting the intent of the rules. In this case, PacifiCorp has traditionally combined the first of four the past due notices with the regular billing statement. The Company seeks the Commission's interpretation of the applicable rules

before incurring significant costs for customers with no material benefit.

Respectfully submitted this 15th day of November, 2013,

By: 
Michelle R. Mishoe
Senior Counsel
Pacific Power
825 NE Multnomah Street, Suite 1800
Portland, OR 97232

Attachment A

WAC 480-100-178 Requirements in PacifiCorp's
Standard Washington Combined Past Due Notice &
Billing Statement

JOHN Q CUSTOMER
1234 MAIN ST
YAKIMA WA 12345-0001

Questions about your bill: **1-888-221-7070**
24 hours a day, 7 days a week
www.pacificpower.net

BILLING DATE: **Aug 12, 2013**
ACCOUNT NUMBER: **12345678-001 0**
DATE DUE: **Aug 23, 2013**
AMOUNT DUE: **\$238.06**

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.

Your Balance With Us

Previous Account Balance	94.72
Payments/Credits	0.00
Past Due Amount	94.72
New Charges	+143.34
Current Account Balance	\$238.06

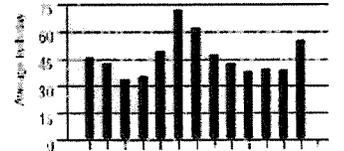
You Must Act Now to Avoid Shut-Off!

Your Electric Service Past Due Amount of **\$94.72** must be received by **Aug 23, 2013** to avoid shut-off.

Other ways to avoid Shut-off are shown at the end of this billing statement

Remember: Your New Charges of **\$143.34** are still due by **Aug 28, 2013.**

Historical Data - ITEM 3



2012 A S O N D J E M A M J J A 2013

Your Average Daily kWh Usage by Month

PERIOD ENDING	AUG 2013	AUG 2012
Avg Daily Temp	76	75
Total kWh	1685	1370
Avg kWh per Day	56	46
Cost per Day	\$4.75	\$3.79

Payments Received

No payments have been received since your last billing statement

Detailed Account Activity

ITEM 1 -ELECTRIC SERVICE

1234 Main St Yakima WA
Residential Schedule 16

METER NUMBER	SERVICE PERIOD		ELAPSED DAYS	METER READINGS		METER MULTIPLIER	AMOUNT USED THIS MONTH
	From	To		Previous	Current		
12345678	Jul 10, 2013	Aug 9, 2013	30	41712	43397	1.0	1,685 kWh

Next scheduled read date: 08-02. Date may vary due to scheduling or weather.

NEW CHARGES - 08/13

	UNITS	COST PER UNIT	CHARGE
Basic Charge - Single Phase			6.00
Energy Charge Block 1	600 kWh	0.0623200	37.39

Write account number on check & mail to: Pacific Power, PO Box 26000, Portland, OR 97256-0001

RETAIN THIS PORTION FOR YOUR RECORDS
RETURN THIS PORTION WITH YOUR PAYMENT

PACIFIC POWER

PO BOX 25308
SALT LAKE CITY UT 84125

ACCOUNT PAST DUE

Change of Address or Phone?
Check here and provide information on back.

JOHN Q CUSTOMER
1234 MAIN ST
YAKIMA WA 12345-0001

WRITE ACCOUNT NUMBER
ON CHECK & MAIL TO:

PACIFIC POWER
PO BOX 26000
PORTLAND OR
97256-0001

Account Number: **12345678-001 0**
Date Due: **Aug 23, 2013**

AMOUNT DUE: \$238.06

Please enter the amount enclosed.

