

Public Utility Commission of Oregon  
550 Capitol St NE #215  
PO Box 2148  
Salem OR 97308-2148

Re: UM 1415

Please find the joint opening comments of Community Action Partnership of Oregon and Oregon HEAT in UM 1415, INVESTIGATION INTO COST METHODS FOR USE IN DEVELOPING ELECTRIC RATE SPREADS attached.

Sincerely,

Jess Kincaid  
Oregon Energy Partnership Coordinator  
Community Action Partnership of Oregon  
P.O. Box 7964  
Salem, OR 97301

[jess@caporegon.org](mailto:jess@caporegon.org)

UM 1415 Joint Opening Comments of CAPO and Oregon HEAT

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1415

In the Matter of  
INVESTIGATION INTO COST METHODS FOR  
USE IN DEVELOPING ELECTRIC RATE  
SPREADS

OPENING COMMENTS

Community Action Partnership of Oregon and Oregon HEAT believe that mandatory time of use rates could unfairly burden elderly or disabled Oregonians, or populations with complex and busy lives. The frequently varying prices can be difficult to track and budget for, and would force vulnerable populations to put their health at risk by further curtailing their use of heat or cooling during times of extreme heat or cold.

Social service providers at Community Action Agencies have regular visits with elderly women who shiver under a blanket in one room of their home during the winter. They also visit families with young children who live in mobile homes where the indoor temperature reaches 100 degrees during the summer because they simply cannot afford to turn on a window air conditioner. Adding complexity of regularly changing rates and unpredictable bills could be unfair and unsafe for them.

Time of use rates would be unfair to those who heat with electricity. Many of Oregon's poorest residents live in apartments and mobile homes where electricity is their only source of heat. The implementation of such a rate structure would force them to decide between lowering the heat in their homes to unsafe levels, and incurring utility costs that they cannot afford to pay.

UM 1415 Joint Opening Comments of CAPO and Oregon HEAT

It is not uncommon for the indoor temperature in a mobile home to dramatically exceed the outdoor temperature on hot days, even with all the windows and doors open. Time of use rates could unfairly burden the more than 130,000 households who live in mobile homes in Oregon, especially in the eastern portion of the state. It is simply not safe for an elderly individual in a mobile home to turn off their air conditioning in order to save money. Their home will turn into a virtual solar oven as the internal temperature soars.

Time of use rates could unfairly burden renters. People who rent their home typically have little control over the efficiency of the appliances that come with it. Often apartments are poorly insulated and have refrigerators and heating equipment that is outdated and inefficient. While there are programs to upgrade the efficiency of such residences, there is often no incentive to the landlord to invest in the upgrade the efficiency of low-cost apartments. Most choose not to.

Low-Income Oregonians typically can't afford to upgrade the efficiency of their homes or mobile homes. Weatherization assistance programs lack the funding to cover the costs of these upgrades for everyone eligible. While the funding for programs that provide these upgrades for free has increased during recent years, we are still only able to serve approximately 5,000 of the hundreds of thousands of eligible households in Oregon every year.

The Oregon Legislature has consistently recognized the importance of protecting low-income citizens from utility shut off. During the 2011 session they passed Senate Bill 863, which recognizes the growing need for energy assistance payments and allows for increased assistance collections when the need exceeds a certain threshold. This bill

UM 1415 Joint Opening Comments of CAPO and Oregon HEAT

was a response to an already unmet need; implementing mandatory time of use rates would only increase the demand for assistance payments further.

People on a limited income need to be able to budget for their bills if they are to pay them. Oregonians living below fifty percent of the Federal poverty level already pay an average of more than 44 percent of their income to cover utility bills. Time of use rates will make budgeting payments difficult for many and could force low-income families that are currently able to cover their costs to make the choice between paying utility bills and purchasing food or medications.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the foregoing **OPENING COMMENTS** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC

Docket No. Um 1415

Dated: 9/ 8/11

---

Signed

Jess Kincaid  
Oregon Energy Partnership Coordinator  
Community Action Partnership of Oregon  
P.O. Box 7964  
Salem, OR 97301

[jess@caporegon.org](mailto:jess@caporegon.org)

