



11/22/16

Citizens' Utility Board (CUB) of Oregon  
610 SW Broadway, Suite 400  
Portland, OR 97211

**RE: AR 601 Severe Weather Moratorium on Involuntary Disconnection**

In general, CUB agrees with the proposed rules, especially sections one through five. The comments below, however, concern the final section six.

To CUB's knowledge Idaho, Power is the only energy utility with a voluntary program already in place. So were the proposed rules to go into effect today, section six would only apply to Idaho Power.

It is important to note that Idaho Power has two cold weather programs that work in concert – the voluntary moratorium piece that prevents shutoffs between December and February, and the “Winter Payment Plan” (WPP) component that allows customers to make payments equal to one half of the “Budget Pay Plan” between November and March.

CUB does not inherently object to a participatory approach in much colder climates such as Idaho Power's Oregon service territory. However, CUB does object to any voluntary program lacking an effective, targeted outreach/marketing approach to inform customers of their billing options.

As it stands, folks who do not sign up for the WPP, but who do participate in the voluntary winter shutoff moratorium (i.e. do not pay their winter balance) must pay their winter balance by March 1 or face service disconnection.

Therefore, customers who voluntarily participate in the winter shutoff moratorium must clearly understand the billing implications. Avoiding undue shutoffs during the coldest months of the year is well-and-good, but not if these very same customers face shutoff come March (not exactly a warm month in Malheur County).

CUB wants to know more about Idaho Power's outreach/marketing approach to inform customers of the two programs and their level of interaction.

**Some questions:**

Is there coordination with the local CAP agency out of Ontario and/or other service-oriented groups? Does Idaho Power send mailers or emails? Does the utility attach information with physical or electronic billing correspondence? By when do customers need to sign up (can folks sign up at any point during the winter?)?

**Other questions and points of concern:**

Might section six open the door for the other energy utilities to create voluntary programs of their own to circumvent rules established in sections one through five? This is, perhaps, an unlikely scenario considering the unique climate of Idaho Power's limited service territory, and that it is the utility's only Oregon territory.

Might section six also open the door for energy utilities to create voluntary disconnection programs for the hotter summer months? Climate change should continue to affect Oregon – especially the Eastern regions – during the summer months.

In summary, CUB believes the rules are headed in the right direction, but that section six, in particular, would benefit from ongoing clarity through discussion.