Questions about your bill:
1-888-221-7070

If meter read is estimated, a message noting the estimation is displayed here.
178(1)(i)

178(1)(d)



Questions about your bill: 1-888-221-7070 www.pacificpower.net

178(1)(d)

BILLING DATE: Aug 12, 2013 ACCOUNT NUMBER: 12345678-001 0 DATE DUE: Aug 23, 2013 AMOUNT DUE: \$238.06

Energy Charge Block 2	1,085 kwh	0.0969900	105.23
Bill Assistance Program			0.68
B P A Columbia River Benefits (Washington State Utility Tax \$0.94)	1,685 kwh	-0.0041000	-6.91
Late Payment Charge		0.0100000	0.95
Total New Charges			143.34

If the bill is prorated, the prorated charges are itemized in the bill detail section.
178(1)(h)

All applicable municipal tax surcharges and percentage rates are itemized in the bill detail section.
178(1)(g)

THE ELECTRIC SERVICE AT THE FOLLOWING ADDRESS (ES) IS IN DANGER OF BEING DISCONNECTED DUE TO NON-PAYMENT. THE AMOUNT (\$) LISTED BELOW DOES NOT REFLECT ENERGY ASSISTANCE PROGRAM PLEDGES YOU MAY BE RECEIVING:

SERVICE TYPE	SERVICE ADDRESS	SERVICE DESCRIPTION	AMOUNT
Electric Service	1234 Main St Yakima, WA 12345-001	Residential	\$94.72

YOU CAN AVOID SHUT-OFF: Your Electric Service will be disconnected according to utility commission rules, unless you take one of the following steps by Aug 23, 2013.

1. PAY YOUR ELECTRIC SERVICE PAST DUE AMOUNT OF \$94.72; or
2. MAKE SATISFACTORY PAYMENT ARRANGEMENT with Pacific Power; or.
3. NOTIFY PACIFIC POWER OF A MEDICAL EMERGENCY in the home. If you qualify for a medical emergency, you will be required to submit both written certification from a qualified medical professional that shut-off would create or aggravate a medical condition for you or a member of your household and a minimum of 10% of your delinquent account balance within 5 business days. You will then be eligible for payment arrangements for the remaining account balance.

If after contacting Pacific Power, you feel that the decision to shut off your electric service is wrong, you may appeal to the Washington Utilities and Transportation Commission, whose toll-free telephone number is 1-800-562-6150, or you may write or go to the Consumer Assistance Section, Utilities and Transportation Commission, Chandler Plaza building, 1300 Evergreen Park Drive South, Olympia, Washington 98504, Mail Stop FY-11.

A CHARGE OF (\$15) may be made if it is necessary to send Company personnel to your premises for collection purposes.

IMPORTANT: If your service is disconnected, you may be required to PAY A DEPOSIT IN ADDITION TO A RECONNECTION CHARGE. If your power is disconnected, Pacific Power's charges and times for reconnecting service are as follows: weekdays from 8 a.m. to 4 p.m. (\$25) and 4 p.m. to 7 p.m. (\$50), weekends and holidays from 8 a.m. to 7p.m. (\$75). The Company will make a reasonable attempt to switch on power for

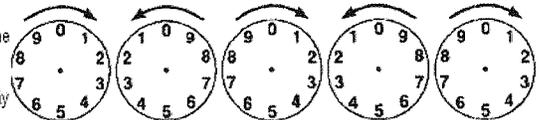
178(1)(d)

New Mailing Address or Phone?

Please print your new information below and check the box on the reverse side of this Payment Stub. Thank you.

ACCOUNT NUMBER: 12345678-001 0

If you feel your meter read is in correct, draw lines where the hands appear on the dials or for digital meters record the numbers shown on the display



LAST FIRST M.I.

NEW STREET ADDRESS

CITY

ST ZIP TELEPHONE NUMBER





Questions about your bill: 1-888-221-7070 www.pacificpower.net

BILLING DATE: **Aug 12, 2013** ACCOUNT NUMBER: **12345678-001 0** DATE DUE: **Aug 23, 2013** AMOUNT DUE: **\$238.06**

an Applicant or Customer within 24 hours after the Company is notified that all required charges have been paid and any required inspections are finalized.

