

Resolution M-4849
PacifiCorp Transition Plan Draft

I. TRANSITION PLAN INTRODUCTION

On March 4, 2020, Governor Newsom declared a state of emergency¹ in California as part of the state’s response to address the global outbreak of COVID-19. On March 16, PacifiCorp filed Advice Letter 605-E to suspend late payments and disconnections for non-payment in light of the COVID-19 pandemic. Resolution M-4848 further extended the consumer protections until June 31, 2021 with the possibility of revisiting the June 2021 date in the future. The resolution also requested utilities file a draft transition plan for lifting the moratorium to ease the transition for customers.

A. Transition Plan Objectives

- Reduce customers’ anxiety about protections ending,
- Effectively ease customers through a transition from COVID protections by implementing programs or initiatives, and enrolling customers in these programs/initiatives, to continue to assist them in bill management, and
- Proactively communicate with customers to inform them of changes in protections and help enroll them in programs to manage their bills.

B. Transition Plan Guiding Principles

- Easy and effortless customer experience,
- Easy to operationalize,
- Focus on affordability, and
- Engage stakeholders and customers.

II. ACTIVITIES TIMELINE

PacifiCorp’s transition plan includes the resumption of activities that were suspended as a result of Resolution M-4849 as well as Company driven customer protections put in place to help communicate with customers and allow customers additional payment plan options.

A. Summary of General Steps Mandated under Resolution M-4849

- **February 11, 2021** – Resolution M-4849 adopted by the Commission.
- **February 19, 2021** – PacifiCorp files Tier 1 Advice Letter demonstrating compliance with the extension of Emergency Customer Protections to June 30, 2021.
- **February 25, 2021** – PacifiCorp utility submits draft Transition Plan Advice Letter to the Commission.
- **March 11, 2021** – LIOB discusses PacifiCorp draft Transition Plan during its quarterly meeting.
- **April 1, 2021** – PacifiCorp submits final Transition Plan Advice Letter that incorporate feedback from LIOB and the Commission’s staff. PacifiCorp begins implementing the ME&O Strategy activities outlined in Section III below.

B. PacifiCorp Activities Suspended - Emergency Customer Protections in Resolution M-4842

- Disconnection for nonpayment and associated fees, waive deposit and late fee requirements for residential customers,
- Waive deposit requirements for residential customers seeking to reestablish service,
- Expedite move in and move out service requests,
- Implement payment plan options for residential customers,
- Freeze standard and high usage reviews for the California Alternate Rates for Energy (CARE) program eligibility,
- Contact community outreach contractors and community-based organizations (CBO) who assist in enrolling hard to reach low income customers, to help inform customers of eligibility concerns,
- Suspend CARE and FERA program removals, and
- Discontinue recertification and verification requests requiring customers provide their current income information.

C. Resumption of Disconnections for Non-Payment

- The timeline for resumption of disconnections for non-payment set forth below is set around a “Disconnection Policy Resumption Date” occurring at the soonest July 1, 2021.
- **60 days prior to Disconnection Policy Resumption Date** – PacifiCorp will begin sending out communications to customers informing them that the Company will resume applying standard disconnection procedures under its tariffs on the Disconnection Policy Resumption Date. The standard disconnection procedures are based on the timeline and requirements established by the Legislature under California Public Utility Code 779.1.
- **Disconnection Policy Resumption Date** – PacifiCorp will resume standard disconnection procedures under the timeline established under M-4849, with notices being issued to customers no earlier than July 1, 2021. PacifiCorp will individually reach out to each customer that has a delinquent bill as of the Disconnection Policy Resumption Date and will offer an opportunity to participate in extended payment plan arrangements to help pay off arrears accumulated during the customer service protections. The payment plan arrangements include longer terms and deferred or reduced payment. The choice of payment arrangements will be determined by the specific circumstances of the individual customer. If a customer is engaged in one of those types of payment assistance plans and is making timely payments under that plan, they will not be disconnected.
- **Disconnection Notification** – PacifiCorp may begin disconnecting customers for non-payment pursuant to the rules and procedures set forth under M-4849 and the applicable tariff rules. Prior to any disconnection for non-payment, the Company will provide advance noticing required by California Public Utility Code 779.1. In addition, each notice provided will mention the alternative payment arrangements made available as part of the transition plan.

