825 N.E. Multnomah
Portland, Oregon 97232
(503) 813-5000

PACIFICORP
PACIFIC POWER UTAH POWER

May 20, 2005

BY OVERNIGHT MAIL

U 901 E
California Public Utilities Commission
Docket Office
Energy Division, 4th Floor
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: RESPONSE OF PACIFICORP (U-901 E) TO ADMINISTRATIVE LAW JUDGE'S RULING RELEASING ENERGY DIVISION'S REPORT ON SMALL AND MULTI-JURISDICTIONAL UTILITY FUNDING FOR 2005 LOW-INCOME PROGRAMS

Enclosed for filing are the original and four copies of PacifiCorp's (U 901-E) comments in response to the ALJ's Rulings releasing Energy Division's Report on Small and Multi-Jurisdictional Utility Funding for 2005 Low-Income Programs. These comments are also being served via electronic mail (First Class Mail if no electronic address is available) on the appearances and state service list in R. 04-01-006 as shown in the attached Certificate of Service.

Also, it is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 800
Portland, OR 97232

Sincerely,

Christy Omohundro
Vice President, Regulation

Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Proposed Policies and Programs Governing post-2003 Low-Income Assistance Programs.	Rulemaking 04-01-006 (Filed January 8, 2004)
In the Matter of the Application of PACIFICORP for Approval of 2005 Low-Income Assistance Program Budgets.	Application 04-06-038 (File June 30, 2004)
In the Matter of the Application of Southwest Gas Corporation (U 905 G) for Approval of Program Year 2005 Low-Income Assistance Program Budgets.	Application 04-07-002 (Filed June 30, 2004)
Application of Southern California Gas Company (U 904 G) for Approval of Program Year 2005 Low-Income Assistance Programs and Funding.	Application 04-07-010 (Filed July 1, 2004)
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Program Year 2005 Low-Income Assistance Programs and Funding.	Application 04-07-011 (Filed July 1, 2004)
Southern California Edison Company's (U 338-E) Application Regarding Low-Income Assistance Programs for Program Year 2005.	Application 04-07-012 (Filed July 1, 2004)
Application of Pacific Gas and Electric Company (U 39 M) for Approval Of The 2005 California Alternate Rates for Energy and Low Income Energy Efficiency Programs and Budget.	Application 04-07-013 (Filed July 1, 2004)
IN THE MATTER of the Application SIERRA PACIFIC POWER COMPANY (U 903), for an Order Approving its 2005 California Alternate Rates for Energy (CARE) and Low Income Efficiency (LIEE) Plans and Budgets.	Application 04-07-014 (Filed July 1, 2004)

In the Matter of the Application of Avista Corporation for Approval of Program Year 2005 Low-Income Assistance Program Budgets.	Application 04-07-015 (Filed July 1, 2004)
In the Matter of the Application of the SOUTHERN CALIFORNIA WATER COMPANY (U 133 W) Regarding Low Income Assistance Programs for its Bear Valley Electric Service Customers for Program Year 2005.	Application 04-07-020 (Filed July 8, 2004)
Application of Alpine Natural Gas Operating Company No. 1 LLC in Compliance with Decision 03-12-016 (PY 2004 Low Income Energy Efficiency ("LIEE") and California Alternate Rates For Energy ("CARE") program Plans).	Application 04-07-027 (Filed July 2, 2004)

COMMENTS OF PACIFICORP (U 901E)

Pursuant to ALJ Steven A. Weissman's April 29, 2005 Ruling in the consolidated matters referenced above, PacifiCorp submits the following Comments on the Energy Division report (the "Report") addressing the proposed 2005 programs and funding levels of the small and multi-jurisdictional utilities ("SMJUs").

PacifiCorp appreciates this opportunity to respond to the Energy Division's views on the California Alternate Rates for Energy ("CARE") and Low Income Energy Efficiency ("LIEE") programs of the SMJUs. The Company's Comments are limited to the Report's CARE discussions applicable to PacifiCorp.

1. PacifiCorp's CARE Program

PacifiCorp serves approximately 34,247 residential customers in its northern California service territory. Of this number, the Company estimates that approximately 46 percent, or 15,754 residential customers, may be income eligible for CARE rates. (Update from number reflected in Report, Table 4, p. 9.) PacifiCorp has a low-income concentration significantly higher than what statewide data would suggest, as the Energy Division acknowledges on page 9 of the Report.