WINTER PAYMENT PLAN: Qualifying income-eligible households may avoid termination of service or have service reconnected during the winter period of November 15 through March 15, by establishing a Winter Payment Plan. To find out if you are eligible for the Winter Payment Plan, please contact one of the Energy Assistance Agencies listed below:

Blue Mountain Action Council (509)529-4980

OIC of Washington (509)248-6751

Northwest Community Action Center (509)865-7630

You will be required to certify your household income for the prior 12 months with the agency and apply for energy assistance and low-income weatherization services. The agency will determine if you are eligible for the Winter Payment Plan and notify Pacific Power. If you are eligible, you must agree to pay all amounts due, including future monthly charges, by the following October 15. The minimum monthly amount you will pay on the Winter Payment Plan during the winter months will be 7 percent of your monthly income, plus 1/12th of the current billing, although you may elect to pay a higher amount. Failure to make your minimum monthly payment may result in service being disconnected.

Please contact us at 1-888-221-7070 to learn more.

Looking for ways to pay?

Visit pacificpower.net/pay for all your options. You can choose to pay online securely with your bank account, pay at a pay station in your community, or pay by phone with a credit/debit card. For details, call 1-888-221-7070.



Questions about your bill: 1-888-221-7070 www.pacificpower.net

BILLING DATE: Aug 12, 2013

ACCOUNT NUMBER: 12345678-001 0

DATE DUE: Aug 23, 2013

AMOUNT DUE: \$238.06

Attachment B

WAC 480-100-128(6)(a) Requirements in
PacifiCorp's Standard Washington Combined Past
Due Notice & Billing Statement

JOHN Q CUSTOMER
1234 MAIN ST
YAKIMA WA 12345-0001

128(6)(a)(iv)

Questions about your bill: 1-888-221-7070
24 hours a day, 7 days a week
www.pacificpower.net

BILLING DATE: Aug 12, 2013
ACCOUNT NUMBER: 12345678-001 0
DATE DUE: Aug 23, 2013
AMOUNT DUE: \$238.06

128(6)(a)

128(6)(a)(ii)

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.

128(6)(a)(ii)

Historical Data - ITEM 3

Your Balance With Us

Previous Account Balance	94.72
Payments/Credits	0.00
Past Due Amount	94.72
New Charges	+143.34
Current Account Balance	\$238.06

You Must Act Now to Avoid Shut-Off!

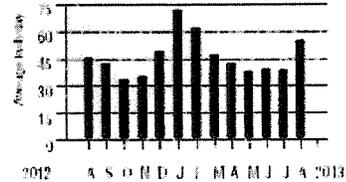
Your Electric Service Past Due Amount of \$94.72 must be received by **Aug 23, 2013** to avoid shut-off.

Other ways to avoid Shut-off are shown at the end of this billing statement

128(6)(a)(i)

Remember: Your New Charges of \$143.34 are still due by **Aug 28, 2013.**

128(6)(a)(ii)



Payments Received

No payments have been received since your last billing statement

Detailed Account Activity

ITEM 1 -ELECTRIC SERVICE 1234 Main St Yakima WA
Residential Schedule 16

METER NUMBER	SERVICE PERIOD From To	ELAPSED DAYS	METER READINGS		METER MULTIPLIER	AMOUNT USED THIS MONTH
			Previous	Current		
12345678	Jul 10, 2013 Aug 9, 2013	30	41712	43397	1.0	1,685 kwh

Next scheduled read date: 08-02. Date may vary due to scheduling or weather.

NEW CHARGES - 08/13	UNITS	COST PER UNIT	CHARGE
Basic Charge - Single Phase			6.00
Energy Charge Block 1	600 kwh	0.0623200	37.39

Write account number on check & mail to: Pacific Power, PO Box 26000, Portland, OR 97256-0001

RETAIN THIS PORTION FOR YOUR RECORDS
RETURN THIS PORTION WITH YOUR PAYMENT

128(6)(a)(iii)

Late Payment Charge for Washington
A late payment charge of 1% may be charged on the delinquent balance per month.