D. Resumption of Verification/Recertification of Eligibility for CARE

- **June 1, 2021** – PacifiCorp will begin sending out written notices to all CARE customers informing them that the Company may resume applying the standard CAP eligibility verification and recertification requirements under its tariffs on July 1, 2021.
- **July 1, 2021** – PacifiCorp may resume standard eligibility verification and recertification procedures for CARE customers.

E. Late Payment, Reconnection, or Other Customer Fees

- **June 1, 2021** – PacifiCorp will begin sending out written notices to all customers informing them that the Company may resume applying the standard late payment, reconnection, or other customer fee procedures under its tariffs on July 1, 2021.
- **July 1, 2021** – PacifiCorp may resume applying standard late payment, reconnection, or other customer fees to customer accounts.

F. Payment Plans

Beginning in March 2020, PacifiCorp has offered residential and small commercial customers multiple payment plan options to help alleviate the financial hardships created by the pandemic. PacifiCorp intends to continue offering these payment arrangements for 180 days following the resumption of collection activities.

- **Residential Customers**
 - 12-month payment plans including equal payment plans,
 - Deferred payment plans with zero or reduced monthly installments towards an arrear for three months, or
 - Zero or 1/12th down payment.
- **Small Commercial Customers**
 - 6-month payment plans with 20% down payment.

III. MARKETING, EDUCATION, AND OUTREACH STRATEGY

The following Marketing, Education, and Outreach (“ME&O”) Strategy supports the Transition Plan in effectively easing customers through a transition off of the Emergency Customer Protections by proactively communicating with customers to enroll them in programs to manage their utility bills and informing them of the changes to programs in which they are already enrolled. The Strategy was developed with a customer-impact lens and is part of a coordinated and effective marketing, education, and outreach program. PacifiCorp plans to communicate the resumption of normal business practices in a clear and simple manner, while conveying empathy, dignity, and flexibility.

A. Target Audiences

- The ME&O Strategy is intended to reach customers at large, with specifically targeted categories of customers as follows:
 - Residential customers enrolled in bill management and assistance programs
 - Residential customers that may qualify for disconnection preventions due to medical needs
 - All customers with arrears

B. ME&O Activities for All Customers

- PacifiCorp will leverage ongoing communications channels to educate and engage customers about the June 30, 2021 expiration of Emergency Customer Protections enacted during the COVID-19 crisis; programs available to help customers maintain service; and where necessary, information about the extension of customer protections.
- Tools for implementation statewide, across all regulated electric utilities, include bill inserts or bill messaging, customer service talking points and training, outbound phone calls, direct mail, flyers, website content, newsletters, emails, social media, and press releases.

C. Communication Objectives

- Contact all customers with arrears using at least two communication methods
- Help customers avoid disconnection
- Reduce customer arrears balances
- Improve customer satisfaction by providing support and assistance
- Reduce the number of disconnect notices issued

D. Targeted Outreach

Proactive outreach to targeted customers have been ongoing since March 2020. PacifiCorp intends to continue providing outreach to customers, as well as include additional information as follows:

- Outbound phone calls (automated or manual) targeted at specific audiences. PacifiCorp has been making outbound calls through 2020 and the beginning of 2021 to make past due customers aware of payment plan eligibility, encourage customers to seek out assistance, and to contact the Company. PacifiCorp will update the script 60 days prior to resumption of disconnections to provide information on the resumption of normal business operations.
- Bill messages. PacifiCorp has provided bill messaging through 2020 and the beginning of 2021 to make customers aware of payment plan eligibility, encourage customers to seek out assistance, and to contact the Company. PacifiCorp will update the script 60 days prior to resumption of disconnections to provide information on the resumption of normal business operations.
- Energy Assistance outreach to encourage donations to Project HELP. This includes press release and donation envelopes included with bills. This started in February 2021.
- CARE and weatherization outreach in the form of bill inserts and direct mail providing information on CARE and other assistance programs. The bill insert will take place in March 2021 and the direct mail in September 2021.
- CARE recertification mailings will begin in May and August. PacifiCorp will also send 45, 60, and 90-day reminder mailings.
- Energy Assistance flyers in English and Spanish with local contact information for each county served by PacifiCorp. These flyers have been ongoing in 2020

and the beginning of 2021, with further outreach in spring 2021. The flyers are posted on the website and links to the website are provided in emails and other customer outreach.

