

TOOL

Rate Case Discovery Questions

Community Action Partnership of Oregon

Weatherization Leveraged
Partnerships Project



BEFORE THE OREGON PUBLIC UTILITY COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
PORTLAND GENERAL ELECTRIC COMPANY)
FOR A GENERAL RATE INCREASE) Case No. UE-197
ELECTRIC RATES AND CHARGES)**

**Discovery of Community Action Partnership of Oregon
And Oregon Energy Coordinators Association (CAPO/OECA)
To Portland General Electric Company**

Please provide a single set of responses to the following data requests to the following persons:

Jim Abrahamson
Community Action Partnership of Oregon
PO Box 7964
945 Columbia Street NE
Salem, OR 97301
jim@caporegon.org

Roger Colton
Fisher, Sheehan & Colton
Public Finance and General Economics
34 Warwick Road
Belmont, MA 02478
roger@fsconline.com

INTRODUCTION

Community Action Partnership of Oregon and Oregon Energy Coordinators Association (CAPO/OECA) requests that Portland General Electric Company, (PGE), respond to the following requests for admissions, interrogatories and requests for production of documents (collectively referred to as “Requests”).

INSTRUCTIONS

Responses should be signed and affirmed by the person making them and should indicate the names of any other persons upon whose personal knowledge responses are based.

In answering these Requests, furnish all information that is available to PGE, including information in the possession of its attorneys, accountants and other agents of PGE. Should you have any question about these Requests, do not hesitate to contact the undersigned representative.

Any responses providing data in tabular or spreadsheet form should be provided as a “live” electronic spreadsheet.

All questions should be construed to refer to, and request data for, residential customers unless the language of the question clearly indicates to the contrary.

In order to simplify the issues and resolve as many matters of fact as possible before the hearing, CAPO/OECA further requests that if any of these Requests or portions thereof cannot be answered fully, such shall be answered to the extent possible together with the reason(s) for not answering fully.

If you object to furnishing any information requested by these Requests on the grounds of a privilege, please identify:

- a) The particular request objected to;
- b) The specific grounds on which your objection is based; and
- c) Identify the specific information objected to by furnishing the following:
 - i. Its date, those persons participating in its formulation; and
 - ii. A general description as to the nature, rather than the substance, of the purportedly objectionable information.

Notwithstanding objections asserted by you in regard to these Requests, you must disclose any information that is relevant and material to the Request calling for it, and which contains no objectionable matter. That portion of the information for which the objection is asserted may be withheld provided that the above requested identification is furnished.

The requests contained herein shall be deemed to be continuing. You are obligated to change, supplement and correct all answers to interrogatories, production requests, and requests for admission to conform to available information, including such information that first becomes available to you after your response hereto is filed.

DEFINITIONS

Unless otherwise indicated, the following definitions of terms shall apply herein:

1. To "identify" means
 - a. When used in reference to a natural person it means to state the person's full name, current residence and business addresses, current residence and business telephone numbers and, if applicable, his or her title, dates of employment, and job description. If current addresses are unknown, provide the last known business and residence address;
 - b. When used in reference to a document it means to state the type of document (*e.g.*, letter, memorandum, telegram, chart, etc.), its author and originator, its date or dates, all addressees and recipients, and its present location or custodian. If any such document was but is no longer in your possession or subject to your control, state what disposition was made of it, including the date that it left your possession or control and identify the person to whom you transferred it.
2. To "describe," "detail," "describe in detail," "detailed description," "state" or "state in detail" shall mean to relate as completely as possible each and every act, omission,

incident, event, condition, circumstance, or thing relating directly or indirectly to the subject of the description, including all pertinent dates.

