June 8, 2023

## VIA ELECTRONIC DELIVERY

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
11331 W Chinden Blvd.
Building 8 Suite 201A
Boise, ID 83714

## Re: CASE NO. PAC-E-23-12 <br> FORMAL COMPLAINT OF SHERRY COLE

Dear Ms. Noriyuki:

Please find Rocky Mountain Power's Answer in the above referenced matter.
Informal inquiries may be directed to Mark Alder, Idaho Regulatory Manager at (801) 220-2313.
Very truly yours,



Noelle Steward
Senior Vice President of Regulation and Customer/Community Solutions

Joe Dallas (ISB\# 10330)
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (360) 560-1937
Email: joseph.dallas@pacificorp.com
Attorney for Rocky Mountain Power

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

|  |  |
| :--- | :--- |
| FORMAL COMPLAINT OF SHERRY | CASE NO. PAC-E-23-12 |
| COLE VS PACIFICORP D/B/A ROCKY |  |
| MOUNTAIN POWER |  |

## ANSWER AND MOTION TO DISMISS

1. In accordance with Rule 57 of the Rules of Procedure of the Idaho Public Utilities Commission ("Commission"), Rocky Mountain Power, a division of PacifiCorp ("Rocky Mountain Power" or the "Company") hereby provides its answer to the formal complaint ("Complaint") filed by Sherry Cole ("Complainant" or "Ms. Cole") with the Commission on April 4, 2023. In addition, the Company moves to dismiss the Complaint in its entirety because Complainant has failed to state a claim upon which relief can be granted. Complainant has not alleged that Rocky Mountain Power violated any specific statute, administrative rule, Commission order, or Company tariff in resolving the billing errors at issue in this proceeding.
2. Communications regarding this Case should be addressed to:

By e-mail (preferred):
datarequest@pacificorp.com
joseph.dallas@pacificorp.com
mark.alder@pacificorp.com
By mail: Data Request Response Center
Rocky Mountain Power
825 NE Multnomah St., Suite 2000
Portland, OR 97232

Mark Alder<br>Idaho Regulatory Affairs Manager<br>Rocky Mountain Power<br>1407 West North Temple, Suite 330<br>Salt Lake City, Utah 84116<br>Telephone: (801) 220-2313<br>Email: mark.alder@pacificorp.com<br>Joe Dallas (ISB\# 10330)<br>Senior Attorney<br>Rocky Mountain Power<br>825 NE Multnomah, Suite 2000<br>Portland, OR 97232<br>Telephone: (360) 560-1937<br>Email: joseph.dallas@pacificorp.com

## I. INTRODUCTION

3. The Complainant alleges that the Company owes her $\$ 1170.08$ for charges that were mistakenly billed to her due to an error in calculating her billing based on her neighbor's meter. According to the Complainant, her meter and her neighbor's meter were initially crossed approximately 5 years ago. The Company initially credited Ms. Cole's account with $\$ 1850.52$ in error, believing that her meter was indeed crossed with her neighbor's. However, a subsequent breaker test conducted by the Company confirmed that Ms. Cole's meter is accurately associated with her own account. Consequently, the Company reversed the initial credit of $\$ 1850.52$, but provided a goodwill compensation of $\$ 450$ to address the inconvenience caused by the bill credit and reversal. The Company has carefully reviewed and verified that Ms. Cole has been appropriately billed for the electric usage associated with her account. Throughout this process, the Company has acted in good faith and in accordance with its tariffs, specifically Electric Service Regulation No. 7(a), which allows the Company to rectify certain billing errors. Therefore, based on the foregoing and the Company's adherence to its applicable tariffs, the Rocky Mountain Power respectfully requests that the Complaint be dismissed.

## II. BACKGROUND INFORMATION ON BILLING ERROR

4. The following is a timeline of events:

- January 3, 2023: Ms. Cole contacted the Company and expressed her belief that her meter was crossed with her neighbor's meter. In response, the Company's customer service agent initiated a work order to have her meter checked.
- January 13, 2023: The Company's meter reader visited the location to inspect the meters. However, during this visit, the meter reader misunderstood the purpose of the visit and did not conduct a breaker test to electrically verify if the meters were crossed. A breaker test is a procedure performed to determine whether there is a crossconnection or misalignment in the electrical wiring between meters. It involves temporarily disconnecting the electrical supply to each meter and observing any impact on neighboring meters to identify potential cross-connections. The main service disconnect breaker is utilized, if available, to turn off the electrical supply downstream from a specific meter, allowing an individual to assess what is served (or not served) by that meter. This helps in identifying any cross-connections or misalignments in the electrical wiring between meters. Instead of conducting a breaker test, the meter reader concluded that the meters were crossed based on a visual inspection of the meters and information provided by Ms. Cole.
- January 25, 2023: Based on the information provided by the meter reader, the Company's billing agent made adjustments to the billing. ${ }^{1}$ The adjustment was made pursuant to Electric Service Regulation No. 7(a) which states that the corrected billing

[^0]should not exceed six months if the time when the malfunction or error began cannot be reasonable determined. However, the billing agent made a seven-month adjustment, ${ }^{2}$ reconciling the neighbor's and Ms. Cole's meter. As a result, Ms. Cole received a bill on January 30, 2023, which removed $\$ 1,857.20$ in charges and added $\$ 600.75$ in charges, resulting in net credit of $\$ 1,256.45$ for the period from June 2022 to December 2022. The January 30, 2023 bill, detailing these adjustments, is attached to this Answer as Confidential Exhibit No. 1 - Customer Bills.

- February 8, 2023: A Company meter reader revisited the property and conducted a breaker test, which confirmed that the meters were not crossed.
- February 20, 2023: The initial billing adjustment made on January 30, 2023, was reversed which removed $\$ 596.20$ in charges and added $\$ 1850.52$ in charges resulting in $\$ 1,254.20$ net credit reversal for the months from June 2022 to December 2022. The net credit reversal was $\$ 2.25$ less than the net credit due to the Company's system which automatically calculates prorations when making monthly adjustments. The details of this adjustment are included with Ms. Cole's February 28, 2023 billing statement which is included in Confidential Exhibit No. 1 - Customer Bills. The calculation for the net credit and net credit reversal are attached as Exhibit No. 2 - Credit Reversal Calculations.
- On March 2, 2023, Ms. Cole contacted the Company after receiving the adjusted bill. She was extremely upset and wanted the charges removed. The Company's billing agent attempted to explain the reason for the reversal, but Ms. Cole was convinced that

[^1]the meters were crossed and believed she had been paying for her neighbor's bill for years. She expressed she would contact the public utility commission and ended the phone call.

