

1 **Q. Please state your name and business address.**

2 A. My name is Carole A. Rockney. My business address is 825 N.E. Multnomah,
3 Suite 800, Portland, Oregon 97232.

4 **Q. Have you previously provided direct testimony in regards to this case?**

5 A. Yes.

6 **Q. What is the purpose of your rebuttal testimony?**

7 A. The purpose of my rebuttal testimony is to respond to direct testimony submitted
8 by Betsy Wolf on behalf of Salt Lake Community Action Program and Crossroads
9 Urban Center. Specifically, my testimony will address Section IV of Ms. Wolf's
10 testimony entitled "Proposed Changes in Fees."

11 **Q. What is Ms. Wolf recommending in her direct testimony regarding the**
12 **Company's proposed changes in fees?**

13 A. Ms. Wolf recommends in her testimony that the Company's proposed changes to
14 the Field Visit Charge, After Hours Reconnection Charge and Returned Payment
15 Charge be rejected. The rationale that Ms. Wolf provides for her recommendation
16 is that low income customers are more likely to incur Field Visit Charges, After
17 Hours Reconnection Charges and Returned Payment Charges than customers with
18 incomes at a higher level. The Company does not agree with Ms. Wolf's
19 "common sense suggestion" that low income customers are most likely to incur
20 the above charges

21 **Q. Please explain why the Company does not agree with Ms. Wolf's**
22 **assumptions?**

23 A. The majority of customers who are assessed Field Visit Charges, After Hours

24 Reconnection Charges and Returned Payment Charges are not low income.
25 Specifically, 91 percent of the customers who were assessed a Field Visit Charge
26 in 2005 were not low income; 90 percent of the customers who were assessed an
27 After Hours Reconnection Charge in 2005 were not low income; and 93 percent
28 of customers who were assessed a Returned Payment Charge in 2005 were not
29 low income. These percentages were developed by reviewing customer
30 participation in low income programs which include HEAT, Lend-A-Hand energy
31 assistance and the Low Income Lifeline Program offered under Electric Service
32 Schedule No. 3.

33 **Q. Please explain the underlying reasons the Company is proposing to increase**
34 **the charges described above.**

35 A. The rationale for increasing the Field Visit Charge, After Hours Reconnection
36 Charge and Returned Payment Charge is one of cost causation. That is, the
37 customer who chooses to incur the charge should be assessed the majority of the
38 cost. This reduces the subsidization of costs by all customers, including low
39 income customers. Currently, the cost of providing a field visit is estimated to be
40 \$20.34 and the Company is proposing an increase in this charge from \$15.00 to
41 \$20.00. The cost of providing after hours reconnection is more than \$115.00 and
42 the Company is proposing an increase in this charge from \$75.00 to \$100.00.
43 Finally, the cost of processing a returned payment is more than \$23.00 and the
44 Company is proposing to increase this charge from \$15.00 to \$20.00.

45 **Q. Are the increases in charges described above targeted at low income**
46 **customers?**

47 A. No. The proposed revisions are targeted to the customers who incur these costs,
48 the majority of which are not low income households. PacifiCorp recognizes the
49 needs of low income customers by offering programs that are designed to lower
50 their kWh usage and bills, as well as to provide energy assistance to households in
51 financial crisis. These programs include no-cost weatherization services as
52 approved in Electric Service Schedule No. 118, the Low Income Lifeline Program
53 available through Electric Schedule No. 3 and energy assistance through
54 contributions from the Company, customers and employees to the Lend-A-Hand
55 program administered by the American Red Cross.

56 **Q. Does this conclude your testimony?**

57 A. Yes.