3. "To analyze," "analyzed" or "an analysis" is any calculation, catalogue, chart, compilation, computation, diagram, evaluation, examination, graph, listing, measurement, outline, spreadsheet, table, tabulation, or report that lists, describes, states, verifies, demonstrates, shows or determines any actuality, circumstance, concept, data, evidence, feature, incident, information, idea, occurrence, performance, result or statistic either through empirical data, datum, statistics or any other quantitative or qualitative means.
4. "To explain" or "explanation" means to make known in detail, to make clear the cause or reason of and account for each act, omission, incident, event, condition, circumstance, decision, and/or thing relating directly or indirectly to the subject of the explanation including all pertinent dates.
5. "Aging" means the determining of the length of time since a financial transaction occurred on an account.
6. "Document" is to be broadly construed and means any written, recorded or graphic matter however produced or reproduced, including but not limited to correspondence, other written communications, and means every recording or reproduction, including visual or auditory recordings or reproductions, photographs, drawings, or other written communications, magazine or journal articles, computer files, contracts, agreements, notes, memoranda, handwritten notes, analyses, books, periodicals, pamphlets, tax returns, telexes, charts, maps, logs, exhibits, pleadings, canceled checks, financial statements, computer tapes, computer printouts, computer disks, electronic mail or "e-mail," or other electronic means of transmitting information, microfilm microfiche, projections, time records, employment records, work papers, diaries, calendars, schedules, analyses, projections, work papers, diaries, calendars, minutes of meetings of the board of directors or of the shareholders of PGE, or any of its subsidiaries, or of any committees appointed by or reportable to them, or any other writings, including copies of any of the foregoing now in the possession, custody or control of PGE, its subsidiaries, its divisions, its merged or acquired predecessors, its present or former directors, officers, counsel, agents, employees and all persons acting on its behalf.
7. "Employee" shall include officers, employees or agents of PGE, including but not limited to independent accounting and/or consulting firms retained by PGE and shall mean any person serving in such capacity at any time during or since 1970, unless the question indicates a longer period of time, even though no longer serving in such capacity.
8. "Late fee" includes any fee that PGE assesses upon any customer for payment of the "amount due" on any PGE billing statement for payment after the due date for the payment.

9. "Policy" means each rule, procedure or directive, formal or informal, written or unwritten, and any common understanding of a course of conduct which was recognized as such by your present or former directors, officers, agents, employees or other persons acting or purporting to act on your behalf, which was in effect at any time during the time period relevant to the question and your response.
10. "Record" or "records" includes any regular, formal or not formal, official or not official memorandum, document or written or electronic preservation of any events, actions taken or rejected, decisions, and details thereof relating to the subject matter of the question and your response. A copy of the original "record" is preferred; stating the substance thereof will suffice where a copy cannot be made and is not available.
11. "Report" means any analysis of data collected or created by PGE, including any of its directors, employees, officers, agents, which may be in an electronic or hard copy format, and includes memoranda, letters, or other documentary forms.
12. "PGE," "Company," "you" or "your" refers to Portland General Electric Company, including any divisions, departments, business units, management teams, committees, subsidiaries, parent companies, affiliates, predecessors, present or former directors, officers, owners or agents of each such entity and all other persons acting or purporting to act on behalf of each such entity, as well as each joint venture or partnership in which that entity or person is a partner.
13. "Commission" means the Oregon Public Utility Commission.

CAPO/EOCA Discovery Set 1

1. Please provide a single copy of all discovery responses provided to each other party to this proceeding.
2. Please provide by month for October 2005 to present, the aging of residential arrears.
 - a. Provide the aging of arrears by dollar amounts in each aging bucket.
 - b. Provide the aging of arrears by number of accounts in each aging bucket.
3. Assume for purposes of this Data Request that a residential bill is rendered on Day 1. Assume further the bill remains unpaid. Provide the timeline of each collection step until the bill is final-billed for nonpayment. Identify the Day on which each step of the collection process can be expected to occur.
4. Assume for purposes of this Data Request, that 100 residential bills are rendered on Day 1. Please provide:
 - a. What percent of those bills are paid by the due date of the bill. Please identify what Day the due date falls on.
 - b. What percent of those bills are paid by the time the next month's bill is rendered.
 - c. What percent of those bills are paid by the time the second subsequent bill is rendered.