- March 13, 2023: A Company meter reader revisited the location once again and verified that the meters were not crossed by conducting a second breaker test. The meter reader performed the breaker test to ensure the accuracy of the meter readings. During this visit, Ms. Cole was present at home and was informed about the results of the breaker test.
- March 15, 2023: The Company credited Ms. Cole with a goodwill credit of $\$ 450$ for the inconvenience caused by the bill credit and reversal. The credit is on Ms. Cole's March 29, 2023 billing statement which is included with Confidential Exhibit No. 1 Customer Bills.
- May 17, 2023: The Company confirmed electronic receipt of Complainant's Complaint from Staff and notification that the Company would have 21 days from May 18, 2023, to respond to the Complaint.


## III. ANSWER TO COMPLAINANT'S ALLEGATIONS

5. On January 30, 2023, a credit of $\$ 1,256.45$ was applied to Ms. Cole's bill in accordance with Electric Service Regulation No. 7(a). The rule specifies that corrected billing should not exceed six months if the time when the malfunction or error began cannot be reasonable determined. The credit was initially given based on the assumption that Ms. Cole's meter was crossed with her neighbor's. However, a breaker test performed by the Company confirmed that Ms. Cole's meter was never actually physically crossed with her neighbor's. Therefore, the credit of $\$ 1,256.45$ credit was given in error and was subsequently reversed by the Company. The

Company acknowledges that there was an initial error during the January 13 visit when the meter reader relayed the incorrect information to the customer service representative. As a gesture of goodwill, the Company credited Ms. Cole $\$ 450$ for the inconvenience caused by the credit and its subsequent reversal. The Company recognizes that utility bills can be a substantial fixed costs for its customers and expresses regret for the initial billing error made in this case.
6. Electric Service Regulation No. 7(a) specifically anticipates the occurrence of billings errors during operations and outlines the appropriate procedures to follow once an error is discovered. The Company has acted in good faith and in accordance with this rule throughout the entire process. ${ }^{3}$ Furthermore, after thorough investigation, the Company has confirmed that Ms. Cole's meter is not crossed with her neighbor's meter. Both Ms. Cole and her neighbor are being billed appropriately for their electric usage. The verification of the meters through the breaker tests confirmed that the billing is accurate and reflective of their actual electricity consumption. Moreover, the Company has already provided the customer with an adequate credit to address the inconvenience caused by the billing error. Granting any additional credits or compensation to the customer would result in an excessively large credit, which would not be aligned with Rocky Mountain Power's ability to effectively and reliably serve all of its customers in a cost-effective manner. Consequently, the Company respectfully requests that the relief sought in the Compliant be denied based on its compliance with Electric Service Regulation No. 7(a), confirmation of meter accuracy, and the credit already provided to address the initial billing error.

## IV. MOTION TO DISMISS

7. Rocky Mountain Power incorporates by reference paragraphs 4 through 6 as if set forth herein.

[^2]8. Based on the foregoing, Rocky Mountain Power moves to dismiss the Complaints under Rule 256 of the Rules of Procedure of the Idaho Public Utilities Commission for failure to state a claim. The Complainant has not identified any specific administrative rule, order, statute, or applicable provision of the Company's tariff that Rocky Mountain Power violated. The Company has acted in accordance with Electric Service Regulation No. 7(a) to rectifying the billing error identified in this case. Additionally, the Company has conducted thorough verification confirming that the customer's meter is not crossed with her neighbor's and has already provided the customer with an appropriate credit to address the inconvenience caused by the billing error. Accordingly, the Company requests that the Commission dismiss the Complaint with prejudice.

## V. CONCLUSION

9. For the foregoing reasons, the Company requests that the Commission deny the relief sought in the Compliant and dismiss the Complaint with prejudice.

DATED this 8th day of June, 2023.
Respectfully submitted,
ROCKY MOUNTAIN POWER


Joe Dallas (ISB\# 10330)
Senior Attorney
Rocky Mountain Power
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: (360) 560-1937
Email: joseph.dallas@pacificorp.com
Attorney for Rocky Mountain Power

## REDACTED EXHIBIT 1

## REDACTED

SHERRY COLE
FRANCISCO L SANTIBANEZ
SAINT ANTHONY ID 83445-1752

ROCKY MOUNTAIN POWER
1-888-221-7070
24 hours a day,
7 days a week rockymountainpower.net

## 

Your Balance With Us

| Previous Account Balance | 365.53 |
| :--- | ---: |
| Payments/Credits | -150.00 |
| New Charges | +669.18 |
| Adjustments | $-1,857.20$ |
| Current Account Balance | $\mathbf{- \$ 9 7 2 . 4 9}$ |

Payments Received

| DATE | DESCRIPTION | AMOUNT |
| :--- | :--- | ---: |
| Jan 3, 2023 | Payment Received - Thank You | 150.00 |
| Total Payments | $\mathbf{\$ 1 5 0 . 0 0}$ |  |

Note: One or more of your services has been adjusted. If you would like more information or have any questions, please call us anytime toll free at 1-888-221-7070.

