

Date: September 30, 1999
To: All Interested Parties
From: Carole Rockney, Robin Cross and Gene Cardon - PacifiCorp
Subject: Comments on Proposed Washington Rule Changes - Rules 480-90 & 100

Thank you for the opportunity to provide comments on the discussion draft of Electric Operation Rules in Docket UE-990473. This is a significant undertaking given the complexity of the issues and the length of time the current rules have been in effect.

Our comments today will focus on the more substantive issues. We believe that once the substantive issues are fully debated it would then be appropriate to focus on wording changes, reordering paragraphs and other editorial tasks. We also reserve the right to make further comments as we identify additional changes that have been made to the newest version of the rules.

Look forward to seeing you all on October 14 and 15.

CONSUMER RULES

WAC 480-100-041 (4)

The Company believes that providing applicants with both the annual high and low usage would be informative to applicants and would not be as burdensome as providing this information for each quarter.

WAC 480-100-046

(2)(d) PacifiCorp believes that the utility, not the customer, should determine what form of identification would establish "proof of identification." The rule as written is contrary to the way business is conducted throughout the state of Washington and would subject the Company to even greater business risk than what currently exists.

(3) This seems unrealistic. A service date is not necessarily available at the time of application. For example, where a customer needs to obtain a right of way, permits or inspections, the service date would not be available since it would depend on fulfilling these requirements.

(13) The preferred method by the Company is to apply the deposit plus interest to the customer's account. This is a cost saving measure.

WAC 480-100-051(10)

PacifiCorp believes that 6 business days is a reasonable length of time to pay a security deposit after the customer is notified of such deposit and believes that allowing until the ninth business day if notice is mailed outside the state of Washington adds confusion and unnecessarily disrupts current processes.

WAC 480-100-056(9)

We believe the clarification that the prior obligation pertains to amounts unpaid at the time of disconnection for nonpayment is helpful. The Company would also like to continue to explore limiting the use of prior obligation, for example to once every 12 months, given that Washington customers represent 8% of our total customer base but Washington write-offs are 16% of total Company write-offs. Should prior obligation be continued in Washington, we would also recommend the use of prior obligation be limited to residential customers.

WAC 480-100-071

(1) We propose that the customer give the Company five days notice prior to disconnection date. It is unreasonable to expect the Company to provide same day disconnect. In addition, the Company should not be required to back date a close date.

Same comment as WAC 480-100-051(10) above with regard to not providing different time frames for mailing depending upon where the item is mailed from.

WAC 480-100-xx3

The Company would like to discuss this issue further to ensure that the intent is not to obligate the Company to reconnect service without payment.

WAC 480-100-096

With regard to this section of the rules, PacifiCorp would like to discuss whether it would be possible to differentiate between complaints vs. a billing inquiry. Some of the "complaints" that we currently receive are more like questions or requests for information. We would also like to suggest establishing some type of time requirement, for example 10 calendar days, within which the utility could expect to hear back from the Commission in order to resolve complaints in a timely manner.

WAC 480-100-101

(g) Showing the taxes and any tax percentage rate that the taxes are computed from is a reasonable requirement. Requiring the Company to total all taxes and display this amount would result in significant programming effort. We would like an opportunity to explore this further with our Customer Service System programmers to determine the

feasibility of this requirement.

(h) We are discussing the ability to comply with this requirement with our Customer Service System programmers.

(j) PacifiCorp believes that not allowing estimates for more than 2 consecutive billing cycles is unreasonable. Our Customer Service System does not provide an exception notice until the account has been estimated twice. The 2-month requirement is particularly unfeasible for remote locations and for locations where access is a problem. Would the Commission recommend that the Company disconnect service for customers where the meter cannot be accessed?

WAC 480-100-171

(3) The Company believes that a more reasonable time frame to perform and report back to the customer on additional meter tests would be 15 to 20 business days.

(6) We propose eliminating the requirement that the utility provide the customer with the meter manufacturer's name and the manufacturer's meter number. We do not believe this information is useful for customers.

METERING RULES

WAC 480-100/136/141/146

We will have some comments on this at the workshop.

WAC 480-100-X10 (2)

Change wording of first part of paragraph to state "The net metering system used by a customer-generator must include, at the customer's own expense, all equipment necessary to meet applicable safety, power quality and interconnection requirements of the serving utility. The equipment used by the customer will meet the applicable parts of the National Electrical Code..."

WAC 480-100-161/201

Revise paragraph (1) to provide testing every 12 months vs. 6 months. The use of solid state voltmeters and portable standards within the industry has shown that annual testing is warranted and sufficient.