



THE COMMUNITY ACTION PARTNERSHIP OF OREGON

IN RE: AR 601 SEVER WEATHER MORATORIUM

Utility Commission of Oregon Filing Center
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The Community Action Partnership of Oregon (CAPO) appreciates the dedication from staff on this matter. Promulgating a moratorium into rule is long overdue, as Oregon is in the minority of states without proper disconnection rules during severe weather. The new rule addresses this issue.

CAPO fully supports staff's draft rule. Additionally, we agree with CUB that the rule should not be modified to comply with Northwest Natural's response under section (3).

The moratorium should remain in effect for no less than 24 hours

We would also like to remind the Oregon Public Utilities Commission, and all parties to the docket, that by allowing a "Winter Protection Program," low-income and vulnerable ratepayers will be reliant on the utilities ability to communicate that offering during service connection and before the heating season begins. No program will be successful without willing participation from the utility offering the program. We urge the commission to address this matter if participation is lagging. We urge a public review into low-income disconnections and "Program" participation rates each year.

Again, CAPO thanks the OPUC for taking on this matter and addressing the concerns of all parties before drafting this rule.

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