## Detailed Account Activity

| ITEM 6 -ELECTRIC SERVICE |  |  | Residential Schedule 1 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{array}{\|l\|} \hline \text { METER } \\ \text { NUMBER } \end{array}$ | SERVICE PERIOD From | To | ELAPSED | $\begin{array}{\|l\|} \hline \text { METER } \\ \text { Previou } \end{array}$ | Current | $\begin{aligned} & \text { METER } \\ & \text { MULTIPLIER } \end{aligned}$ | AMOUNT USED THIS MONTH |
| 342852591 | May 25, 2022 | May 26, 2022 | 1 | 5971 | 6016 | 1.0 | 45 kwh |

Current Month Estimated. Your bill may not reflect actual usage.

| NEW CHARGES 05/22 | UNITS | COST PER UNIT | CHARGE |
| :--- | :--- | :--- | ---: |
| CLOSING CHARGES |  |  |  |
| Basic Charge - Single Phase for 1 day(s) |  |  | 0.27 |
| Energy Charge Winter Block 1 for 1 day(s) | 33 kwh | 0.0933050 | 3.08 |
| Energy Charge Winter Block 2 for 1 day(s) | 12 kwh | 0.1091650 | 1.31 |
| Energy Cost Adjustment for 1 day(s) | 45 kwh | 0.0035400 | 0.16 |
| Customer Efficiency Services |  | 0.0225000 | 0.11 |
| Tax Act Adjustment for 1 day(s) | 45 kwh | -0.0018200 | -0.08 |
| B PA Columbia River Benefits for 1 day(s) | 45 kwh | -0.0101330 | -0.46 |

Write account number on check \& mail to: Rocky Mtn Power, PO Box 26000, Portland, OR 97256-0001 RETAIN THIS PORTION FOR YOUR RECORDS.

RETURN THIS PORTION WITH YOUR PAYMENT

## ROCKY MOUNTAIN

 POWERро вох 400
PORTLAND OR 97207

$$
\begin{aligned}
& \text { ROCKY MTN POWER } \\
& \text { PO BOX } 26000 \\
& \text { PORTLAND OR 97256-0001 } \\
& \text { | }
\end{aligned}
$$ POWER

REDACTED

BILLING DATE: Jan 30, $\mathbf{2 0 2 3}$ ACCOUNT NUMBER: 75048095-001 $\mathbf{3}$ DUE DATE: Feb 25, $\mathbf{2 0 2 3}$ AMOUNT DUE: $\mathbf{\$ 0 . 0 0}$

| new charges 05/22 continued | UnITS | COST PER UNIT | Charge |
| :---: | :---: | :---: | :---: |
| St Anthony Franchise Fee |  | 0.0100000 | 0.04 |
| Total New Charges |  |  | 4.43 |
| adjustments |  |  | Charge |
| 05/22 Fee Waived |  |  | -1.35 |
| 06/22 Billed From Incorrect Meter 05/25/22-06/24/22 |  |  | -122.11 |
| 06/22 Fee Waived |  |  | -0.65 |
| 07/22 Billed From Incorrect Meter 06/24/22-07/27/22 |  |  | -213.31 |
| 08/22 Billed From Incorrect Meter 07/27/22-08/25/22 |  |  | -149.61 |
| 09/22 Billed From Incorrect Meter 08/25/22-09/26/22 |  |  | -159.55 |
| 10/22 Billed From Incorrect Meter 09/26/22-10/25/22 |  |  | -209.09 |
| 11/22 Billed From Incorrect Meter 10/25/22-11/28/22 |  |  | -507.18 |
| 12/22 Adjusted Estimated Read 11/28/22-12/28/22 |  |  | -494.35 |
| Total Adjustments |  |  | -1,857.20 |



Next scheduled read date: 02-27. Date may vary due to scheduling or weather.

| new charges 01/23 | UNITS | COST PER UNIT | charge |
| :---: | :---: | :---: | :---: |
| Basic Charge - Single Phase |  |  | 8.00 |
| Energy Charge Winter Block 1 | 653 kwh | 0.0933050 | 60.93 |
| Energy Cost Adjustment | 653 kwh | 0.0073300 | 4.79 |
| Customer Efficiency Services |  | 0.0250000 | 1.84 |
| Tax Act Adjustment | 653 kwh | -0.0018200 | -1.19 |
| B P A Columbia River Benefits | 653 kwh | -0.0101330 | -6.62 |
| St Anthony Franchise Fee |  | 0.0100000 | 0.68 |
| Total New Charges |  |  | 68.43 |
| NEW CHARGES 12/22 | UNITS | COST PER UNIT | CHARGE |
| Basic Charge - Single Phase |  |  | 8.00 |
| Energy Charge Winter Block 1 | 685 kwh | 0.0933050 | 63.91 |
| Energy Cost Adjustment | 685 kwh | 0.0073300 | 5.02 |

Historical Data - ITEM 9


2022 J F M A M J JA S ON D J 2023

Your Average Daily kwh Usage by Month

| PERIOD ENDING | Jan 2023 | Jan 2022 |
| :--- | :---: | :---: |
| Avg. Daily Temp. | 21 | 17 |
| Total kwh | 653 | 0 |
| Avg. kwh per Day | 22 | 0 |
| Cost per Day | $\$ 2.28$ | $\$ 0.00$ |

## New Mailing Address or Phone?

Please print your new information below and check the box on
the reverse side of this Payment Stub. Thank you.
ACCOUNT NUMBER: 75048095-001 3
$\overline{\text { LAST }} \overline{\text { FIRST }} \overline{\text { M.I. }}$

NEW STREET ADDRESS

BILLING DATE: Jan 30, $\mathbf{2 0 2 3}$ ACCOUNT NUMBER: 75048095-001 $\mathbf{3}$ DUE DATE: Feb 25, $\mathbf{2 0 2 3}$ AMOUNT DUE: $\mathbf{\$ 0 . 0 0}$