PO BOX 25308
SALT LAKE CITY UT 84125

128(6)(a)(iv)

ACCOUNT PAST DUE

128(6)(a)

WRITE ACCOUNT NUMBER ON CHECK & MAIL TO:

JOHN Q CUSTOMER
1234 MAIN ST
YAKIMA WA 12345-0001

PACIFIC POWER
PO BOX 26000
PORTLAND OR
97256-0001

Change of Address or Phone?
Check here and provide information on back.

Account Number: 12345678-001 0
Date Due: Aug 23, 2013

AMOUNT DUE: \$238.06

Please enter the amount enclosed.

128(6)(a)(iv)

Questions about your bill:
1-888-221-7070



Questions about your bill: 1-888-221-7070 www.pacificpower.net

128(6)(a)(iv)

BILLING DATE: Aug 12, 2013 ACCOUNT NUMBER: 12345678-001 0 DATE DUE: Aug 23, 2013 AMOUNT DUE: \$238.06

Energy Charge Block 2	1,085 kwh	0.0969900	105.23
Bill Assistance Program			0.68
B P A Columbia River Benefits	1,685 kwh	-0.0041000	-6.91
(Washington State Utility Tax \$0.94)			
Late Payment Charge		0.0100000	0.95
Total New Charges			143.34

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:

SERVICE TYPE	SERVICE ADDRESS	SERVICE DESCRIPTION	AMOUNT
Electric Service	1234 Main St Yakima, WA 12345-0001	Residential	\$94.72

128(6)(a)(ii)

YOU CAN AVOID SHUT-OFF: Your Electric Service will be disconnected according to utility commission rules, unless you take one of the following steps by Aug 23, 2013.

128(6)(a)(i)

1. PAY YOUR ELECTRIC SERVICE PAST DUE AMOUNT OF \$94.72; or
2. MAKE SATISFACTORY PAYMENT ARRANGEMENT with Pacific Power; or.
3. NOTIFY PACIFIC POWER OF A MEDICAL EMERGENCY in the home. If you qualify for a medical emergency, you will be required to submit both written certification from a qualified medical professional that shut-off would create or aggravate a medical condition for you or a member of your household and a minimum of 10% of your delinquent account balance within 5 business days. You will then be eligible for payment arrangements for the remaining account balance.

If after contacting Pacific Power, you feel that the decision to shut off your electric service is wrong, you may appeal to the Washington Utilities and Transportation Commission, whose toll-free telephone number is 1-800-562-6150, or you may write or go to the Consumer Assistance Section, Utilities and Transportation Commission, Chandler Plaza building, 1300 Evergreen Park Drive South, Olympia, Washington 98504, Mail Stop FY-11.

A CHARGE OF (\$15) may be made if it is necessary to send Company personnel to your premises for collection purposes.

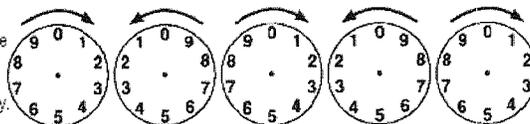
128(6)(a)(iii)

IMPORTANT: If your service is disconnected, you may be required to PAY A DEPOSIT IN ADDITION TO A RECONNECTION CHARGE. If your power is disconnected, Pacific Power's charges and times for reconnecting service are as follows: weekdays from 8 a.m. to 4 p.m. (\$25) and 4 p.m. to 7 p.m. (\$50), weekends and holidays from 8 a.m. to 7p.m. (\$75). The Company will make a reasonable attempt to switch on power for

New Mailing Address or Phone?

Please print your new information below and check the box on the reverse side of this Payment Stub. Thank you.

If you feel your meter read is incorrect, draw lines where the hands appear on the dials or for digital meters record the numbers shown on the display.



ACCOUNT NUMBER: 12345678-001 0

LAST FIRST M.I.

NEW STREET ADDRESS

CITY

ST ZIP TELEPHONE NUMBER





Questions about your bill: 1-888-221-7070 www.pacificpower.net

128(6)(a)(iv)

BILLING DATE: Aug 12, 2013 ACCOUNT NUMBER: 12345678-001 0 DATE DUE: Aug 23, 2013 AMOUNT DUE: \$238.06

an Applicant or Customer within 24 hours after the Company is notified that all required charges have been paid and any required inspections are finalized.

