WA UE-100749/PacifiCorp October 21, 2010 EP Data Request 27

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In his direct testimony, Mr. William Griffith proposes recertifying customers for the Company's low-income bill assistance program only every other year (as opposed to the current annual recertification). *See, Testimony of William R. Griffith, p. 7.* Please provide a thorough rationale for the Company's proposal including, but not limited to, any cost-benefit analysis PacifiCorp might have performed supporting its proposal.

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The Company's proposal is focused on decreasing the program's administrative costs in order to provide more benefits to customers that are in need of assistance. As noted on page 7 of Mr. Griffith's testimony, the current annual certification fee is \$48 per household and results in a total annual cost to the program of \$214,800. The administrative costs in two of PacifiCorp's other jurisdictions that offer a low-income bill assistance program are considerably lower. California previously had a certification fee of \$12 per household but has since moved to a self-certification process that is done every other year and thereby eliminates the \$12 per household fee. In Utah, the annual administrative cost for the entire program in the past program year was \$20,110.

The Company reviewed the current administrative costs for this program in Washington and determined that moving to a bi-annual recertification process will provide benefits to more customers in need. Under the current program, over a two-year period, approximately \$429,600 will be spent certifying low-income customers. The average savings realized by participants in the past program year was \$222. Based on this average annual discount, the savings in administrative costs would allow more than 900 additional customers to receive assistance.

PREPARER: Becky Eberle

SPONSOR: Becky Eberle