- d. What percent of those bills are paid by the time the third subsequent bill is rendered.
5. Please provide the dollars of residential late fee revenue collected by month for each month October 2005 to present.
6. Please provide the number of residential accounts paying a late charge by month for each month October 2005 to present.
7. Please provide the most recent cost justification filed with any regulatory commission of the current residential late payment fee imposed by Portland General Electric Company, irrespective of the jurisdiction in which the filing was made. Please indicate the date of the filing.
8. Please provide the most recent cost justification filed with the Oregon regulatory commission of the current residential late payment fee imposed by Portland General Electric Company. Please indicate the date of the filing. For this filing, please provide a copy of all:
 - a. Pre-filed direct and rebuttal testimony filed in support of the filing; and
 - b. The final regulatory disposition of the request for the proposed rate.
9. Please provide a list of all PGE residential electric service charges not covered by an energy charge.
 - a. For all such service charges, please provide by month for the months October 2005 to present the revenue generated by that service charge;
 - b. If monthly revenue is not available, please provide the revenue from each fee for the time periods available (e.g., quarterly, annually, etc.).
10. For each service charge identified immediately above, provide the most recent cost-justification for the fee as submitted to the Oregon Public Utility Commission.
11. Please provide a list of all internal policy constraints placed on the disconnection of service for nonpayment. Such constraints might include, but not be limited to, a minimum dollar level of arrears that must be reached before a disconnection for nonpayment is performed; a minimum age of arrears that must be reached before a disconnection for nonpayment is performed; and other similar policies. For each item on the list, provide the specific constraint. For example, provide the dollar amount above which an arrears must be for the account to be disconnected. Provide the age an arrears must be before it is disconnected.
12. Please provide by month for each month October 2005:
 - a. The average bill for all residential accounts;
 - b. The average arrears of accounts in arrears;
 - c. The average bill of accounts in arrears;
 - d. The total dollars of residential arrears

- e. The percentage of residential dollars constituting arrears;
 - f. The percentage of billed accounts having arrears; and
 - g. The average arrears of all residential accounts disconnected for nonpayment in that month.
13. Please provide by month for each month October 2005 to present, a distribution of the number of accounts in arrears by the size of arrears by the following bands: (1) \$0 - \$100; (2) \$101 - \$200; (3) \$201 - \$300; (4) \$301 - \$500; (5) \$501 - \$750; (6) \$751 - \$1,000; (7) \$1,001 - \$2,000; and (8) \$2,001 and above. If these bands are not available, please provide the numbers of accounts by which bands are available.
 14. Please provide the number of residential accounts by month for each month October 2005 to present.
 15. Please provide the total residential revenue for energy charges (without taking into account miscellaneous customer service charges or late payment charges) by month for each month since October 2005. These “energy charges” should, for purposes of this data request, include fixed monthly customer charges.
 16. Please provide the total number of field personnel by month for each month October 2005 to present, which field personnel perform disconnections for nonpayment for residential customers.
 17. Please provide the average number of residential disconnections for nonpayment per day per individual field personnel doing disconnections for nonpayment. If such average differs by month or by season of the year, separately provide the different numbers along with an identification of which month or season the number relates to.
 18. Please provide the average number of residential disconnections for nonpayment that occur on each day of the week. In the alternative, please provide the percentage of total weekly disconnections that occur on each day of the week.
 19. Please provide the average time (in minutes or in increments of an hour) that it takes a company staffperson to perform a residential disconnection of service for nonpayment.
 20. For a typical field staff person that performs residential disconnections for nonpayment, please provide:
 - a. The percent of a typical day spent on performing disconnections for nonpayment;
 - b. The percent of a typical week spent on performing disconnections for nonpayment;
 - c. The percent of a typical month spent on performing disconnections for nonpayment.

If this data differs by month or season, indicate the differences and then identify the month or season to which the difference apply.