| new Charges 12/22 continued | UNITS | COST PER UNIT | Charge |
| :---: | :---: | :---: | :---: |
| Customer Efficiency Services |  | 0.0250000 | 1.92 |
| Tax Act Adjustment | 685 kwh | -0.0018200 | -1.25 |
| B P A Columbia River Benefits | 685 kwh | -0.0101330 | -6.94 |
| St Anthony Franchise Fee |  | 0.0100000 | 0.71 |
| Total New Charges |  |  | 71.37 |
| new Charges 11/22 | UNITS | COST PER UNIT | CHARGE |
| Basic Charge - Single Phase |  |  | 8.00 |
| Energy Charge Summer Block 1 for 6 day(s) | 123 kwh | 0.1119660 | 13.77 |
| Energy Charge Winter Block 1 for 28 day(s) | 574 kwh | 0.0933050 | 53.56 |
| Energy Cost Adjustment | 697 kwh | 0.0073300 | 5.11 |
| Customer Efficiency Services |  | 0.0250000 | 2.01 |
| Tax Act Adjustment | 697 kwh | -0.0018200 | -1.27 |
| B P A Columbia River Benefits | 697 kwh | -0.0101330 | -7.06 |
| St Anthony Franchise Fee |  | 0.0100000 | 0.74 |
| Total New Charges |  |  | 74.86 |
| NEW Charges 10/22 | UNITS | COST PER UNIT | CHARGE |
| Basic Charge - Single Phase |  |  | 8.00 |
| Energy Charge Summer Block 1 | 534 kwh | 0.1119660 | 59.79 |
| Energy Cost Adjustment | 534 kwh | 0.0073300 | 3.91 |
| Customer Efficiency Services |  |  |  |
| for 25 day(s) |  | 0.0250000 | 1.55 |
| for 4 day(s) |  | 0.0225000 | 0.22 |
| Tax Act Adjustment | 534 kwh | -0.0018200 | -0.97 |
| B P A Columbia River Benefits | 534 kwh | -0.0101330 | -5.41 |
| St Anthony Franchise Fee |  | 0.0100000 | 0.67 |
| Total New Charges |  |  | 67.76 |
| NEW CHARGES 09/22 | UNITS | COST PER UNIT | CHARGE |
| Basic Charge - Single Phase |  |  | 8.00 |
| Energy Charge Summer Block 1 | 635 kwh | 0.1119660 | 71.10 |
| Energy Cost Adjustment | 635 kwh | 0.0073300 | 4.65 |
| Customer Efficiency Services |  | 0.0225000 | 1.88 |
| Tax Act Adjustment | 635 kwh | -0.0018200 | -1.16 |
| B P A Columbia River Benefits | 635 kwh | -0.0101330 | -6.43 |
| St Anthony Franchise Fee |  | 0.0100000 | 0.78 |
| Total New Charges |  |  | 78.82 |
| NEW Charges 08/22 | UNITS | COST PER UNIT | CHARGE |
| Basic Charge - Single Phase |  |  | 8.00 |
| Energy Charge Summer Block 1 | 700 kwh | 0.1119660 | 78.38 |
| Energy Charge Summer Block 2 | 158 kwh | 0.1309990 | 20.70 |
| Energy Cost Adjustment | 858 kwh | 0.0073300 | 6.29 |
| Customer Efficiency Services |  | 0.0225000 | 2.55 |
| Tax Act Adjustment | 858 kwh | -0.0018200 | -1.56 |
| B P A Columbia River Benefits | 858 kwh | -0.0101330 | -8.69 |
| St Anthony Franchise Fee |  | 0.0100000 | 1.06 |
| Total New Charges |  |  | 106.73 |
| NEW CHARGES 07/22 | UNITS | COST PER UNIT | CHARGE |
| Basic Charge - Single Phase |  |  | 8.00 |
| Energy Charge Summer Block 1 | 700 kwh | 0.1119660 | 78.38 |
| Energy Charge Summer Block 2 | 281 kwh | 0.1309990 | 36.81 |
| Energy Cost Adjustment | 981 kwh | 0.0073300 | 7.19 |
| Customer Efficiency Services |  | 0.0225000 | 2.93 |
| Tax Act Adjustment | 981 kwh | -0.0018200 | -1.79 |
| B P A Columbia River Benefits | 981 kwh | -0.0101330 | -9.94 |
| St Anthony Franchise Fee |  | 0.0100000 | 1.22 |
| Total New Charges |  |  | 122.80 |
| new charges 06/22 | UNITS | COST PER UNIT | CHARGE |
| Basic Charge - Single Phase for 29 day(s) |  |  | 7.73 |
| Energy Charge Summer Block 1 for 24 day(s) | 510 kwh | 0.1119660 | 57.10 |
| Energy Charge Winter Block 1 for 5 day(s) | 106 kwh | 0.0933050 | 9.89 |
| Energy Cost Adjustment for 24 day(s) | 510 kwh | 0.0073300 | 3.74 |

BILLING DATE: Jan 30, $\mathbf{2 0 2 3}$ ACCOUNT NUMBER: 75048095-001 $\mathbf{3}$ dUE DATE: Feb 25, $\mathbf{2 0 2 3}$ amOUNT DUE: $\mathbf{\$ 0 . 0 0}$

| NEW CHARGES 06/22 CONTINUED | UNITS | COST PER UNIT | CHARGE |
| :--- | :---: | ---: | ---: |
| for 5 day(s) | 106 kwh | 0.0035400 | 0.38 |
| Customer Efficiency Services |  | 0.0225000 | 1.77 |
| Tax Act Adjustment for 29 day(s) | 616 kwh | -0.0018200 | -1.12 |
| B P A Columbia River Benefits for 29 day(s) | 616 kwh | -0.0101330 | -6.24 |
| St Anthony Franchise Fee |  | 0.0100000 | 0.73 |
| Total New Charges |  | $\mathbf{7 3 . 9 8}$ |  |

When you provide a check as payment, you authorize us to use the information from your check either to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as we receive your payment and you will not receive your check back from your financial institution. If you would like to opt out of this program and continue processing your payment as a check transaction, please call 1-800-895-0561. If you have opted out previously, please disregard this message.

## Manage your account with ease

Popular billing options include Auto Pay, Equal Pay and choice of due dates. You can even earn a credit each month when you sign up for paperless billing. See details and enroll at rockymountainpower.net/billoptions

## Looking for other ways to pay?

Visit rockymountainpower.net/pay for all your options. You can choose to pay on your device using our mobile app, on our website, at a pay station in your community, or pay over the phone by calling 1-888-221-7070.

REDACTED
SHERRY COLE
FRANCISCO L SANTIBANEZ
SAINT ANTHONY ID 83445-1752


Questions: Call
1-888-221-7070
24 hours a day,
7 days a week rockymountainpower.net

## ו|

## Your Balance With Us

| Previous Account Balance | -972.49 |
| :--- | ---: |
| Payments/Credits | 0.00 |
| New Charges | +505.54 |
| Adjustments | $+1,621.08$ |
| Current Account Balance | $\mathbf{\$ 1 , 1 5 4 . 1 3}$ |

Payments Received

| DATE | DESCRIPTION | AMOUNT |
| :--- | :--- | :---: |
| Jan 30, 2023 | Payment Adjustment: Refund Pending Approval | $\mathbf{- 4 8 6 . 0 0}$ |
| Jan 30, 2023 | Payment Adjustment: Refund Pending Approval | $\mathbf{- 2 1 5 . 0 0}$ |
| Feb 3, 2023 | Payment Adjustment: Refund Applied to Account | 486.00 |
| Feb 3, 2023 | Payment Adjustment: Refund Applied to Account | 215.00 |
| Total Payments | $\mathbf{\$ 0 . 0 0}$ |  |

Note: One or more of your services has been adjusted. If you would like more information or have any questions, please call us anytime toll free at 1-888-221-7070.