2. PacifiCorp's CARE Outreach Activities and Participation Rates

The Company added 1,049 customers to its CARE enrollment in 2003. Report, Table 5, p. 11. As recently reported in the PacifiCorp Annual CARE and LIEE Report submitted May 1, 2005, an additional 1,123 customers were added in 2004, bringing the total enrolled for the CARE program to 4,445 at December 31, 2004. The 2,232 additional customers added over the two-year period represents over a 50 percent increase in number of CARE participants from 2002 participant numbers. The 4,445 enrolled customers represent approximately 28 percent of the number of Company residential customers that may be eligible for CARE participation. PacifiCorp recognizes that its CARE participation rates are not as high as the Energy Division, the Commission and PacifiCorp would like to see realized, but the Company does believe that enrollment efforts since 2002 have been steady and productive.

The Energy Division maintains that PacifiCorp has done a "dismal job of reaching its eligible population and increasing enrollment." Report, p. 15. While the Company is not satisfied with the current participation rate, it does not believe that it has done a poor job of reaching the possible eligible population. Attached hereto and identified as PacifiCorp Exhibit 1 is an excerpt from the Company's CARE/LIEE Annual Report outlining the Company's recent (in this case, 2004 plus January, 2005) CARE outreach activities. The Company sent bill inserts explaining CARE and enrollment procedures to all of its residential customers in January and September, 2004.[1] CARE program information was provided in an article in "Voices," the Company's customer newsletter, sent to all residential customers in February and July, 2004. The CARE program was the subject of a bill message sent to all residential customers in August and December, 2004. In October, 2004 and again in January, 2005 the Company sent direct mailings with CARE program information to a total of approximately 19,600 customers in our service territory areas with high percentages of low income households.[2] A CARE application form was included in each letter as well as a postage-paid, return envelope addressed to PacifiCorp for the completed enrollment application. Prior to the winter heating season the Company conducted radio and newspaper promotions explaining the CARE program. PacifiCorp also provides program details through information printed on thousands of bags

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[1] A copy of the January, 2004 (similar to the September insert) insert is attached as Exhibit 2.

[2] A copy is attached as Exhibit 3.

distributed through a local pharmacy and has program information displayed on counter displays in community agency offices.

These outreach efforts have resulted in steadily increasing participation rates and PacifiCorp expects to see further growth in enrollment from these continuing outreach efforts. In addition to past efforts, PacifiCorp, as discussed below, is quite willing to initiate self-certification procedures in an effort to increase participation rates. The Company does believe, however, that even with self-certification, the Energy Division's recommended target of 70%, with a target of 10,902 enrolled participants for program year 2005 (*See* Report, p. 15), may not be realistically achievable. First, it will take several months for self certification procedures to be put in place. Second, while the Company believes that self certification should result in increased participation, it is unlikely that self certification (with continued aggressive outreach efforts) will cause participation rates to soar.

It is possible that one factor dampening participation rates in PacifiCorp's California service territory may be the sheer number of eligible customers. In D.89-07-062, issued in July, 1989, the interim order issuing guidelines for the CARE program allowed the PacifiCorp program rate be limited to households at or below 130% of federal poverty level compared to 150% of the federal poverty level for all other utilities in California. The rationale for this decision was that the average household income within the service territory was significantly below that of the State of California and 130% would yield an eligibility rate roughly

commensurate with that of the other utilities. Thus, with the implementation of D.02-01-040 in January, 2002, the income guidelines for PacifiCorp increased from 130% to 175% of the federal poverty guidelines. This significantly increased the number of customers eligible for the program to 46% of residential customers. A customer whose income is close to average in the area may be reluctant to participate in a program labeled as "low income." Another factor may be the level of PacifiCorp's retail price of electricity. The average PacifiCorp California residential customer uses 913 kwhs of electricity per month. In a winter month, that consumption would be billed $77.45 under PacifiCorp's residential Schedule D. If that same consumption were subject to a residential schedule of a major California electric utility, e.g., Pacific Gas & Electric Company's current Residential Schedule E-1, the 913 kwhs would be priced at $139.66.[3] The value of the discount is correspondingly lower. PacifiCorp is not discounting the statutory right of CARE-eligible customers to secure their CARE discount. The Company recognizes that all CARE-eligible customers should be apprised of their eligibility and if they wish, should be enrolled in the program. What the Company is contending is that there may be some customer inertia involved in enrolling in the program. We ask the Commission to consider this factor in evaluating PacifiCorp's performance.

[3] See Exhibit 4 for the calculations.

3. CARE Program Self Certification and Recertification

The Energy Division recommends that all SMJUs adopt self certification of CARE applications. Report, p.3. Currently, PacifiCorp has its customers' CARE applications certified through Department of Community Services and Development ("DCSD") and they forward a list of income certified customers to PacifiCorp on a weekly basis. The community organizations, under contract with DCSD, help customers fill out the CARE application when they are filling out a Low Income Home Energy Assistance Program ("LIHEAP") application. Report, p. 37.

