



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

October 4, 2019

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 1631 PGE's Application of a Partial Waiver of OAR 860-021-0405(11)

Pursuant to Oregon Administrative Rule (OAR) 860-021-0005, Portland General Electric Company (PGE) hereby submits a partial waiver request of OAR 860-021-0405(11), Notice of Pending Disconnection of Residential Electric or Gas Utility Service. PGE's Customer Care Team met with Phil Boyle on October 3, 2019 to discuss the waiver request and planned customer outreach, should the waiver be granted. Mr. Boyle provided feedback and expressed support for the waiver. PGE requests that this matter be placed on the October 22, 2019 public meeting agenda, so that PGE may timely execute its customer outreach and notification plan before the new year.

Should you have any questions or comments regarding this filing, please contact Mary Widman at (503) 464-8223. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

for 
Karla Wenzel
Manager, Policy & Strategy

Enclosure
cc: Phil Boyle

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1631

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Application for Waiver of OAR 860-021-
0405(11), Notice of Pending Disconnection of
Residential Electric or Gas Utility Service

**APPLICATION OF PORTLAND
GENERAL ELECTRIC COMPANY
FOR PARTIAL WAIVER OF OAR 860-
021-0405(11)**

Pursuant to OAR 860-021-0005, Portland General Electric Company (PGE or Company) hereby submits to the Commission requesting a partial waiver request of OAR 860-021-0405(11), Notice of Pending Disconnection of Residential Electric or Gas Utility Service, for two years or until the Commission updates its Division 21 administrative rules. This request affects only customers without remote connect meters, and will enable PGE to cease field collections from customers of overdue billed amounts, prior to disconnecting service. If this waiver is granted, PGE would continue to knock on the door of the customer to advise that the service is being disconnected.

OAR 860-021-0405 requires that:

(9) The energy utility must make a good-faith effort to personally contact the customer or an adult at the residence to be disconnected on the day the energy utility expects to disconnect service or, where the service address has remote disconnection capability installed, at least three business days prior to the day the energy utility expects to disconnect service:

(a) If contact is made, either in person or via the telephone, the energy utility must advise the customer or an adult at the residence of the proposed disconnection; or

(b) If contact is not made, the energy utility must:

(A) Leave a notice in a conspicuous place at the residence informing the customer that service has been, or is about to be, disconnected; or

(B) Attempt to contact the customer at a service address where remote disconnect capability is installed via the telephone at least twice a day for the three consecutive days prior to the proposed disconnection, and at least one call must be placed during the

morning or afternoon (8:00 am to 5:00 pm) and another call placed during early evening (6:00 pm to 8:00 pm). Where an answering machine or service is available, the utility must leave a message at the end of each calling day informing the customer of the proposed disconnection. Initial implementation of section (9)(b)(B) may not occur during the winter heating season (November 1 through April 30).

* * *

(11) When the energy utility makes personal contact under this rule, *the utility's representative making contact is empowered to accept reasonable partial payment of the overdue balance under the time-payment provisions of OAR 860-021-0415.* (Emphasis added).

Discussion

Generally, OAR 860-021-0405(9) requires an attempt to make personal contact with the customer to be disconnected on the day of disconnection when the customer does not have a remote connect meter and subsection (11) requires the PGE employee performing the disconnection to accept partial payment of the overdue balance, while onsite for disconnection of service. PGE is making its request for a waiver of the requirement to accept payment on the doorstep, based on concerns for employee safety.

Safety is the top priority for PGE and we take seriously our responsibility to provide employees with a safe and healthy workplace. PGE closely monitors both physical and verbal threats made to the Company to help ensure employees are not visiting locations unaware of the potential danger. One way the Company can reduce potential harm to its employees is to seek a waiver of the requirement for employees to accept payment on the date of disconnection and carrying customer payments when customers pay in lieu of disconnection.

Field employees, especially those who work solo, who are known to carry money in their vehicles are inherently at risk for being attacked and/or robbed as they travel their daily route. Removing the requirement to accept payment from the Customer will significantly reduce the possibility that these field collectors will be targets of violence. The Company's intention to stop

collecting payment at the door during a disconnection will not remove all risk, but it is a proactive approach toward minimizing the risk and providing a safer workplace.

