California Public Utilities Commission

ADVICE LETTER SUMMARY

ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: PacifiCorp (U 901 E)

Utility type:
- [x] ELC
- [ ] GAS
- [ ] WATER
- [ ] PLC
- [ ] HEAT

Contact Person: Pooja Kishore
Phone #: (503) 813-7314
E-mail: californiadockets@pacificorp.com
E-mail Disposition Notice to: californiadockets@pacificorp.com; re

EXPLANATION OF UTILITY TYPE
ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 646-E-A

Tier Designation: 2

Subject of AL: Supplemental Advice Letter 646-E-A - Transition Plans Associated with Discontinuance of Emergency Customer Protections after June 30, 2021

Keywords (choose from CPUC listing): Compliance

AL Type: [ ] Monthly [ ] Quarterly [ ] Annual [x] One-Time [ ] Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
Resolution M-4849

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No.

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? [ ] Yes [x] No

If yes, specification of confidential information:
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? [x] Yes [ ] No

Requested effective date: 5/2/21

No. of tariff sheets: NA

Estimated system annual revenue effect (%): NA

Estimated system average rate effect (%): NA

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: See advice letter

Service affected and changes proposed[1]: See advice letter.

Pending advice letters that revise the same tariff sheets: NA

[1]Discuss in AL if more space is needed.

Clear Form

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Pooja Kishore
Title: Regulatory Manager
Utility Name: PacifiCorp
Address: 825 NE Multnomah, Suite 2000
City: Portland State: Oregon
Telephone (xxx) xxx-xxxx: (503) 813-7314
Facsimile (xxx) xxx-xxxx:
Email: californiadockets@pacificorp.com

Name:
Title:
Utility Name:
Address:
City: State: Oregon
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

PACIFIC POWER
A DIVISION OF PACIFICORP

825 NE Multnomah, Suite 2000
Portland, Oregon 97232

April 20, 2021

VIA ELECTRONIC FILING

Advice Letter 646-E-A
(U 901-E)

California Public Utilities Commission
Energy Division
Tariff Unit, 4th Floor
505 Van Ness Avenue
San Francisco, CA 94102
Email: edtariffunit@cpuc.ca.gov

RE: PacifiCorp (U 901-E) Advice Letter 646-E-A – Transition Plans Associated with Discontinuance of Emergency Customer Protections after June 30, 2021

PURPOSE

PacifiCorp d/b/a Pacific Power (PacifiCorp or company) submits this supplement to Advice Letter 646-E to address feedback received from Energy Division Staff on the Transition Plan (Plan) submitted on April 1, 2021. The revised Transition Plan is provided here as Attachment A to this filing.

BACKGROUND AND DISCUSSION

On April 1, 2021, in compliance with the Commission's Resolution M-4849 (Resolution), PacifiCorp filed its Transition Plan in Advice Letter 646-E. On April 12, 2021, Energy Division Staff notified PacifiCorp that its Transition Plan was missing the following requirements:

1. Requested arrearage data for the entire geographic region (p.14-15)
2. Information on any federal relief funds that are or may become available to assist customers in paying their utility bills (p.30).

This supplemental Transition Plan addresses the additional clarification sought by Energy Division staff regarding the company's April 1 Plan. Specifically, language was been added to Section III, Marketing, Education, and Outreach Strategy, subsections C and D to provide additional detail on any federal relief funds that are or may become available to assist customers in paying their utility bills. The company also modified the language in Section V., Progress Tracking and Reporting, to add more clarity around the metrics that PacifiCorp will be tracking. The company is providing a redline and clean copy of its updated Transition Plan with this filing.

PacifiCorp is also including in this filing initial report of customer data as of April 1, 2021, to establish a baseline by which the company can measure the effectiveness of its Transition Plan. This report is provided as Attachment A.

TIER DESIGNATION AND EFFECTIVE DATE

PacifiCorp respectfully requests no change to the May 2, 2021 effective date proposed in its initial advice letter filing, Advice Letter 646-E.

