



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

March 13, 2020

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 Waiver of OAR 860-021-0126,
Schedule 300, and Rule F**

Pursuant to Oregon Administrative Rule (OAR) 860-021-0005, Portland General Electric Company (PGE) hereby submits for expedited consideration a waiver request of Oregon Administrative Rule (OAR) 860-021-0126 Late Payment Charge, the late payment fee of 2.1% monthly in Schedule 300, and Rule F Section J effective immediately.

As an essential service provider PGE feels a responsibility to deliver safe and reliable service to our customers. Times like these our customers need us more than ever and we are here to help.

PGE requests this waiver for the next thirty days of the requirements of OAR 860-021-0126. PGE requests this waiver due to the ongoing public health emergency in Oregon caused by COVID-19. Oregon's governor declared a state of emergency on Sunday March 8, 2020. Due to this unforeseen pandemic, PGE will not be charging late payment charges due to this public health emergency.

In response to the rapidly changing economic conditions facing customers, PGE is also ceasing disconnection of all utility customers for nonpayment during this public health emergency for the next thirty days.

Should you have any questions or comments regarding this filing, please contact me at (503) 464-8954 or Chris Pleasant at (503) 464-2555. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1631

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Application for Waivers of Tariff Schedule 300
Late Payment Charge, Rule F Section J, and
OAR 860-021-0126 Late Payment Charge

**APPLICATION OF PORTLAND
GENERAL ELECTRIC COMPANY
(EXPEDITED CONSIDERATION
REQUESTED)**

Pursuant to OAR 860-021-0005, Portland General Electric Company (PGE) hereby submits to the Commission this request for a waiver of the requirements of OAR 860-021-0126, the late payment fee of 2.1% monthly in Schedule 300, and PGE Rule F Section J to be effective immediately. OAR 860-021-0126 discusses late payment charges which PGE tariffs are consistent with that rule,

OAR 860-021-0126 requires that:

Late-Payment Charge

- (1) Except as provided in section (2) of this rule, an energy or large telecommunications utility may apply a late-payment charge to customer accounts not paid in full each month, provided the utility has filed the late-payment charge in its rate schedule.
- (2) An energy utility shall not impose late-payment charges on residential customers unless:
 - (a) The energy utility offers residential customers a preferred billing date option under which the customer can select or change a bill date. Utilities shall not be required to change a customer's bill date more than once in any 12-month period;
 - (b) The energy utility's rate schedule provides that the late charge is not applied on residential balances less than \$200; or
 - (c) The charge is applied only to amounts carried forward for two consecutive months.
- (3) The charge will be based on a monthly late-payment rate applied to overdue account balances at the time of preparing the subsequent month's bill for residential accounts or by the bill due date for all other accounts. The late payment charge may not be applied to time-payment or equal-payment accounts that are current. The Commission will determine the late-payment rate based on a survey of prevailing market rates for late-payment charges of commercial enterprises and will advise all utilities of the changes in the rate they may use to determine late-payment charges on overdue customer accounts as needed. The current late-payment rate and the conditions for its application to customer accounts shall be specified on the energy or large telecommunications utility bill.

PGE requests this waiver to due to the ongoing public health emergency in Oregon caused by COVID-19. Oregon's governor declared a state of emergency on Sunday March 8, 2020 due to this unforeseen pandemic.

Discussion

Beginning upon Commission approval PGE will suspend under OAR 860-021-0126 and PGE Schedule 300 Billing Rates, Late Payment Charge (monthly) of 2.1% related to delinquent balances. PGE assess late payment charges under Rule F, section J, which states, "A late Payment Charge may be assessed to any account that is not paid in full each month. For Residential Customers, the Late payment Charge will be computed as specified in Schedule 300 and applied to the delinquent balance no earlier than at the time of preparing the subsequent month's bill. A Nonresidential Customer may be assessed a late payment charge against any account that is not paid in full each month. A late Payment charge will not be applied to a Residential account with a Time Payment Agreement or a Budget Pay Plan that is current."

Request

For the reasons stated above, PGE respectfully seeks a waiver for the next thirty days of the requirements of OAR 860-021-0126, the late payment fee of 2.1% monthly in Schedule 300, and PGE Rule F Section J, effective immediately. PGE requests this waiver due to the ongoing public health emergency in Oregon caused by COVID-19. Oregon's governor declared a state of emergency on Sunday March 8, 2020. As an essential service provider PGE feels a responsibility to deliver safe and reliable service to our customers during this uncertain time. PGE is looking at measures it can take to assist its customers. Due to this unforeseen pandemic, PGE will not be charging late payment charges due to this public health emergency. PGE will reassess the situation and may seek to extend this waiver.

Communications

Communications regarding this application should be addressed to:

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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 860-021-0126, the late payment fee of 2.1% monthly in Schedule 300, and PGE Rule F Section J effective immediately. PGE requests this waiver due to the ongoing public health emergency in Oregon caused by COVID-19. Oregon's governor declared a state of emergency on Sunday March 8, 2020, due to this unforeseen pandemic.

Good cause exists to grant the Company's request for the waiver. Such a waiver would allow PGE to continue providing electricity service to utility customers during this state of emergency.

For all the reasons described above, the Company requests that Commission approve this request for a waiver effective for the next thirty days.

DATED this 13th day of March 2020.

\s\ Robert Macfarlane

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