21. In a typical month, with Day 1 being the day a bill is issued, please provide the percentage of residential accounts making payments by day through Day 30. If reporting of such data is only by a time period other than a day (e.g., weekly), provide by the reporting by that time period.
22. Please provide a detailed explanation of the ratemaking treatment of late fee revenue.
 - a. Indicate late fee revenue is apportioned between customer classes;
 - b. Indicate how late fee revenue is reflected in the determination of a class rate of return.
 - c. Provide the residential class rate of return with and without taking late fee revenue into account.
23. Please identify all FERC 900 accounts that include expenses for the following residential collection activities:
 - a. Late payment notices;
 - b. Notices of disconnection for nonpayment.
 - c. Disconnections for nonpayment.
 - d. Field collections not involving disconnection for nonpayment.

Separate these expenses by sub-accounts if available.

24. For Fiscal Year 2005, 2006, 2007 and 2008 to date, please provide period-end totals of collection expenses booked to each account and sub-account identified in the Data Requests immediately above.
25. For Fiscal Years 2005, 2006, 2007 and 2008, please provide a copy of all PGE budget documents specifically identifying collection activities as a separately stated line-item.
 - a. Provide those budget documents indicating the budgeted expenditures year-to-date;
 - b. Provide those budget documents, if different, of actual expenditures year-to-date.
26. Please provide the most recent fully-embedded cost-of-service study allocating expenses and revenues between customer classes, including total dollars of expenses, expense and revenue allocators, the derivation of such allocators, and the allocated dollars of expenses and revenue by customer class.
27. Please provide a single copy of all studies within the custody or control of the Company documenting the effectiveness of a late payment charge as an incentive to pay for residential utility customers.
 - a. Provide all such studies performed using Company data;
 - b. Provide all such studies performed using data for utilities other than the Company.
28. Please provide a single copy of all studies within the custody or control of the Company documenting the effectiveness of a late payment charge as an incentive to pay for low-income residential utility customers.

- a. Provide all such studies performed using Company data;
 - b. Provide all such studies performed using data for utilities other than the Company.
29. Please provide a list of all circumstances other than full payment of a bill that stop the collection process for Company residential customers (e.g., entering into a deferred payment plan, filing a medical certificate, the winter shutoff moratorium).
30. Please provide a list of all circumstances other than full payment of a bill that stop or prevent the imposition of a late payment charge on a residential account in arrears.
31. Please provide by month for each month October 2005 to present:
 - a. the interest rate paid on credit balances for residential accounts using levelized monthly Budget Billing.
 - b. the interest rate charged on account balances for residential accounts using levelized monthly Budget Billing.
32. Please provide a list of all policies establishing whether or not residential customers may or may not enter into a levelized monthly Budget Billing plan (e.g., customer must have been a customer for at least 12-months; customer may not be in arrears; etc.).
33. Please provide the number of residential accounts using levelized monthly Budget Billing by month for each month October 2005 to present. For each month:
 - a. Provide the total number of customers on Budget Billing;
 - b. Provide the total number of customers newly entering into a levelized Budget Billing plan that month;
 - c. Provide the total number of customers removed from Budget Billing for collection-related reasons (i.e., having incurred an arrears);
 - d. Provide the total number of customers with credit balances in that month;
 - e. Provide the total number of customers with positive balances in that month.
34. For each month October 2005 to present, please provide:
 - a. the interest rate paid on residential cash security deposits by month;
 - b. the number of residential accounts for whom cash security deposits were held;
 - c. the dollar amounts of cash security deposits held for residential customers; and
 - d. the dollars of interest paid in interest on residential cash security deposits by month for each month October 2005 to present.
35. Please provide a copy of all written documents that explain, assess or otherwise discuss the criteria the Company uses to assess on an ongoing basis the effectiveness of its current credit and collection activities.
36. Please provide any written assessment, evaluation, report or other written document of any nature prepared since January 1, 2005 which discusses the effectiveness of the Company's current credit and collection activities.