PacifiCorp is willing to explore with the Energy Division implementation of a self certification program even while waiting for the Commission decision in the present proceeding. PacifiCorp contemplates that it will need to seek authorization to expend monies exceeding its current program budget to implement the incremental costs of self certification and other efforts that may contribute to meeting the Energy Division's recommended target. Upon Commission authorization, the Company contemplates implementing a promotion campaign that will utilize bill messages, press releases, radio and newspaper ads, bill inserts and distribution of CARE program information at local events and to local agencies.

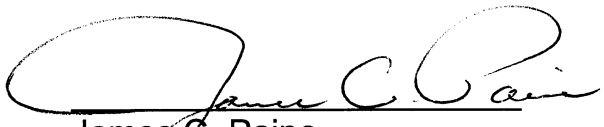
Finally, on page 37 of the Report, the Energy Division indicates that it isn't clear whether PacifiCorp has implemented a re-certification program. PacifiCorp

does, in fact, have a re-certification program which has been in place since January, 2004.

4. The Lack of CARE and LIEE Balancing Accounts

In April, 2003, PacifiCorp filed its Advice No. 312-E pursuant to D.03-03-007, issued March 13, 2003. The filing sought to establish a two-way balancing account for the CARE program and a one-way balancing account for the LIEE program. The Office of Ratepayer Advocates protested the Company's advice letter filing. To date, the Commission has not acted on PacifiCorp's filing. PacifiCorp is at a disadvantage in effectively managing its CARE and LIEE programs without the requested authorization to establish balancing accounts. The Company respectfully requests that the Commission authorize the establishment of CARE and LIEE balancing accounts for PacifiCorp as was contemplated in D.03-03-007 (*See* D.03-03-007, p. 5).

Respectfully submitted,



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Stoel Rives LLP
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Portland, OR 97204-1268
Of Attorneys for PacifiCorp

TABLE 2 - 2004 PACIFIC POWER CARE OUTREACH ACTIVITIES

Activity	Summary	Timeline	Status (In Progress/Completed)	Cost
Bill Inserts	Program information included in all residential bills (approximately 33,000)	January 2004	Completed	$16*
Customer Newsletter	Article placed in "Voices" newsletter distributed in bills (approximately 33,000)	February 2004	Completed	No incremen-tal cost
Customer Newsletter	Article placed in "Voices" newsletter distributed in bills (approximately 33,000)	July 2004	Completed	No incremen-tal cost
Counter Displays	Restocked counter displays placed in agency offices	August 2004	Completed	$213
Bill Message	Message regarding program printed on all residential bills (approximately 33,000)	August 2004	Completed	No incremen-tal cost
Bill Inserts	Program information included in all residential bills (approximately 33,000)	September 2004	Completed	$4,700
Direct Mail	Program information to areas with high % of low income households (approx. 9,800)	October 2004	Completed	$7,361
Community Leader Newsletter	Article directing individuals to Pacific Power web site for program information	October 2004	Completed	No incremen-tal cost
Radio and Newspaper Promotion	Program information provided through media campaign	October 2004	Completed	$7,269
Pharmacy Bags	Program information printed on bags distributed at local pharmacy (24,000 bags)	November 2004	Ongoing	$1,449
Bill Message	Message regarding program printed on all residential bills (approximately 33,000)	December 2004	Completed	No incremen-tal cost
Direct Mail**	Program information to areas with high % of low income households (approx. 9,800)	January 2005	Completed in Jan. 2005	$1,000

* Bill Inserts were printed in mid-2003 for insertion in September 2003 and January 2004 bills. All costs except shipping were incurred in 2003.

** Portion of costs related to January 2005 direct mailing incurred in December 2004.

PACIFIC POWER

For information on additional energy assistance programs, call the agency in your county listed below:

Del Norte County:
Del Norte Senior Center, (707) 464-9013

Modoc County:
T.E.A.C.H., (530) 233-3111

Shasta County:
S.H.I.P., (530) 378-6900 or
1-800-479-5954 (Monday and Tuesday 1–4 p.m. only)

Siskiyou County:
Great Northern Corporation, (530) 938-4424

CARE has been available since Nov. 1, 1989, when the California legislature authorized the program through Senate Bill 987. The bill requires all electric and gas utilities regulated by the California Public Utilities Commission to offer the CARE program to qualifying residential customers. CARE is funded through a surcharge on non-CARE customers' monthly bills as required by the California Public Utilities Commission and the state senate.