The following table shows the last three years of reported threat totals made to company employees:

Threat Summary from 2017 to current¹.

| Year | Physical Threats | Verbal Threats | Harm to Self/Other | Reported Totals |
|------|------------------|----------------|--------------------|-----------------|
| 2017 | 8 | 9 | 7 | 24 |
| 2018 | 4 | 19 | 9 | 32 |
| 2019 | 6 | 26 | 22 | 54 |

Granting the Waiver will not Harm Customers because they receive Multiple Notices Prior to Disconnection and have Multiple Ways to Pay

Disconnecting electricity for non-payment is a utility company’s last resort. Prior to disconnection, PGE provides customers with multiple notifications of their overdue account balances, and potential disconnection of service. Specifically, the Company provides the following before disconnecting service: monthly billing amount and due date; automated calls; past due notice clearly indicating the account is past due, showing the amount due and both a “must be paid by” and “due by date” (same date); urgent notice indicating the amount due and both a “must be paid by” date and “due by” date (same date). This billing and collection process provides customers with multiple notifications using various communication methods prior to the disconnection, giving ample time to arrange for a payment to be made prior to disconnection. Prior to the field disconnection, the PGE employee will still knock on the customer’s door to attempt personal contact with the customer to make them aware of the disconnection prior to it happening.

¹ See OSHA’s website at www.osha.gov for informational fact sheets highlighting OSHA programs, policies, or standards. It does not impose any new compliance requirements or carry the force of legal opinion. For compliance requirements of OSHA standards or regulations, refer to Title 29 of the Code of Federal Regulations.

In addition to multiple ways to pay their bills, PGE also offers numerous payment methods including: automatic payments through the customer's bank; online through portlandgeneral.com available 24 hours a day, seven days a week; U.S. Mail with the cost of a stamp plus the cost of a check or money order; by telephone either through an automated system or with an employee; payment in person such as at Western Union® CheckFreePay convenient locations and PGE Community Offices.

When a customer waits to pay until a field representative is at their door, they are using the most expensive payment option as they incur a \$20.00 field collection fee. The company offers numerous no-cost or low-cost payment methods for increased customer convenience, including debit and credit cards. Online and pay by phone payment options allow customers to make payment from their own residences, any internet connection, or through their mobile phones.

PGE respectfully seeks waiver of the specific provisions of OAR 860-021-0405(11). The waiver would decrease the safety risk to employees without sacrificing customer service. Further, customers harm is minimized. Customers receive a variety of notices of balances owed and pending disconnection notices. Customers may pay bills through various no-or low-cost payment methods. Finally, eliminating the ability to pay at the door removes the most expensive payment option and keeps employees safe.

Customer Outreach and Communication

Upon receiving OPUC approval, PGE will notify customers. Field Collection Representatives will be handing out a postcard to the customers they visit. The postcard outlines the process change and provides other payment options. The postcard has been shared with the OPUC's Consumer Staff and is attached as Exhibit A. PGE is planning a second

communication, a letter, to all customers who have made a payment in the field in the last 24 months. The letter will explain the process change and again, provide other payment options. Lastly, PGE will communicate a third time with a written notice included in all 5-day disconnection notices. It, too, will explain the process change of no longer accepting payments in the field.

Conclusion

OAR 860-021-0005 allows the Commission to grant waivers of Division 21 rules for good cause shown. PGE respectfully seeks a waiver of the specific provisions of OAR 860-021-0405(11) requiring the utility to collect payment on the date of disconnection of service from customers during the site contact. Good cause exists to grant the Company's request for waiver. Such a waiver would allow PGE the ability to increase the safety of employees without sacrificing customer service. PGE's planned outreach to inform customers will raise customer awareness of this change and provide customers with alternatives.

Communications

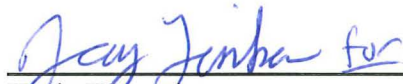
Communications regarding this application should be addressed to:

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For all the reasons described above, the Company requests that Commission approve the request for waiver effective for two years beginning from Commission approval or until the Commission updates the Division 21 Rules from the requirements of OAR 860-021-0405 (11) as described herein.

DATED this 4th day of October, 2019.



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Exhibit A

Upcoming changes to payment options



Beginning December 1, 2019, we will no longer be able to take payments while we are at your location. You still have several options for how you can pay your bill, including by phone, online, or at an authorized payment location like Western Union.

Ways to pay

Online

Online payments are easy. Simply enter your checking account, debit or credit card information on our secure website at portlandgeneral.com to pay online. You can also sign up for reminder alerts, or set up Auto Pay for worry-free payments each month.

By Phone

Make payments with your checking account, debit or credit card over the phone using our automated system, available 24/7, at 800-542-8818.

In Person

Visit an authorized payment location to pay your bill using cash or a personal credit card for a flat service fee of up to \$1.50. Western Union or CheckFreePay have convenient locations in many Fred Meyer, Safeway, Rite Aid and select Walmart stores.

Need help paying your bill?

You may qualify for other PGE payment options or bill payment assistance. We'll help you find a solution that works for you. Call our Customer Service team Monday–Friday from 7 a.m. to 7 p.m. at **503-228-6322** or **800-542-8818** to discuss your options.

portlandgeneral.com