PROTEST

PacifiCorp respectfully requests that the protest period not be restarted and the end of the protest period continue to through April 21, 2021.

EFFECTIVE DATE

PacifiCorp respectfully requests no change to the May 2, 2021 effective date proposed in its initial advice letter filing, Advice Letter 646-E.

NOTICE

In accordance with General Order (GO) 96-B, Section 4, a copy of this Advice Letter will be served electronically or by U.S. mail to parties shown on the GO 96-B service list, a copy of which is attached. A request for change of address in the GO 96-B service list should be directed by electronic mail to Californiadockets@pacificorp.com. Advice letter filings may also be accessed electronically at: www.pacificpower.net/regulation.

Please direct any informal questions to Pooja Kishore, Regulatory Affairs Manager, at the telephone number or e-mail address shown above.

Sincerely,

Shelley McCoy

Shelley McCoy
Director, Regulation

Enclosures

cc: Service Lists for GO 96-B, R.18-03-011, A. 14-11-007, A.15-02-001, A.19-11-003, A.20-03-014, R.15-03-010, R.18-07-006, R.18-07-005, R.12-06-013, and A.19-09-014
Edward Randolph, Director, Energy Division

Resolution M-4849
PacifiCorp's Emergency Customer Protections – Transition Plan

I. TRANSITION PLAN INTRODUCTION

On March 4, 2020, Governor Newsom declared a state of emergency 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. The resolution also required utilities file a draft transition plan for lifting the moratorium. PacifiCorp is committed to supporting our customers to ease the transition off these emergency protections and submits this Transition Plan pursuant to Resolution M-4849, Ordering Paragraph 5.

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** – Low Income Oversight Board (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 Originally 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 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 Resolution 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 Resolution 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.

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 CARE 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 until December 31, 2021.

- **Residential Customers**
  - 12-month payment plans including equal payment plans,
  - Deferred payment plans with zero or reduced monthly installments towards an arrears 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 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
- Contact known renters 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 described below. Examples of several of the communications that have been provided are included in Appendix A to this report:

- 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. In addition, PacifiCorp will also target known renters with automated calls to let them know about funds available to help pay rent and utilities.
- 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 updated bill messages in March 2021 to include information about funds available to help pay rent and utilities.
- 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. Information about funds available for rental relief and utilities will be included in the September outreach.
- CARE recertification mailings will begin in May and August. PacifiCorp will also send 45-, 60-, and 90-day reminder mailings. These mailings will include information about rent relief.

- 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 Company's Bill Payment Assistance website (https://www.pacificpower.net/my-account/payments/bill-payment-assistance.html) 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 and it includes links to the rental relief checklist and local resources.~~.~~ 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 and mentions where customers can find online resources for housing and utility relief funds.
- 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. Emails in May and throughout the summer will include links for rental relief resources.
- Onsert in English and Spanish will be focused on rental relief and delivered to known renters in May/June statements.
- Social media posts on Facebook, Twitter, and so forth with resources including information on flexible payment options and resources to help pay rent and utilities.~~.~~
- 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
- Information about available funds to help pay rent and utilities.

Targeted outreach to hard-to-reach, disadvantaged, or underserved communities:

- 90+ day arrearages
- Medical Baseline
- Low-Income
- Known renters

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 Services, Del

Norte Senior Center, Redwood Community Action Agency, TEACH inc, SHIPP, and the Karuk Tribe to ensure customers receiving information on the consumer protections in place.

PacifiCorp will establish sharing agreements with partner CBOs to target LIHEAP assistance to at-risk customers. Additionally, PacifiCorp will work closely with the three partner CBOs that implement Energy Savings Assistance Program (ESA) in our area to construct best referral process for enrollment in energy efficiency program and increase participation.

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.

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 12 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 February 22, 2021, PacifiCorp filed Advice Filing 642-E to extend the Emergency Customer Protections through June 30, 2021 per 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. The metrics are designed to ensure customers have access to resources to avoid disconnection of service for non-payment, or they have the ability to access resources to facilitate

reconnecting of service Reporting frequency shall be monthly and the first report shall include baseline data associated with progress metrics.