PACIFIC POWER

Making it happen.

9/03 © 2003 PacifiCorp

You may be eligible for a 20 percent discount on your electricity bill

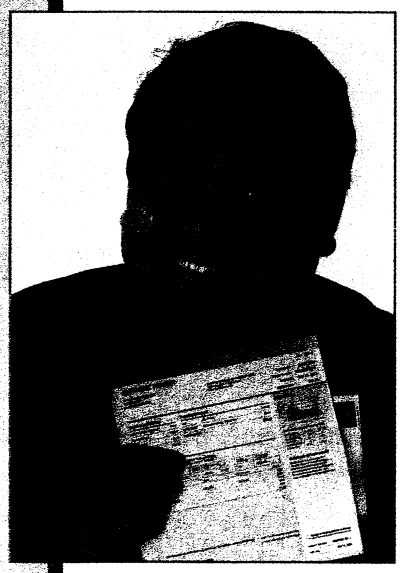


EXHIBIT 2

We CARE

We'd like to remind you that we offer a 20 percent discount on monthly Pacific Power bills to income-qualifying residential customers – homeowners, renters, families, singles, young and old – under the California Alternative Rates for Energy (CARE) program. **On average, Pacific Power customers participating in CARE will receive a discount of about $12 a month,** although the actual amount varies based on electricity usage.

Households with incomes no greater than the amounts shown below will qualify for CARE and Pacific Power's weatherization program:

Household size	Annual income no greater than:
1-2	$23,000
3	$27,000
4	$32,500
5	$38,000
6	$43,500
7	For households with more than six persons, add $5,500 for each additional individual to determine income level.

If you applied for CARE before and were turned down, try again. Income limits have changed and you may qualify.

To obtain an application for CARE, please call toll free 1-866-675-6627.

Usted podría ahorrar 20 porciento en su cuenta de energía por medio de "CARE." Para información en español, llame al 1-866-675-6627.

Weatherize and save

In addition to CARE, Pacific Power works with local agencies to provide free weatherization services to income-qualifying homeowners and renters living in single-family homes, mobile homes or apartments. Based on the home's needs, a variety of measures can be installed including insulation, energy-efficient showerheads, compact fluorescent light bulbs and more. All of these measures are designed to lower your bills while keeping your home comfortable.

To apply for weatherization in Del Norte and Siskiyou counties, please call the community agency in your county:

Del Norte County:
Del Norte Senior Center, (707) 464-9013

Siskiyou County:
Great Northern Corporation, (530) 938-4424

For more information or ideas on how to save energy and money, please visit **www.pacificpower.net.**

825 N.E. Multnomah, Suite 300
Portland, OR 97232

PACIFIC POWER

October 22, 2004

Dear

At Pacific Power, we know how difficult it can be to make ends meet. We also know that electricity is essential to your comfort, health and well being. Therefore, we are pleased to offer income-qualifying residential customers in California **a 20 percent discount on monthly bills** under the California Alternative Rates for Energy (CARE) program. **On average, Pacific Power customers participating in CARE will receive a discount of about $13 a month,** although the actual amount varies based on electricity usage.

Households with incomes no greater than the amounts shown below will qualify for CARE:

Household size	Annual income no greater than
1-2	$23,400
3	$27,500
4	$33,100
5	$38,700
6	$44,300
7	For households with more than six persons, add $5,600 for each additional individual to determine income level.

Please apply for CARE if you are not currently participating and your income is not greater than the levels listed above. **To apply, complete the enclosed application form and return it in the postage-paid envelope.** You can also call toll-free at 1-866-675-6627 with questions.

In addition to CARE, income-qualifying households may also qualify for free weatherization services. To learn more about these services, call the Del Norte Senior Center at (707) 464-9013 in Del Norte County, or Great Northern Corporation at (530) 938-4424 in Siskiyou County.

For details or more information on how to save energy and money, please visit **www.pacificpower.net.**

Sincerely,

Karen Gilmore

Karen Gilmore
Vice President, Customer Services

Usted podría ahorrar 20 porciento en su cuenta de energía por medio de "CARE." Para información en español, llame al 1-866-675-6627.

EXHIBIT 3

PACIFIC POWER

CALIFORNIA ALTERNATIVE RATES FOR ENERGY (CARE)

(Pacific Power's CARE program provides a monthly discount on your Pacific Power electric bill.)