## Detailed Account Activity

| ITEM 9 - ELECTRIC SERVICE |  |  | Residential Schedule 1 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| METER | SERVICE PERIOD From | To | $\begin{aligned} & \text { ELAPSED } \\ & \text { DAYS } \end{aligned}$ | METER Previous | Current | METER MULTIPLIER | AMOUNT USED THIS MONTH |
| 341834327 | Jan 27, 2023 | Jan 27, 2023 |  | 26042 | 26042 | 1.0 |  |
| 342852591 | Jan 28, 2023 | Feb 27, 2023 |  | 26042 | 30775 | 1.0 |  |
| Total |  |  | 31 |  |  | 4,733 kwh |  |

Next scheduled read date: 03-28. Date may vary due to scheduling or weather.

| NEW CHARGES 0223 | UNITS | COST PER UNIT | CHARGE |
| :--- | :---: | ---: | ---: |
| Basic Charge - Single Phase |  |  | 8.00 |
| Energy Charge Winter Block 1 | $1,000 \mathrm{kwh}$ | 0.0933050 | 93.31 |
| Energy Charge Winter Block 2 | $3,733 \mathrm{kwh}$ | 0.1091650 | 407.51 |
| Energy Cost Adjustment | $4,733 \mathrm{kwh}$ | 0.0073300 | 34.69 |
| Customer Efficiency Services | $4,733 \mathrm{kwh}$ | 0.0250000 | 13.59 |
| Tax Act Adjustment | $4,733 \mathrm{kwh}$ | -0.0018200 | -8.61 |
| B PA Columbia River Benefits | -0.0101330 | -47.96 |  |
|  |  |  | See reverse |

Write account number on check \& mail to: Rocky Mtn Power, PO Box 26000, Portland, OR 97256-0001 RETAIN THIS PORTION FOR YOUR RECORDS.

RETURN THIS PORTION WITH YOUR PAYMENT

## ROCKY MOUNTAIN

POWER
ро вох 400
PORTLAND OR 97207

$$
\begin{aligned}
& \text { ROCKY MTN POWER } \\
& \text { PO BOX } 26000 \\
& \text { PORTLAND OR 97256-0001 }
\end{aligned}
$$

Late Payment Charge for Idaho A late payment charge of $1 \%$ may be charged on the delinquent balance per month.

| Account Number: | 75048095-001 3 |
| :---: | :---: |
| Date Due: | Mar 25, 2023 |
| AMOUNT DUE: | \$1,154.13 |
| Please enter the amount enclosed. |  |
| SHERRY COLE <br> FRANCISCO L SANTIBANEZ |  |

BILLING DATE: Feb 28, 2023 ACCOUNT NUMBER: 75048095-001 3 dUE DATE: Mar 25, $\mathbf{2 0 2 3}$ amOUNT DUE: \$1,154.13

| NEW CHARGES O2/23 CONTINUED | UNITS | COST PER UNIT | CHARGE |
| :--- | ---: | ---: | ---: |
| St Anthony Franchise Fee | 0.0100000 | 5.01 |  |
| Total New Charges |  | $\mathbf{5 0 5 . 5 4}$ |  |


| ADJUSTMENTS | CHARGE |
| :--- | ---: |
| $01 / 23$ Billed From Incorrect Meter 12/28/22-01/27/23 | 366.88 |
| $06 / 22$ Billed From Incorrect Meter 05/26/22 -06/24/22 | 43.45 |
| $07 / 22$ Billed From Incorrect Meter 06/24/22-07/27/22 | 90.51 |
| 08/22 Billed From Incorrect Meter 07/27/22-08/25/22 | 42.88 |
| $09 / 22$ Billed From Incorrect Meter 08/25/22-09/26/22 | 80.73 |
| 10/22 Billed From Incorrect Meter 09/26/22-10/25/22 | 141.33 |
| $11 / 22$ Billed From Incorrect Meter 10/25/22-11/28/22 | 432.32 |
| $12 / 22$ Billed From Incorrect Meter 11/28/22-12/28/22 | 422.98 |
| Total Adjustments | $\mathbf{1 , 6 2 1 . 0 8}$ |

When you provide a check as payment, you authorize us to use the information from your check either to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as we receive your payment and you will not receive your check back from your financial institution. If you would like to opt out of this program and continue processing your payment as a check transaction, please call 1-800-895-0561. If you have opted out previously, please disregard this message.

## Manage your account with ease

Popular billing options include Auto Pay, Equal Pay and choice of due dates. You can even earn a credit each month when you sign up for paperless billing. See details and enroll at rockymountainpower.net/billoptions

Make a positive impact on the environment. Match all or part of your electricity usage with clean energy. Visit RockyMountainPower.net/BlueSky or call 1-800-769-3717 to learn more.

## Looking for other ways to pay?

Visit rockymountainpower.net/pay for all your options. You can choose to pay on your device using our mobile app, on our website, at a pay station in your community, or pay over the phone by calling 1-888-221-7070.

