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August 2, 2006

(U 901-E)

Docket Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Attn: Docket Office

RE: Reply Comments of PacifiCorp (U 901-E) to Response of the Division of  
Ratepayer Advocates Response to PacifiCorp's Application for Approval of Its  
2007 and 2008 Low-Income Assistance Program Budgets

PacifiCorp (d.b.a. Pacific Power & Light Company, U-901-E) herewith submits an original and four copies of its reply comments to response of the Division of Ratepayer Advocates response to PacifiCorp's application for approval of its 2007 and 2008 low-income assistance program budgets.

If you have any questions, please contact Shay LaBray at (503) 813-6176.

Sincerely,

*Andrea L. Kelly* /sl

Andrea L. Kelly  
Vice President, Regulation

Enclosures

Cc: Service List

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of PacifiCorp (U 901-E) for Approval of  
Program Year 2007 and 2008 Low-Income Assistance  
Program Budgets.

Application 06-06-003  
(Filed June 1, 2006)

**REPLY OF PACIFICORP (U 901-E)  
TO THE RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES**

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Date: August 1, 2006

Attorneys for PacifiCorp

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of  
PACIFICORP (U 901-E) for Approval of  
Program Year 2007 and 2008 Low-Income  
Assistance Program Budgets

Application 06-06-003  
(Filed June 1, 2006)

**REPLY OF PACIFICORP (U 901-E)  
TO THE RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES**

Pursuant to the granting of PacifiCorp's motion requesting leave to file this late reply, PacifiCorp respectfully submits its reply to the Response of the Division of Ratepayer Advocates (DRA) in regards to PacifiCorp's application for approval of its 2007-2008 Low-Income Assistance Program Budgets.

**I. INTRODUCTION**

Pursuant to Decision 05-07-014, PacifiCorp filed its Application for Approval of Program Years 2007-2008 Low-Income Assistance Program Budgets on June 1, 2006 (A. 06-06-003). On July 6, 2006, DRA filed its response to PacifiCorp's application.

**II. DISCUSSION**

**A. DRA recommends that PacifiCorp continue to explore new outreach strategies to optimize penetration levels for LIEE and the CARE program.**

The company has increased outreach efforts significantly since 2003. Examples of these efforts include newspaper and radio advertisements, direct mail pieces, bill inserts and bill messages, counter displays at local agencies and program information

printed on grocery bags distributed to local food banks. A new outreach method initiated in September 2005, was the inclusion of CARE program information included in public school packets sent to parents of students. As a result of these efforts, the company has increased CARE participation to date by over 100% since December 2003.

Moreover, the company is continually exploring new methods for outreach for the LIEE and CARE program. In an effort to ensure PacifiCorp is using all available avenues to reach its California customers eligible for the CARE and LIEE programs, the Small Multi-jurisdictional Utilities (SMJU's) have periodic conversations to discuss and share information including outreach activities. PacifiCorp supports DRA's recommendation and will continue to explore ways to increase penetration levels in cooperation with other parties. PacifiCorp agrees with DRA's recommendation to explore appropriate metrics for the company's outreach goals.

**B. DRA recommends that PacifiCorp provide supplemental information about its LIEE and CARE programs so DRA can track the impact of PacifiCorp's outreach efforts on penetration levels.**

PacifiCorp supports DRA's recommendation and welcomes the opportunity to work with DRA to identify what supplemental information would be needed to track the impact of outreach on penetration levels.

**C. DRA recommends that PacifiCorp provide information regarding the actual cost of self-certification from November 2005 through April 2006.**

Actual dollars spent for self certification during the time period noted above totaled \$16,510. Additional labor has not been hired for the self certification program however, the program has incurred various costs to date including a direct mail piece sent out in December 2005 to all residential customers not on the CARE program.

This direct mail piece included information about the CARE program, a self-certification application and a return envelope.

**D. DRA recommends that PacifiCorp explain how it handles the documentation for CARE customers who do not send in self certification documentation.**

As of November 2005, the self-certification process does not require any income documentation for enrollment in the CARE program. A customer can enroll by completing the one-page self certification form, including a signature verifying that their income meets the required levels. Upon receipt of the enrollment form, the customer is placed on the appropriate CARE rate. All self-certification forms are retained for random verification purposes.

In response to DRA's request for additional information regarding the 2005 Annual Report, PacifiCorp was unable to provide the additional information to DRA because the Department of Consumer Services and Development ("CSD") did not provide the information to PacifiCorp. However, the company will review the reports sent from CSD for 2005 in an effort to provide for further information regarding why customers did not recertify. Looking to the future, as of January 2006, PacifiCorp no longer contracts with CSD for certifying and verifying customers for the CARE program and the Company has instituted a self-certification program which does not require any additional documentation beyond the customer certification that they meet the eligibility requirements of the CARE program. Accordingly, the issue of insufficient documentation as a reason for denying a customer for CARE enrollment no longer exists.

**E. DRA recommends that PacifiCorp explain how the CARE applications for sub-metered tenants are processed.**

PacifiCorp agrees with DRA's observation of the low penetration level for the CARE program for sub-metered tenants. In response, the company developed a new CARE program information letter and application targeted towards landlords. These were sent to landlords of sub-metered accounts in May 2006. The company followed-up by telephone with landlords and found that many landlords receiving the letter and application assisted income qualifying tenants with the application process for the CARE program. As of August 1, 2006, a total of 27 out of 31 landlords with sub-metered tenants in the company's service territory have tenants enrolled on the CARE rate. The company will continue to work with this sub-metered population to increase penetration levels.