128(6)(a)

WINTER PAYMENT PLAN: Qualifying income-eligible households may avoid termination of service or have service reconnected during the winter period of November 15 through March 15, by establishing a Winter Payment Plan. To find out if you are eligible for the Winter Payment Plan, please contact one of the Energy Assistance Agencies listed below:

- Blue Mountain Action Council (509)529-4980
- OIC of Washington (509)248-6751
- Northwest Community Action Center (509)865-7630

You will be required to certify your household income for the prior 12 months with the agency and apply for energy assistance and low-income weatherization services. The agency will determine if you are eligible for the Winter Payment Plan and notify Pacific Power. If you are eligible, you must agree to pay all amounts due, including future monthly charges, by the following October 15. The minimum monthly amount you will pay on the Winter Payment Plan during the winter months will be 7 percent of your monthly income, plus 1/12th of the current billing, although you may elect to pay a higher amount. Failure to make your minimum monthly payment may result in service being disconnected.

Please contact us at 1-888-221-7070 to learn more.

128(6)(a)(iv)

Looking for ways to pay?

Visit pacificpower.net/pay for all your options. You can choose to pay online securely with your bank account, pay at a pay station in your community, or pay by phone with a credit/debit card. For details, call 1-888-221-7070.



Questions about your bill: 1-888-221-7070 www.pacificpower.net

BILLING DATE: **Aug 12, 2013** ACCOUNT NUMBER: **12345678-001 0** DATE DUE: **Aug 23, 2013** AMOUNT DUE: **\$238.06**

Attachment C

Consumer Staff Review of Combined Past Due
Notices and Regular Billing Statements Since 2005

Consumer Staff Review of Combined Past Due Notices and Regular Billing Statements Since 2005

Case #	Complaint Issue	Date Notice Provided	Comments
105627	Pending disconnection for nonpayment of deposit	02/04/09	
107838	Service disconnected for nonpayment	11/19/09	
106850	Pending disconnection for nonpayment	07/08/09	Case reviewed by Consumer Staff Manager and Director
105561	Pending disconnection for nonpayment	02/05/09	
107475	Pending disconnection for fraud	09/23/09	Case reviewed by Consumer Staff Manager
104815	Pending disconnection for access	10/31/08	
102127	Pending disconnection for nonpayment	11/26/07	
96592	Disputed bill	NA	Customer provided copy of past due notice
95303	Disputes enrollment in paperless billing	10/31/05	
92647	Service disconnected for nonpayment	02/17/05	

Attachment D

Excerpt from Market Strategies International's
Report

PacifiCorp 2013 Residential Customer Satisfaction Study

September 2013

ISO 20252 Certified

Residential Billing

Pacific Power

% Total Good Job



Rocky Mountain Power

% Total Good Job



■ DK/REF ■ %0-4 ■ %5 ■ %6-7 ■ %8-10

Pacific Power 2011 n=500, 2013 n=300; Rocky Mountain Power 2011 n=500, 2013 n=300 Q42-Q43

An arrow indicates a significant change from 2011. There are no significant differences between Pacific Power and Rocky Mountain Power.

Residential Benchmarking

Billing

Providing accurate bills	MSI		Peer	
	Score (%6-10)	National Score (%6-10)	Group Score (%6-10)	Quartile
2013 Pacific Power	95	83	88	1
2011 Pacific Power	89	81	85	1
2013 Rocky Mountain Power	97	83	88	1
2011 Rocky Mountain Power	92	81	85	1

Having bills that are easy to understand	MSI		Peer	
	Score (%6-10)	National Score (%6-10)	Group Score (%6-10)	Quartile
2013 Pacific Power	96	83	86	1
2011 Pacific Power	92	83	87	1
2013 Rocky Mountain Power	94	83	86	1
2011 Rocky Mountain Power	91	83	87	1