Resolution M-4849 directs investor-owned utilities (IOU) to report ~~the~~certain metrics to track and report the progress of the transition plan. Resolution M-4849 directs energy IOUs to include these metrics as part of monthly report required by D.18-12-013. The monthly reporting required under D.18-12-013 does not apply to small and multi-jurisdictional utilities, such as PacifiCorp.[1] However, PacifiCorp will provide the requested tracking and reporting metrics in Resolution M-4849 on a monthly basis. The additional data will provide a more comprehensive review of the impact on customers after the moratorium. PacifiCorp does not have an arrangement management program in place or FERA. The focus is on CARE customers and customers receiving LIEAP as the way to identify and monitor low income customers.

Metrics to Track Success of Transition Plan

PacifiCorp will track and report monthly the following information:

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 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 17-06-024 reporting requirements).
    - Percentage of households enrolled in an alternative payment arrangements referred to ESA, LIWP, LIHEAP, and other programs.

[1] D.18-12-013, at 10-11, footnote 5. The Commission will address similar interim rules established in D.18-12-013 for the small and multi-jurisdictional utilities in a separate phase of R.18-07-005. See D.18-12-013, Ordering Paragraph 2.

C. ~~Metrics to Track Success of Transition Plan~~ Metrics to Monitor Disconnection of Service for Non-Payment

- ~~PacifiCorp will track and report quarterly the following information:~~
- PacifiCorp will provide the number of customers impacted by the lifting of the moratorium.
- Number and percentage of disconnections enrolled in ~~AMP~~ alternative payment arrangements.
- Number and percentage of disconnections enrolled in CARE
- Number and percentage of disconnections enrolled in CARE and ~~AMP~~alternative payment arrangements.
- Number and percentage of disconnections that received LIHEAP
- ~~Percentage of households enrolled in AMP an alternative payment arrangements referred to ESA, LIWP, LIHEAP, and other programs~~
- Median and average length of time for a customer to be reconnected after service is disconnected.
- Median and average arrearage amount and time past due from disconnection.

Resolution M-4849
PacifiCorp's Emergency Customer Protections – Transition Plan

I. TRANSITION PLAN INTRODUCTION

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

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- Expedite move in and move out service requests,
- Implement payment plan options for residential customers,
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C. Communication Objectives

- Contact all customers with arrears using at least two communication methods
- Contact known renters using at least two communication methods
- Help customers avoid disconnection
- Reduce customer arrears balances
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- 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 described below. Examples of several of the communications that have been provided are included in Appendix A to this report:

- 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. In addition, PacifiCorp will also target known renters with automated calls to let them know about funds available to help pay rent and utilities.
- 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 updated bill messages in March 2021 to include information about funds available to help pay rent and utilities.
- 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. Information about funds available for rental relief and utilities will be included in the September outreach.
- CARE recertification mailings will begin in May and August. PacifiCorp will also send 45-, 60-, and 90-day reminder mailings. These mailings will include information about rent relief.

- 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 Company's Bill Payment Assistance website (https://www.pacificpower.net/my-account/payments/bill-payment-assistance.html) 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 and it includes links to the rental relief checklist and local resources.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 and mentions where customers can find online resources for housing and utility relief funds.
- 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. Emails in May and throughout the summer will include links for rental relief resources.
- Onsert in English and Spanish will be focused on rental relief and delivered to known renters in May/June statements.
- Social media posts on Facebook, Twitter, and so forth with resources including information on flexible payment options and resources to help pay rent and utilities.
- 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
- Information about available funds to help pay rent and utilities.

Targeted outreach to hard-to-reach, disadvantaged, or underserved communities:

- 90+ day arrearages
- Medical Baseline
- Low-Income
- Known renters

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 Services, Del

Norte Senior Center, Redwood Community Action Agency, TEACH inc, SHIPP, and the Karuk Tribe to ensure customers receiving information on the consumer protections in place.