37. Identify the current organizational structure which provide all credit and collection services, including in-house and outside individuals, departments, and organizations with current staffing and funding levels.
38. State the total budgeted collection costs for each fiscal year 2005 to current inclusive, separated by residential and non-residential accounts, associated with handling delinquent accounts, excluding administrative and overhead expenses.
39. State the total actual collection costs for each fiscal year 2005 to current inclusive, separated by residential and non-residential accounts, associated with handling delinquent accounts, excluding administrative and overhead expenses.
40. For each month since October 2005, please provide the number of each of the following for residential accounts:
 - a. Disconnection of service for nonpayment;
 - b. Written disconnect notice (mailed);
 - c. Written disconnect notice (posted) (e.g., door hanger);
 - d. The reconnection of service;
41. For each month October 2005 to present, please provide:
 - a. the total number of residential customers, by month, broken down by tariff class; and
 - b. the average bill for a customer taking service broken down by tariff class.
42. Please provide all written studies currently within the custody or control of the Company, whether or not prepared by or for the Company, that explicitly assess the extent to which the following activities reduce residential bad debt:
 - a. Cash security deposits;
 - b. Deferred payment agreements;
 - c. Disconnections for nonpayment;
 - d. Field collections;
 - e. Call center collection calls;
 - f. Late payment charges.
43. Please provide all written studies currently within the custody or control of the Company, whether or not prepared by or for the Company, that explicitly assess the extent to which the following activities reduce residential arrears:
 - a. Cash security deposits;
 - b. Deferred payment agreements;
 - c. Disconnections for nonpayment;
 - d. Field collections;
 - e. Call center collection calls;
 - f. Late payment charges.
44. For each of the years 2005 to present, inclusive, provide the total billing by month and the rate at which the billings in each month are converted into receipts, in substantially the following form:

Month	\$s of Billed Revenue	Collected Receipts in Dollars													
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	After Dec	Total
JAN															
FEB		---													
MAR		---	---												
APR		---	---	---											
MAY		---	---	---	---										
JUN		---	---	---	---	---									
JUL		---	---	---	---	---	---								
AUG		---	---	---	---	---	---	---							
SEP		---	---	---	---	---	---	---	---						
OCT		---	---	---	---	---	---	---	---	---					
NOV		---	---	---	---	---	---	---	---	---	---				
DEC		---	---	---	---	---	---	---	---	---	---	---			

45. Please provide any and all price elasticity studies in the possession or control of the Company, whether or not done specifically for the Company, regarding long- and/or short-term price elasticities for the following:
 - a. Residential customers as a whole;
 - b. Low-income residential customers;
 - c. Low-use residential customers, irrespective of income.

46. Please provide the following information for each month from October 2005 to the present:
 - a. Total residential billings attributable to usage and fixed monthly service charges (this question does *not* request a separate statement of utility bills for usage and fixed monthly customer charges);
 - b. Total residential receipts from usage and fixed monthly service charges;
 - c. Total residential receipts from late payment charges;
 - d. Total residential receipts from miscellaneous customer service charges (e.g., field collection charges, disconnect/reconnect fees, service connect fees, etc.) other than late payment fees;
 - e. Total residential revenue (if this figure is different from the sum of b, c and d).

47. Please provide the following information: A single copy of the most recent copy of all reports, compilations, memos or other written document of any nature, including any electronic compilation not committed to paper, routinely (e.g., daily, weekly, monthly, quarterly, annually) generated and filed with the Oregon Commission regarding residential:
 - a. Customers or dollars in arrears;
 - b. Disconnections for nonpayment;
 - c. Reconnections;
 - d. Deferred payment arrangements;
 - e. Collection activities;
 - f. Call center activity;
 - g. Uncollectibles;
 - h. Billings;
 - i. Receipts;
 - j. Deposits held;