## New Mailing Address or Phone?

Please print your new information below and check the box on
the reverse side of this Payment Stub. Thank you.
ACCOUNT NUMBER: 75048095-001 3

| $\overline{\text { LAST }}$ |  | $\overline{\text { FIRST }}$ | $\overline{\text { M.I. }}$ |
| :--- | :--- | :--- | :--- |
| $\overline{\text { NEW STREET ADDRESS }}$ |  |  |  |
| $\overline{\text { CITY }}$ |  |  |  |
| $\overline{\text { ST }} \quad \overline{\text { ZIP }}$ |  |  |  |

## REDACTED

SHERRY COLE
FRANCISCO L SANTIBANEZ
SAINT ANTHONY ID 83445-1752


Questions: Call
1-888-221-7070
24 hours a day,
7 days a week rockymountainpower.net

## 

## Your Balance With Us

| Previous Account Balance | $1,154.13$ |
| :--- | ---: |
| Payments/Credits | -600.00 |
| Past Due Amount | $\mathbf{5 5 4 . 1 3}$ |
| New Charges | +371.07 |
| Current Account Balance | $\$ \mathbf{\$ 9 2 5 . 2 0}$ |

Payments Received

| DATE | DESCRIPTION | AMOUNT |
| :--- | :--- | ---: |
| Mar 3, 2023 | Payment Received - Thank You | 150.00 |
| Mar 15, 2023 | Good Will Payment | 450.00 |
| Total Payments | $\$ 600.00$ |  |

Detailed Account Activity

| ITEM 9 - ELECTRIC SERVICE |  |  | Residential Schedule 1 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{array}{\|l\|} \hline \text { METER } \\ \text { NUMBER } \end{array}$ | SERVICE PERIOD From | To | $\begin{array}{\|l\|} \hline \text { ELAPSED } \\ \text { DAYS } \\ \hline \end{array}$ | METER RE Previous | Current | METER MULTIPLIER | AMOUNT USED THIS MONTH |
| 342852591 | Feb 27, 2023 | Mar 28, 2023 | 29 | 30775 | 34218 | 1.0 | 3,443 kwh |

Next scheduled read date: 04-26. Date may vary due to scheduling or weather.

| nEw CHARGES $\mathbf{\text { 03/23 }}$ | UNITS | COST PER UNIT | CHARGE |
| :--- | :---: | ---: | ---: |
| Basic Charge - Single Phase |  |  | 8.00 |
| Energy Charge Winter Block 1 | $1,000 \mathrm{kwh}$ | 93.31 |  |
| Energy Charge Winter Block 2 | $2,443 \mathrm{kwh}$ | 0.0933050 | 266.69 |
| Energy Cost Adjustment | $3,443 \mathrm{kwh}$ | 0.1091650 | 9.24 |
| Customer Efficiency Services |  | 0.0073300 |  |
| Tax Act Adjustment | $3,443 \mathrm{kwh}$ | 0.0250000 | -6.27 |
| B P A Columbia River Benefits | $3,443 \mathrm{kwh}$ | -0.0018200 | -34.89 |
| St Anthony Franchise Fee |  | -0.0101330 | 3.62 |
| Late Payment Charge | 0.0100000 | 5.54 |  |
| Total New Charges | 0.0100000 | $\mathbf{3 7 1 . 0 7}$ |  |

When you provide a check as payment, you authorize us to use the information from your check either to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as we receive your payment and you will not receive your check back from your financial institution. If you would like to opt out of this program and

## See reverse

Write account number on check \& mail to: Rocky Mtn Power, PO Box 26000, Portland, OR 97256-0001
RETAIN THIS PORTION FOR YOUR RECORDS.

RETURN THIS PORTION WITH YOUR PAYMENT

## ROCKY MOUNTAIN

POWER
po box 400
PORTLAND OR 97207

ROCKY MOUNTAIN POWER

BILLING DATE:
Mar 29, 2023

| ACCOUNT NUMBER: | 75048095-001 3 |
| ---: | ---: |
| DUE DATE: | Apr 25,2023 |
| AMOUNT DUE: | $\$ 925.20$ |

## Historical Data - ITEM 9



Your Average Daily kwh Usage by Month

| PERIOD ENDING | MAR 2023 | MAR 2022 |
| :--- | :---: | :---: |
| Avg. Daily Temp. | 23 | 32 |
| Total kwh | 3443 | 0 |
| Avg. kwh per Day | 119 | 0 |
| Cost per Day | $\$ 12.60$ | $\$ 0.00$ |

## Manage your account with ease

Popular billing options include Auto Pay, Equal Pay and choice of due dates. You can even earn a credit each month when you sign up for paperless billing. See details and enroll at rockymountainpower.net/billoptions

Looking for other ways to pay?
Visit rockymountainpower.net/pay for all your options. You can choose to pay on your device using our mobile app, on our website, at a pay station in your community, or pay over the phone by calling 1-888-221-7070.

Late Payment Charge for Idaho A late payment charge of $1 \%$ may be charged on the delinquent balance per month.


BILLING dATE: Mar 29, 2023 ACCOUNT NUMBER: 75048095-001 3 DUE DATE: Apr 25, $\mathbf{2 0 2 3}$ AMOUNT DUE: $\$ \mathbf{9 2 5 . 2 0}$
continue processing your payment as a check transaction, please call 1-800-895-0561. If you have opted out previously, please disregard this message.

## New Mailing Address or Phone?

Please print your new information below and check the box on
the reverse side of this Payment Stub. Thank you.
ACCOUNT NUMBER: 75048095-001 3

| LAST |  | FIRST | M.I. |
| :---: | :---: | :---: | :---: |
| NEW STREET ADDRESS |  |  |  |
| CITY |  |  |  |
| ST | ZIP | NUMBE |  |