State of California
Department of Community Services and Development
P.O. Box 1947
Sacramento, CA 95812-1947
1-866-675-6627 Toll-Free
(916) 327-6318 TTY/TDD

To participate in the CARE rate, you must submit a copy of your current gross monthly income for everyone living in your home. You must also submit a copy of your current Pacific Power bill. PLEASE NOTE: The name on the bill and the name on this application must match. DO NOT SUBMIT ORIGINAL DOCUMENTS; THEY WILL NOT BE RETURNED.

If your name or address has changed, you MUST inform Pacific Power. There is no charge for changing or adding a name to your Pacific Power account.

Your Name (as it appears on your Pacific Power bill)

First | Middle | Last

Mailing Address

Number and Street | Apartment Number

City | State | ZIP Code

Social Security Number ___-__-____

Daytime Telephone Number (___) ___-____

INCLUDING YOURSELF, provide the number of people living in your home. ☐

For Official Use Only

Provide TOTAL ***GROSS MONTHLY INCOME*** for everyone living in your home and **attach current proof of income.** (Proof MUST match amount on TOTAL INCOME line.)

CalWORKs	$_____
SSI/SSP	$_____
SSA	$_____
Pensions	$_____
GA/GR	$_____
Wages	$_____
Interest Income	$_____
Other Income	$_____
TOTAL INCOME	$____.__

Submetered Applicants Only – Provide the name of Mobile Home Park _____

The information on this application will be used to determine and verify my eligibility for assistance. My signature gives consent for this information to be shared with other offices of the State and Federal Government and with my utility company. If eligible for Pacific Power's CARE discount, I authorize the proper change to my rate schedule and give consent to have my eligibility verified yearly. I declare, under penalty of perjury, that the information on this application is true and correct.

X_____

Applicant's Signature | Date | Witness' Signature (if applicant signed with a mark)

APPLICANT QUESTIONNAIRE

Pacific Power is currently conducting a survey to measure the effectiveness of its outreach efforts. The following questions are OPTIONAL. Answering the questions will have no effect on the handling of your CARE application or your participation in the program.

Please check the appropriate box(es).

APPLICANT'S AGE GROUP: ☐ **18-39** ☐ **40-59** ☐ **60 or older**

APPLICANT'S ETHNICITY: ☐ **African-American** ☐ **Caucasian** ☐ **Hispanic/Latino** ☐ **Native American** ☐ **Asian** ☐ **Other___**

REMEMBER, YOUR APPLICATION IS NOT COMPLETE WITHOUT ALL OF THE FOLLOWING:

YOU MUST INCLUDE: ☐ **Completed Application** ☐ **Copy of current Pacific Power bill** ☐ **Copy(ies) of current proof of income** ☐ **Signature**

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO 401 PORTLAND OR

POSTAGE WILL BE PAID BY ADDRESSEE

HOME ENERGY ASSISTANCE PROGRAM
PACIFIC POWER
PO BOX 1947
SACRAMENTO CA 95812-9926

PacifiCorp: Residential Schedule D (winter months rate)

Assuming 913 kwh (PacifiCorp customers' average consumption per month)

$5.30 basic charge plus $51.13 for the first 676 kwh (@ $0.07563/kwh) plus $21.02 for the next 237 kwh (913 minus 676= 237) (@ $0.08869/kwh) for a total of $77.45.

Pacific Gas & Electric Company Residential Schedule E-1

Assuming 913 kwh consumption

$42.06 for the first 368 kwh (@$0.11430/kwh) plus $14.29 for the next 110 kwh ((478 minus 368=110)(@ $0.12989/kwh)) plus $45.30 for the next 258 kwh ((736 minus 478=258) @ $0.17557/kwh)) plus $38.01 for the next 177 kwh ((913 minus 736=177 kwh)(@ $0.21474/kwh) for a total of $139.66

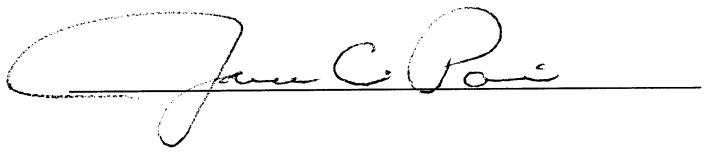
Exhibit 4

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **COMMENTS OF PACIFICORP (U 901E)** on all parties on the service list for this docket as provided by the California Public Utilities Commission Docket Office.

- ☐ mailing with postage prepaid
- ☐ hand delivery
- ☐ facsimile transmission
- ☐ overnight delivery
- ☑ Email

DATED: May 19, 2005.



Attorneys for PacifiCorp

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing documents to be served by U.S. mail or electronic mail upon the following named person(s) a true copy of PacifiCorp's (U-901-E) Reply Comments in Rule Making 04-01-006 on the date indicated below.

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