PacifiCorp will establish sharing agreements with partner CBOs to target LIHEAP assistance to at-risk customers. Additionally, PacifiCorp will work closely with the three partner CBOs that implement Energy Savings Assistance Program (ESA) in our area to construct best referral process for enrollment in energy efficiency program and increase participation.

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.

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 12 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 February 22, 2021, PacifiCorp filed Advice Filing 642-E to extend the Emergency Customer Protections through June 30, 2021 per 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. The metrics are designed to ensure customers have access to resources to avoid disconnection of service for non-payment, or they have the ability to access resources to facilitate

reconnecting of service Reporting frequency shall be monthly and the first report shall include baseline data associated with progress metrics.

Resolution M-4849 directs investor-owned utilities (IOU) to report certain metrics to track and report the progress of the transition plan. Resolution M-4849 directs energy IOUs to include these metrics as part of monthly report required by D.18-12-013. The monthly reporting required under D.18-12-013 does not apply to small and multi-jurisdictional utilities, such as PacifiCorp.[1] However, PacifiCorp will provide the requested tracking and reporting metrics in Resolution M-4849 on a monthly basis. The additional data will provide a more comprehensive review of the impact on customers after the moratorium. PacifiCorp does not have an arrangement management program in place or FERA. The focus is on CARE customers and customers receiving LIEAP as the way to identify and monitor low income customers.

Metrics to Track Success of Transition Plan

PacifiCorp will track and report monthly the following information:

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 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).
    - Change in arrearage amounts (to the extent such information is not already tracked as part of the Rulemaking 17-06-024 reporting requirements).
    - Percentage of households enrolled in an alternative payment arrangements referred to ESA, LIWP, LIHEAP, and other programs.

C. Metrics to Monitor Disconnection of Service for Non-Payment

- PacifiCorp will provide the number of customers impacted by the lifting of the moratorium.

[1] D.18-12-013, at 10-11, footnote 5. The Commission will address similar interim rules established in D.18-12-013 for the small and multi-jurisdictional utilities in a separate phase of R.18-07-005. See D.18-12-013, Ordering Paragraph 2.

- Number and percentage of disconnections enrolled in alternative payment arrangements.
- Number and percentage of disconnections enrolled in CARE
- Number and percentage of disconnections enrolled in CARE and alternative payment arrangements.
- Number and percentage of disconnections that received LIHEAP
- Median and average length of time for a customer to be reconnected after service is disconnected.
- Median and average arrearage amount and time past due from disconnection.

Attachment A

Transition Plan Tracking
Data Through March 2021

A. Bill Assistance Programs				
	Existing CARE customers	New Care Customers	Total Care Customers	Recertification Required after June 1, 2021
Total	11035	1070	12105	3995

B. Customers Enrolled in New Payment Programs		
	Alternative Payment Plans	Referred other programs*
Total	1095	0
Percentage	2.29%	0

Change In Arrears			
February to March 2021			
Non CARE	Month	Customer Count	Sum
	2021/02	5662	$2,677,704
	2021/03	5711	$2,899,896
	Difference	49	$222,192
CARE	Month	Customer Count	Sum
	2021/02	2566	$1,010,903
	2021/03	2604	$1,085,480
	Difference	38	$74,577

C. Disconnections for Non-Payment				
	Alternative Payment Plans	CARE Customers	CARE w/Alternative Payment Plans	LIHEAP Only
Total	0	0	0	0
Percentage	0	0	0	0

Median and average length of time for service to be reconnected.

N/A

Median and average arrearage amount at time of disconnection.

N/A

*ESA, LIWP, LIHEAP, or Other.

CERTIFICATE OF SERVICE
GO-96B Distribution List

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have on this 20th of April, 2021, at Portland, OR, provided via email or US mail, a true and correct copy of PacifiCorp's Advice Letter 646-E-A to the following:

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CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

PROCEEDING: R1206013 - CPUC - OIR TO CONDUC
FILER: CPUC
LIST NAME: LIST
LAST CHANGED: APRIL 15, 2021

Download the Comma-delimited File
About Comma-delimited Files

Back to Service Lists Index

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