**W=Waive Paper  
service****C=Confidential  
HC=Highly Confidential**[Sort by Last Name](#)[Sort by Company Name](#)**W****BOEHM KURTZ & LOWRY**KURT J BOEHM (C)  
ATTORNEY36 E SEVENTH ST - STE 1510  
CINCINNATI OH 45202  
kboehm@bkllawfirm.com

MICHAEL L KURTZ (C)

36 E 7TH ST STE 1510  
CINCINNATI OH 45202-4454  
mkurtz@bkllawfirm.com**W****BRUBAKER AND ASSOCIATES**

ALAN ROSENBERG (C)

16690 SWINGLEY RIDGE RD - STE 140  
CHESTERFIELD MO 63017  
arosenberg@consultbai.com**CITIZENS' UTILITY BOARD OF  
OREGON**

OPUC DOCKETS

610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
dockets@oregoncub.org

G. CATRIONA MCCrackEN (C)

610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
catriona@oregoncub.org**W****COMMUNITY ACTION PARTNERSHIP  
OF OREGON**

JESS KINCAID

PO BOX 7964  
SALEM OR 97301  
jess@caporegon.org**W****CONSUMER AFFAIRS CONSULTANT**

BARBARA R ALEXANDER (C)

83 WEDGEWOOD DR  
WINTHROP ME 04364  
barbalex@ctel.net**W****DAVISON VAN CLEVE PC**

S BRADLEY VAN CLEVE (C)

333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
mail@dvclaw.com; bvc@dvclaw.com**W****ECOTALITY, INC**

ALANA CHAVEZ-LANGDON

4 EMBARCADERO CENTER SUITE 3720  
SAN FRANCISCO CA 94111  
achavez@ecotality.com**W****FRED MEYER STORES/KROGER**

NONA SOLTERO

3800 SE 22ND AVE  
PORTLAND OR 97202  
nona.soltero@fredmeyer.com**W****IDAHO POWER COMPANY**

CHRISTA BEARRY

PO BOX 70  
BOISE ID 83707-0070  
cbearry@idahopower.com

REX BLACKBURN

PO BOX 70  
BOISE ID 83707-0070  
rblackburn@idahopower.com

JEANNETTE C BOWMAN

PO BOX 70  
BOISE ID 83707  
jbowman@idahopower.com

TIM TATUM (C)

PO BOX 70  
BOISE ID 83707-0070  
ttatum@idahopower.com

MICHAEL YOUNGBLOOD

PO BOX 70

-----

BOISE ID 83707  
myoungblood@idahopower.com

**W MCDOWELL RACKNER & GIBSON PC**

WENDY MCINDOO (C) 419 SW 11TH AVE., SUITE 400  
PORTLAND OR 97205  
wendy@mcd-law.com

LISA F RACKNER (C) 419 SW 11TH AVE., SUITE 400  
PORTLAND OR 97205  
lisa@mcd-law.com

**W PACIFIC POWER**

MARY WIENCKE 825 NE MULTNOMAH ST, STE 1800  
PORTLAND OR 97232-2149  
mary.wiencke@pacificorp.com

**W PACIFICORP, DBA PACIFIC POWER**

OREGON DOCKETS 825 NE MULTNOMAH ST, STE 2000  
PORTLAND OR 97232  
oregondockets@pacificorp.com

**W PORTLAND GENERAL ELECTRIC**

DOUG KUNS RATES & REGULATORY 121 SW SALMON ST 1WTC0702  
AFFAIRS PORTLAND OR 97204  
pge.opuc.filings@pgn.com

DOUGLAS C TINGEY (C) 121 SW SALMON 1WTC13  
PORTLAND OR 97204  
doug.tingey@pgn.com

**W PUBLIC UTILITY COMMISSION OF OREGON**

GEORGE COMPTON (C) PO BOX 2148  
SALEM OR 97308-2148  
george.compton@state.or.us

**W PUC STAFF--DEPARTMENT OF JUSTICE**

JASON W JONES (C) BUSINESS ACTIVITIES SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
jason.w.jones@state.or.us

**W SMART GRID OREGON/ECOTALITY COUNSEL**

BARRY T WOODS 5608 GRAND OAKS DR  
LAKE OSWEGO OR 97035  
woods@sustainableattorney.com