- k. Deposits applied against accounts;
 - l. Final bills;
 - m. Levelized budget billing;
 - n. Any other indicator of residential billings; residential collections, residential customer payment or nonpayment.
48. Please provide the following information: A single copy of the most recent copy of all reports, compilations, memos or other written document of any nature, including any electronic compilation not committed to paper, routinely (e.g., daily, weekly, monthly, quarterly, annually) generated internally but not filed with the Oregon Commission regarding:
- a. Customers or dollars in arrears;
 - b. Disconnections for nonpayment;
 - c. Reconnections;
 - d. Deferred payment arrangements;
 - e. Collection activities;
 - f. Call center activity;
 - g. Uncollectibles;
 - h. Billings;
 - i. Receipts;
 - j. Deposits held;
 - k. Deposits applied against accounts;
 - l. Final bills;
 - m. Levelized budget billing;
 - n. Any other indicator of residential billings, residential collections, residential customer payment or nonpayment.
49. For each document provided in response to the two data requests immediately above, in addition to providing the date of the document provided, please indicate the frequency at which the document is generated.
50. Please provide an explanation and detailed description of how residential late fees are allocated in PGE's cost-of-service study.
51. Please identify for each month, starting in October 2005 through to the present the number of budgeted PGE job positions whose job description would or may include the task of disconnecting residential service for nonpayment. If a count of budgeted job positions is available on some periodic basis other than by month, identify the count by the most frequent period available (e.g., provide annual data, but only if a count on something more frequent than annually is not available).
52. Please provide any documents, analyses or reports which could be used to determine the field staff capacity (*i.e.*, full-time equivalents) needed to perform all the residential service disconnections for nonpayment scheduled:
- a. By week;
 - b. By month; and

- c. By year.
53. Please provide all documents, analyses or reports that address, concern or refer to the work that PGE field personnel will do, could do, or may do, during the months of the Oregon winter shutoff moratorium instead of performing the disconnection of residential service for nonpayment.
54. Please identify any documents, analyses or reports that address, concern or refers to the scheduling or appointing of staff to perform residential service disconnections for nonpayment during the peak months of residential shutoffs.
55. Please identify any documents, analyses or reports prepared, modified or used since October 2005, that addresses, concerns or refers to:
- Changes in collection procedures during the months of peak service disconnections;
 - Changes in the decision rule on whether and/or when to perform certain collection activities during the months of peak service disconnections;
 - Changes in collection practices or procedures of any sort that are adopted during the months of peak service disconnection.
 - Changes in staffing levels or staffing scheduling during the months of peak service disconnections.
56. Please explain and describe in detail any and all aspects of a residential service disconnection for nonpayment that would distinguish the task from the residential disconnection of service for any other reason.
57. Please provide any documents, analyses or reports prepared by or for PGE that indicates, evaluates or otherwise discusses the amount which residential arrears must reach in order for PGE to cost-effectively disconnect service due to the arrearage.
58. Please provide any documents, analyses or reports, not already provided in response to the request immediately above, which are in the custody or control of PGE, regardless of whether the documents or information contained therein was prepared by or for PGE, that indicates, evaluates, discusses, concerns or addresses in any way the amount which residential arrears must reach in order for PGE to cost-effectively disconnect service due to the arrearage.
59. Please provide a copy of any and all labor agreements that include any reference to the disconnection of service for nonpayment by company personnel.
60. Please provide for each month October 2005 to present:
- The detailed monthly budgets for each department, office, workgroup or other functioning unit of the Company, by whatever name, preparing a detailed budget, involved with residential collections; and
 - The detailed monthly financial reports submitted to Company fiscal personnel, by (or prepared for) each department, office, workgroup or other functioning units of the Company, by whatever name, involved with residential collections.

If monthly budgets and/or financial reports are not available, provide what is available (e.g., annual, quarterly) using the most commonly-generated report (e.g., monthly over quarterly, quarterly over annual, etc.).