[^3]EXHIBIT 2

| Date | Billing Transaction | Payment | Adjustment | New Charges | End Balance |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 04/26/22 | Beginning Balance |  |  |  | \$ | 99.37 |
| 4/27/2022 | Regular Bill |  |  | \$ 235.32 | \$ | 334.69 |
| 5/18/2022 | Payment | \$ 200.00 |  |  | \$ | 134.69 |
| 5/26/2022 | Regular Bill |  |  | \$ 130.44 | \$ | 265.13 |
| 6/2/2022 | Payment | \$ 200.00 |  |  | \$ | 65.13 |
| 6/27/2022 | Regular Bill |  |  | \$ 122.76 | \$ | 187.89 |
| 7/11/2022 | Payment | \$ 187.89 |  |  | \$ | - |
| 7/28/2022 | Regular Bill |  |  | \$ 213.31 | \$ | 213.31 |
| 8/2/2022 | Payment | \$ 213.31 |  |  | \$ | - |
| 8/29/2022 | Regular Bill |  |  | \$ 149.61 | \$ | 149.61 |
| 9/12/2022 | Payment | \$ 150.00 |  |  | \$ | (0.39) |
| 9/28/2022 | Regular Bill |  |  | \$ 159.55 | \$ | 159.16 |
| 10/5/2022 | Payment | \$ 215.00 |  |  | \$ | (55.84) |
| 10/27/2022 | Regular Bill |  |  | \$ 209.09 | \$ | 153.25 |
| 11/8/2022 | Payment | \$ 639.25 |  |  | \$ | (486.00) |
| 11/30/2022 | Regular Bill |  |  | \$ 507.18 | \$ | 21.18 |
| 12/2/2022 | Payment | \$ 150.00 |  |  | \$ | (128.82) |
| 12/30/2022 | Regular Bill |  |  | \$ 494.35 | \$ | 365.53 |
| 1/3/2023 | Payment | \$ 150.00 |  |  | \$ | 215.53 |
| 1/30/2023 | Regular Bill - January 2023 |  | \$ 68.43 |  | \$ | (972.49) |
| 1/30/2023 | Removed January 2023 |  | \$ (68.43) |  | \$ | $(1,040.92)$ |
| 1/30/2023 | Corrected January 2023 |  | \$ 435.31 |  | \$ | 648.59 |
| 2/28/2023 | Regular Bill - February 2023 |  | \$ 505.54 |  | \$ | 1,154.13 |
| 3/3/2023 | Payment | \$ 150.00 |  |  | \$ | 1,004.13 |
| 3/15/2023 | Good Will Payment | \$ 450.00 |  |  | \$ | 554.13 |
| 3/29/2023 | Regular Bill - March 2023 |  |  | \$ 371.07 | \$ | 925.20 |
| 4/5/2023 | Payment | \$ 125.00 |  |  | \$ | 800.20 |
| 4/27/2023 | Regular Bill - April 2023 |  |  | \$ 275.53 | \$ | 1,075.73 |
| 4/28/2023 | Payment | \$ 150.00 |  |  | \$ | 925.73 |


| Net Credit Calculation |  |  |  |  |
| ---: | ---: | ---: | ---: | ---: |
| $1 / 30 / 2023$ | Removed Dec 2022 Crossed Meter | -494.35 |  | -278.82 |
| $1 / 30 / 2023$ | Removed Nov 2022 | -507.18 |  | -786 |
| $1 / 30 / 2023$ | Removed Oct 2022 | -209.09 |  | -995.09 |
| $1 / 30 / 2023$ | Removed Sept 2022 | -159.55 |  | -1154.64 |
| $1 / 30 / 2023$ | Removed Aug 2022 | -149.61 |  | -1304.25 |
| $1 / 30 / 2023$ | Removed July 2022 | -213.31 |  | -1517.56 |
| $1 / 30 / 2023$ | Removed June 2022 | -122.11 |  | -1639.67 |
| $1 / 30 / 2023$ | Removed June 2022 Late fee | -0.65 |  | -1640.32 |
| $1 / 30 / 2023$ | Removed late fee | -1.35 |  | -1641.67 |
| $1 / 30 / 2023$ | Billed closing charge | 4.43 |  | -1637.24 |
| $1 / 30 / 2023$ | Corrected June 2022 | 73.98 |  | -1563.26 |
| $1 / 30 / 2023$ | Corrected July 2022 | 122.8 |  | -1440.46 |
| $1 / 30 / 2023$ | Corrected August 2022 | 106.73 |  | -1333.73 |
| $1 / 30 / 2023$ | Corrected Sept 2022 | 78.82 |  | -1254.91 |
| $1 / 30 / 2023$ | Corrected Oct 2022 | 67.76 |  | -1187.15 |
| $1 / 30 / 2023$ | Corrected Nov 2022 | 74.86 |  | -1112.29 |
| $1 / 30 / 2023$ | Corrected Dec 2022 | 71.37 |  | -1040.92 |

Net Credit
-1256.45

| Net Credit Reversal Calculation |  |  |  |  |
| ---: | :--- | ---: | ---: | ---: |
| $2 / 28 / 2023$ | Removed Dec 2022 | -71.37 |  | -1112.29 |
| $2 / 28 / 2023$ | Removed Nov 2022 | -74.86 |  | -1187.15 |
| $2 / 28 / 2023$ | Removed Oct 2022 | -67.76 |  | -1254.91 |
| $2 / 28 / 2023$ | Removed Sept 2022 | -78.82 |  | -1333.73 |
| $2 / 28 / 2023$ | Removed August 2022 | -106.73 |  | -1440.46 |
| $2 / 28 / 2023$ | Removed July 2022 | -122.8 |  | -1563.26 |
| $2 / 28 / 2023$ | Removed June 2022 | -73.98 |  | -1637.24 |
| $2 / 28 / 2023$ | Corrected June 2022 | 117.43 |  | -1519.81 |
| $2 / 28 / 2023$ | Corrected July 2022 | 213.31 |  | -1306.5 |
| $2 / 28 / 2023$ | Corrected August 2022 | 149.61 |  | -1156.89 |
| $2 / 28 / 2023$ | Corrected September 2022 | 159.55 |  | -997.34 |
| $2 / 28 / 2023$ | Corrected October 2022 | 209.09 |  | -788.25 |
| $2 / 28 / 2023$ | Corrected November 2022 | 507.18 |  | -281.07 |
| $2 / 28 / 2023$ | Corrected December 2022 | 494.35 |  | 213.28 |
| Net Credit Reversal |  |  |  |  |

## Billing Analysis

4/28/2023
Payment $\quad-150$

|  | 925.73 | 925.73 |
| :--- | ---: | ---: |
| $\mathbf{2 7 5 . 5 3}$ | 1075.73 | 1075.73 |
| $\mathbf{3 7 1 . 0 7}$ | 925.2 | 925.2 |
|  | 704.13 | 704.13 |
| Meter \#: | 342852591 |  |
| Account \#: | 750480950013 |  |