- Website updates on customer service protections have been ongoing in 2020 and the beginning of 2021. PacifiCorp will update the website on May 1, 2021, 60 days prior to expiration of the customer service protections with information on the resumption of normal business operations.
- Customer newsletters with information and resources sent February 2021. The May newsletter will include details on the resumption of normal business operations.
- Emails in English or Spanish that include flexible payment option information as well as information on resumption of normal business operations. English emails have been sent in 2020 and beginning of 2021 and will continue. Spanish emails to be sent in May 2021.
- Social media posts on Facebook, Twitter, and so forth with resources including information on flexible payment options.
- Press release distributed to northern California media outlets 60 days prior to resumption of normal business operations.

Targeted outreach will convey the following information, as appropriate:

- Payment plans and options available to help customers maintain service or manage arrearages
- Application of late-payment, reconnection, and other fees to a customer
- Noticing of risk of disconnection
- Information about pending changes to a customer's service or program enrollment status
- Needed customer actions, including re-certifications, to remain eligible for programs
- Information about qualifying for disconnection preventions due to medical needs

E. Partnerships

PacifiCorp does not have a partner gas or electric utility in its service territory. PacifiCorp will continue to partner with community-based organization in the area: Great Northern, Del Norte Senior Center, and the Karuk Tribe to ensure customers receiving information on the consumer protections in place.

F. Incremental ME&O Costs (Optional)

PacifiCorp's marketing, education, and outreach efforts will leverage existing authorized budgets for outreach. The outreach listed above is part of the Company's normal operations budget, energy assistance budgets, or CARE budgets. The two exceptions would be outbound emails with specific information on the resumption of normal business operations and targeted energy assistance flyers in English and Spanish.

Need cost estimate and details on the incremental new activity here that explains why such costs are not already accounted for elsewhere.

IV. COMPLIANCE AND SAFETY

Resolution M-4849 provides that “Each IOU must explain in their Transition Plan Advice Letter how the transition plan maintains alignment with program enrollment targets, program eligibility requirements, and customer protections in effect outside Emergency Customer Protections (e.g., bans on requirements that energy customers pay a deposit to enroll in 12-month payment plan) established by Commission Decisions for relevant programs as outlined in Section 1, Activities Timeline.”

A. Alignment with Program Enrollment Targets and Requirements

- The twelve customer protections implemented in PacifiCorp’s Advice Filing 607-E-A filed in April 2020 remain unchanged. A detailed list of the protections can be found in the filing available at: <https://www.pacificpower.net/about/rates-regulation/california-regulatory-filings.html>
 - On April 1, 2021, PacifiCorp filed Advice Filing 642-E to extend the Emergency Customer Protections through June 30, 2021 by Resolution M-4849. There were no additional customer protections included.

B. Ensuring that Activities are Safe and Consistent with All Appropriate State and Local Health Orders

- PacifiCorp’s Emergency Management Officer continues to work with each of the three counties Offices of Emergency Management.

V. PROGRESS TRACKING AND REPORTING

PacifiCorp will monitor and track specific information regarding the enrollment of customers in programs to manage their utility bills and informing relevant customers of the changes to programs in which they are already enrolled. Reporting frequency shall be monthly and the first report shall include baseline data associated with progress metrics.

A. Metrics to Track Continued Enrollment in Bill Assistance Programs

- PacifiCorp will provide the following metrics to track that customers that enrolled in a bill assistance program when Emergency Customer Protections were in place are successful in sustaining their enrollment in the program if they still meet eligibility criteria.
 - Number and percent of newly enrolled customers that are able to stay on the CARE program post June 30, 2021.
 - Number and percent of customers required to take actions to remain on the CARE programs (e.g., recertification, post enrollment verification) that successfully complete those actions.

B. Metrics to Track Enrollments of Impacted Customers in New Payment Programs

- PacifiCorp utility will provide the following metrics to track enrollments of impacted customers in new payment programs.
 - Number and percentage of customers enrolled in alternative payment arrangements (defined as enrollment in an extended payment plan, or a plan for deferred or reduced payment).
 - Number and percentage of customers that are disconnected.
 - Change in arrearage amounts (to the extent such information is not already tracked as part of the Rulemaking R.17-06-024 reporting requirements).