61. Please explain and describe in detail the job description for each employee whose reasonably expected typical duties would include the process of disconnecting service for nonpayment. Please include any documents, analyses or reports that address, concern or refer to the job description.
62. Please provide a single copy of all reports, studies, evaluations, memos or other written document of any nature, whether or not prepared for the Company, documenting the number and/or percentage of households in Oregon owning credit cards.
63. Please provide a single copy of all reports, studies, evaluations, memos or other written documents of any nature, whether or not prepared for the Company, documenting the number and/or percentage of credit card holders in Oregon that carry positive balances from month-to-month on their credit cards.
64. Please provide a single copy of all reports, studies, evaluations, memos or other written documents of any nature, whether or not prepared for the Company, documenting statistics of credit card holders in Oregon relating to:
 - a. The penetration of credit card ownership by income;
 - b. The penetration of credit card ownership by poverty level;
 - c. The penetration of credit card debt by income;
 - d. The penetration of credit card debt by poverty level;
 - e. The penetration of credit card ownership by any other demographic characteristics of the cardholder;
 - f. The penetration of credit card debt by any other demographic characteristics of the cardholder.
65. Please identify all United States investor-owned electric and/or natural gas utilities that impose a residential late payment charge. For each such utility, provide:
 - a. Whether the late fee is a cost-based charge;
 - b. The level of 60-day residential arrears as of the most recent reporting period available (specifying the reporting period);
 - c. The rate of residential gross write-offs for the most recent reporting period available (specifying the reporting period).
66. Please provide all studies, memos, evaluations or other written documents of any nature that document the difference in effectiveness of a utility residential late payment fee in reducing residential arrears given an annual late payment charge of:
 - a. Less than 0.75 percent per month (9% per year);
 - b. 0.75 percent per month (9% per year);
 - c. 1.0 percent per month (12% per year);
 - d. 1.25 percent per month (15% per year);
 - e. 1.5% per month (18% per year); and

- f. More than 1.5% per month (18% per year).
67. Please provide all studies, memos, evaluations or other written documents of any nature that document the difference in effectiveness of a utility residential late payment fee in reducing uncollectible dollars from residential utility bills given an annual late payment charge of:
- a. Less than 0.75% per month (9% per year);
 - b. 0.75 percent per month (9% per year);
 - c. 1.0 percent per month (12% per year);
 - d. 1.25 percent per month (15% per year);
 - e. 1.5% per month (18% per year);
 - f. More than 1.5% per month (18% per year).
68. Please provide all data in the custody or control of the Company that documents typical residential interest rates on credit card balances since January 1, 2005.
69. Please provide the following information: A list of the names and addresses of locations where a residential customer can make a cash payment toward his or her bill at present.
70. Please provide complete residential tariff sheets, if any, for each and every one of the following:
- a. Late fees;
 - b. Deposits;
 - c. Bad check fees;
 - d. Disconnect/reconnect fees (for nonpayment);
 - e. New service connection fees;
 - f. Field collection fees;
 - g. Any and all other charges for residential customers.
71. For each fee for which a tariff page was provided, please provide:
- a. The total residential revenue by year for 2005 to present generated by that fee;
 - b. The ratemaking treatment of that revenue; and
 - c. The proposed ratemaking treatment of that revenue in this proceeding.
72. For each fee for which a tariff page was provided, please a line-item explanation of how each expenses recovered through the fee would have been allocated to the residential class in the absence of recovering the expense through the specific fee. In this explanation, provide a specific identification of the specific allocator that would have been used to allocate the expenses in the absence of the fee.
73. For each fee for which a tariff page was provided immediately above, provide a detailed explanation of how the expenses collected through that fee are removed from the expenses otherwise allocated to the residential kWh charge in the Company's allocated cost of service study. In providing this description, provide a specific reference, by line number and page number, to the Company's allocated cost of service study at which

place the expenses have been removed from those expenses otherwise allocated to the residential class.

74. Please provide a list of:
 - a. Each incorporated community served by the Company, along with the number of residential customers served in that community.
 - b. Each county served by the company, along with the number of residential customers served in that county.

75. Please provide a comprehensive list of the options that a residential customer of the Company has to pay his or her utility bill. The list of payment options should include, if available, payment through a third party authorized community pay station (or payment center). In addition, for each option:
 - a. for each month January 1, 2005 to present, please provide the number of payments received through each option;
 - b. indicate the fee, if any, which is imposed to utilize that option;
 - c. provide a detailed cost justification for that fee;
 - d. for each year 2005 to present, please provide the dollars generated by such fee.

76. Please provide a list of all Company committees, boards or other institutions within the Company which has a member that is either a low-income consumer or is a present staffmember or board member for a community action agency (CAA), community development corporation (CDC), community housing development organization (CHDO), community-based anti-poverty organization, community-based neighborhood association, or other community-based organization whose primary mission is directed toward anti-poverty initiatives. For each such committee, board or institution identified, provide the name and business address of the member that fits the above description and the position which that person holds.