| Read Date | Source * | Days | Meter Read | Usage | Invoice <br> Amount |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 02/27/23 | E | 31 | 30775 | 4733 | \$505.54 |
| 01/27/23 | J | 30 | 26042 | 4086 | \$435.31 |
| 12/28/22 | J | 30 | 21956 | 4630 | \$494.35 |
| 11/28/22 | J | 34 | 17326 | 4576 | \$507.18 |
| 10/25/22 | J | 29 | 12750 | 1637 | \$209.09 |
| 09/26/22 | J | 32 | 11113 | 1262 | \$159.55 |
| 08/25/22 | J | 29 | 9851 | 1186 | \$149.61 |
| 07/27/22 | J | 33 | 8665 | 1673 | \$213.31 |
| 06/24/22 | J | 29 | 6992 | 976 | \$117.43 |
| 05/26/22 | M | 0 | 6016 |  |  |
| 05/26/22 | S | 1 | 6016 | 45 | \$4.43 |
| 05/25/22 | E | 29 | 5971 | 1315 | \$129.09 |
| 04/26/22 | E | 29 | 4656 | 2324 | \$234.33 |
| 03/28/22 | I | 31 | 2332 | 3452 | \$352.01 |
| 02/25/22 | I | 28 | 11629 | 4164 | \$426.28 |
| 01/28/22 | I | 30 | 7465 | 4316 | \$442.36 |
| 12/29/21 | I | 33 | 3149 | 3829 | \$392.45 |
| 11/26/21 | I | 32 | 302230 | 2160 | \$225.41 |
| 10/25/21 | I | 28 | 300070 | 1682 | \$221.12 |
| 09/27/21 | I | 32 | 298388 | 1147 | \$145.47 |
| 08/26/21 | I | 30 | 297241 | 1323 | \$171.21 |
| 07/27/21 | R | 32 | 295918 | 1490 | \$195.66 |
| 06/25/21 | I | 30 | 294428 | 1019 | \$127.13 |
| 05/26/21 | I | 30 | 293409 | 1335 | \$169.29 |
| 04/26/21 | I | 31 | 292074 | 2522 | \$260.04 |
| 03/26/21 | I | 29 | 289552 | 3186 | \$335.09 |
| 02/25/21 | I | 29 | 286366 | 3612 | \$383.20 |
| 01/27/21 | I | 30 | 282754 | 4481 | \$481.41 |
| 12/28/20 | I | 34 | 278273 | 4767 | \$513.72 |
| 11/24/20 | 1 | 32 | 273506 | 3532 | \$406.21 |
| 10/23/20 | I | 29 | 269974 | 1346 | \$177.61 |
| 09/24/20 | 1 | 30 | 268628 | 1058 | \$134.81 |
| 08/25/20 | I | 29 | 267570 | 1222 | \$159.19 |
| 07/27/20 | 1 | 33 | 266348 | 1384 | \$183.24 |
| 06/24/20 | I | 29 | 264964 | 1011 | \$127.38 |
| 05/26/20 | I | 32 | 263953 | 1102 | \$130.57 |
| 04/24/20 | I | 29 | 262851 | 1844 | \$178.58 |
| 03/26/20 | I | 28 | 261007 | 2169 | \$214.44 |
| 02/27/20 | 1 | 28 | 258838 | 3181 | \$326.13 |
| 01/30/20 | I | 31 | 255657 | 3129 | \$320.39 |


| Read Date | Source $*$ | Days | Meter Read | Usage | Invoice <br> Amount |
| ---: | :---: | :---: | ---: | ---: | ---: |
| $12 / 30 / 19$ | I | 35 | 252528 | 3777 | $\$ 391.91$ |
| $11 / 25 / 19$ | I | 32 | 248751 | 3007 | $\$ 330.90$ |
| $10 / 24 / 19$ | I | 29 | 245744 | 2084 | $\$ 281.76$ |
| $09 / 25 / 19$ | I | 30 | 243660 | 803 | $\$ 94.83$ |
| $08 / 26 / 19$ | I | 31 | 242857 | 1001 | $\$ 123.71$ |
| $07 / 26 / 19$ | I | 31 | 241856 | 690 | $\$ 78.73$ |
| $06 / 25 / 19$ | I | 32 | 241166 | 1073 | $\$ 134.26$ |
| $05 / 24 / 19$ | I | 29 | 240093 | 1457 | $\$ 181.15$ |
| $04 / 25 / 19$ | I | 29 | 238636 | 1709 | $\$ 163.95$ |
| $03 / 27 / 19$ | I | 28 | 236927 | 2962 | $\$ 302.51$ |
| $02 / 27 / 19$ | I | 29 | 233965 | 3634 | $\$ 378.55$ |
| $01 / 29 / 19$ | I | 32 | 230331 | 4207 | $\$ 442.19$ |
| $12 / 28 / 18$ | I | 31 | 226124 | 3814 |  |
| $11 / 27 / 18$ | I | 34 | 222310 | 3270 |  |
| $10 / 24 / 18$ | I | 29 | 219040 | 1733 |  |
| $09 / 25 / 18$ | I | 31 | 217307 | 976 |  |
| $08 / 24 / 18$ | I | 32 | 216331 | 942 |  |
| $07 / 26 / 18$ | I | 29 | 215389 | 935 |  |
| $06 / 25 / 18$ | I | 31 | 214454 | 747 |  |
| $05 / 24 / 18$ | I | 32 | 213707 | 988 |  |
| $04 / 25 / 18$ | I | 29 | 212719 | 1747 |  |
| $03 / 27 / 18$ | I | 29 | 210972 | 2848 |  |
| $02 / 26 / 18$ | I | 29 | 208124 | 3862 |  |

$\mathrm{A}=$ Adjustment, $\mathrm{C}=$ Customer, $\mathrm{E}=$ Remote Read, $\mathrm{F}=$ Field Read, $\mathrm{I}=$ Itron Read (regular), $\mathrm{M}=$ Manual (regular), $\mathrm{O}=$ Office Estimate, $\mathrm{P}=$ Postcard, $\mathrm{S}=$ System Estimate, $\mathrm{J}=$ Out of


[^0]:    ${ }^{1}$ It is important to note that the Company subsequently rectified this error by conducting a subsequent breaker test. The breaker test confirmed the accurate association of Ms. Cole's meter with her own account, thereby resolving any doubts or confusion. The Company took prompt action to correct the issue and ensure that Ms. Cole's billing and meter were properly aligned.

[^1]:    ${ }^{2}$ The Company acknowledges that the adjustment made on January 25, 2023 should have been for six months as required by Electric Service Regulation No. 7(a). However, the Company believes that the customer was not harmed by this additional month since the Company has since reversed this charge.

[^2]:    ${ }^{3}$ Supra footnote 2.

[^3]:    This product contains
    fiber from well-managed, independently certified forests.