**F. DRA comments that PacifiCorp has not set specific LIEE completion goals for 2006, 2007, and 2008.**

PacifiCorp responded to a data request sent to CPUC staff on June 26, 2006 with the following goals:

2006 LIEE homes treated – 70<sup>1</sup>  
2007 LIEE homes treated – 90  
2008 LIEE homes treated – 90

PacifiCorp will include in its annual report, as recommended by DRA, a progress report that shows the number of new homes treated in Modoc county as well as the other counties served by the community based organizations in our service territory.

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<sup>1</sup> The Company plans to expend \$44,885 in unutilized funds from the LIEE 2004 and 2005 approved budgets in order to increase LIEE completions. This carry-over of funds is in compliance with Decision 03-03-007. These funds will be utilized to initiate a partnership with an agency in Modoc County for LIEE services.

**G. DRA recommends that PacifiCorp provide additional information about why LIEE penetration rates remain low.**

PacifiCorp anticipates that the new partnership with the Redwood Community Action agency in Modoc County will provide a new resource for customers in Modoc County to increase penetration rates. In response to DRA's concerns regarding LIEE penetration rates as a percentage of eligible homes, the company will be re-evaluating the number of eligible homes to better determine what the actual penetration rate for LIEE is in PacifiCorp's service territory.

**H. DRA recommends that PacifiCorp include information in its annual report on the status of its energy efficiency education program and its impact on participation rates.**

PacifiCorp will include this information regarding the status of its energy efficiency education program and its impact on participation rates in future annual reports.

**III. CONCLUSION**

PacifiCorp appreciates DRA's review and recommendations of its Application for Approval of Program Years 7007 and 2008 Low-Income Assistance Program Budgets. PacifiCorp looks forward to continuing to work with DRA, the Energy Division Staff and the Commission on California Low-Income Programs.

Respectfully submitted this August 1, 2006 at San Francisco, California.

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By     /s/ Michael Day      
Michael B. Day

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**CERTIFICATE OF SERVICE**

I, Peggy Bruce, certify that I have on this 2nd day of August 2006 caused a copy of the foregoing

**REPLY OF PACIFICORP (U 901-E)  
TO THE RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES**

to be served on the parties on the attached service list via Electronic Mail or U.S.

Mail and Hand Delivered to the parties below:

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Administrative Law Judge Steven A. Weissman  
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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2nd day of August 2006 at San Francisco, California.

*/s/ Peggy Bruce*

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TO THE RESPONSE OF THE DIVISION OF RATEPAYER  
ADVOCATES**

Pursuant to Rule 45 of the Commission’s Rules of Practice and Procedure, PacifiCorp hereby submits this motion requesting the Commission allow PacifiCorp to file the attached Reply of PacifiCorp (U 901-E) to the Response of the Division of Ratepayer Advocates.<sup>1</sup> Rule 44.6 permitted the filing of a reply to “protests and responses within 10 days of the last day for filing protests and responses under Rule 44.1, unless the administrative law judge sets a different date.” Accordingly, under Rule 44.1, PacifiCorp’s reply was due on July 17, 2006. However, the demands of PacifiCorp’s general rate case, including reaching settlement with virtually all parties in the proceeding and the recently held hearings on remaining contested issues, prevented staff with responsibilities in both proceedings from responding to the Response prior to today.

Moreover, no party will be prejudiced by acceptance of this late response.

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<sup>1</sup> The Response of the Division of Ratepayer Advocates was filed with the Commission on July 6, 2006. Attached to this motion as Exhibit 1 is the Response of PacifiCorp (U 901-E) to the Response of the Division of Ratepayer Advocates.

PacifiCorp agrees with virtually all of the Division of Ratepayer Advocates (DRA) suggestions regarding further information that would be useful to the Commission. Where PacifiCorp has offered alternatives to DRA's suggestions, PacifiCorp's alternative suggestions are offered as alternative means for providing information in a manner that is less costly for the Company.

For the foregoing reasons, PacifiCorp respectfully requests the Commission allow the PacifiCorp to submit its reply to the response of the Division of Ratepayer Advocates.

Respectfully submitted this August 2, 2006, at San Francisco, California.

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By           /s/ Michael B. Day            
Michael B. Day

Attorneys for PacifiCorp

**CERTIFICATE OF SERVICE**

I, Peggy Bruce, certify that I have on this 2nd day of August 2006 caused a copy of the foregoing

**MOTION OF PACIFICORP (U 901-E) REQUESTING  
ACCEPTANCE OF THE MOTION OF PACIFICORP (U-  
901-E) REQUESTING ACCEPTANCE OF THE REPLY OF  
PACIFICORP (U 901-E) TO THE RESPONSE OF THE  
DIVISION OF RATEPAYER ADVOCATES**

to be served on the parties on the attached service list via Electronic Mail or U.S.

Mail and Hand Delivered to the parties below:

Commission Dian Grueneich  
California Public Utilities Commission  
State Building, Room 5203  
505 Van Ness Avenue  
San Francisco, California 94102

Administrative Law Judge Steven A. Weissman  
California Public Utilities Commission  
State Building, Room 4103  
505 Van Ness Avenue  
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Administrative Law Judge Kim Malcolm  
California Public Utilities Commission  
State Building, Room 5115  
505 Van Ness Avenue  
San Francisco, California 94102

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2<sup>nd</sup> day of August 2006 at San Francisco, California.

*/s/ Peggy Bruce*

\_\_\_\_\_  
Peggy Bruce



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