77. Please provide a detailed narrative of the history of Company involvement in anti-poverty initiatives in its service territory for the years 2005 to present. This list should include a detailed description of such involvement along with the dates during which such involvement occurred.

78. Please indicate whether, within the time period from January 1, 2005 to the present, the Company has operated one of the following programs:
 - a. An internal budget counseling program directed to low-income customers;
 - b. An internal case management program directed to low-income customers;
 - c. A Gatekeeper Program;
 - d. A "pick-a-date" program through which a residential customer can select the day of the month on which his or her bill payment will be due.

79. For any program identified in the preceding question as having been in operation within the specified time period, please indicate whether that program is still in operation. Please list separately those programs no longer in operation, and for each program no longer in operation, please explain the rationale for ending that program.

80. Please provide all information within the custody and control of the Company regarding available alternatives to the use of payday loan stores as PGE customer pay stations.
81. Please provide a complete list of all PGE authorized customer pay stations that are registered with the state of Oregon or any other financial services regulator a authorized to offer payday loans to their customers.
82. Please provide any memo, report, evaluation or other written document of any nature that has considered, evaluated, discussed or otherwise referenced the use of PayScanAmerica as a payment alternative.
83. Separately provide any memo, report, evaluation, or other written document of any nature that has considered, evaluated, discussed or otherwise referenced the use of any firm that provides services similar to those provided by PayScanAmerica as a payment alternative.
84. Please provide the most recent study showing the month-by-month load curve:
 - a. For residential customers as a whole for a complete 12-month period;
 - b. For each residential tariff class for a complete 12-month period;
 - c. For residential LIHEAP recipients for a complete 12-month period;
 - d. For low-income customers, whether or not such customers are recipients of LHEAP; and
 - e. For low-use residential customers, using whatever definition of “low-use” has been utilized by PGE.
85. Please provide a copy of any study, memo, evaluation or analysis of any nature that discusses, assesses or otherwise considers the differences in the load curve for residential customers depending on the:
 - a. The monthly kWh consumption of the customer;
 - b. The annual kWh consumption of the customer;
 - c. The income of the customer.
86. Regarding the electricity usage of residential customers:
 - a. For each of the last 12 months, please separately provide the numbers of Residential LIHEAP customers with monthly usage levels as follows:
 - (i) At or below 200 kWh,
 - (ii) Between 200 and 250 kWh;
 - (iii) Between 250 and 300 kWh;
 - (iv) Between 300 and 350 kWh;
 - (v) Between 350 and 400 kWh;
 - (vi) Between 400 and 450 kWh;
 - (vii) Between 450 and 500 kWh;
 - (viii) Between 500 and 550 kWh;
 - (ix) Between 500 and 600 kWh;
 - (x) Between 600 and 650 kWh;
 - (xi) Between 650 and 700 kWh;

- (xii) Between 700 and 750 kWh;
 - (xiii) Between 750 and 800 kWh;
 - (xiv) Between 800 and 850 kWh;
 - (xv) Between 850 and 900 kWh;
 - (xvi) Between 900 and 950 kWh;
 - (xvii) Between 950 and 1000 kWh;
 - (xviii) Between 1000 and 1100 kWh;
 - (xix) Between 1100 and 1200 kWh;
 - (xx) Between 1200 and 1400 kWh;
 - (xxi) Between 1400 and 1600 kWh;
 - (xxii) Between 1600 and 1800 kWh;
 - (xxiii) Between 1800 and 2000 kWh; and
 - (xxiv) Above 2000 kWh.
- b. Provide the same data as requested immediately above, except for residential customers as a whole
87. For each usage band identified in the immediately preceding data request, provide a sample monthly billing calculation:
- a. At existing standard residential rates; and
 - b. At the standard residential rates as proposed by the Company in this proceeding.

Dated this ____ day of April, 2008.

Respectfully submitted,

Jim Abrahamson
Community Action Partnership of Oregon
P.O. Box 7964
945 Columbia Street NE
Salem, OR 97301
Jim@caporegon.org