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

**Re: AR 601 – Rulemaking Regarding Severe Weather Moratorium**

Portland General Electric (PGE) appreciates the opportunity to comment on questions posed by Staff. We provide the following comments:

- 1. Should the rule allow each utility the discretion to formulate its own plan incorporating minimum standards to be set by rule or should the Commission prescribe the severe weather moratorium standard?*

We believe each utility should be allowed to design a severe weather moratorium for disconnecting customers for non-payment that best protects customers and personnel in its service territory. We prefer that each utility formalize its current process through a tariff filing, but we could support a rule that allows flexibility. A flexible rule could prescribe trigger temperatures to initiate a moratorium, but still allow the utility to articulate how it will exercise discretion in a tariff filing to capture the specific geographical location and weather conditions of its service territory. Going the tariff route would require an advice filing, subject to Commission approval, and would avoid a formal rulemaking process.

- 2. Should there be different triggers for different geographic areas (e.g. Eastern Oregon vs Western Oregon vs Southern Oregon)?*

PGE recognizes the geographic and weather differences across the state. We understand that the Commission seeks consistency in the temperature triggers to provide a standard that is simple to administer. However, we believe that formalizing a severe weather moratorium for non-payment through a tariff filing would best address the specific service territories of different utilities. Details, including geographical locations and National Weather Service stations, could potentially be included in a tariff filing to identify locational and regional differences. We support the language proposed by Staff that publicly available temperature forecasts from an unbiased, objective, third-party such as the National Weather Service be used. Referencing forecasts at one or two National Weather Service locations within PGE's service territory would better ensure that all PGE customers are protected.

3. *What are the appropriate winter and summer temperature triggers?*

If the commission decides to promulgate a rule that lists trigger temperatures for severe weather moratorium for non-payment, the high and low temperatures should be for all of Oregon. A consistent temperature ensures that all customers in Oregon will understand when the state moratorium applies. A winter trigger of 32 degrees and a summer trigger of 100 degrees are the most appropriate temperatures to protect customers. A utility should be allowed to self-impose a moratorium if the utility believes that its service territory requires increased protection.

4. *Discussion of period of time trigger must be met before a moratorium is initiated (e.g. 24 hours, 48 hours).*

Evaluating a weather/temperature forecast and deciding to initiate a moratorium should occur on the same day. A 24 hour and 48 hour period of time trigger before a moratorium is initiated creates variability in temperature fluctuation. A same day, or day-of, decision to initiate a moratorium ensures operational efficiency within utilities and clarity for customers. PGE's current practice of using the National Weather Service to determine if we disconnect for non-payment, is consistent with a day-of process. We do not believe that the Commission should determine a universal time of day between all utilities to check a forecast or initiate a moratorium. Administering a universal time to check a forecast or initiate a severe weather moratorium for non-payment would be difficult operationally. Utilities' current processes are timely and cost efficient.

5. *How long should the moratorium remain in effect and under what conditions should it end?*

The severe weather moratorium for non-payment should last for the duration of the day in which it was implemented. Moratoriums should be re-evaluated daily at the time the utility routinely evaluates the forecast. A severe weather moratorium for non-payment should be in place until conditions change or an advisory is lifted.

6. *Are there other circumstances under which a moratorium should be put into effect?*

We do not believe there are other circumstances under which a severe weather moratorium for non-payment should be put into effect by rule. Utilities should continue to have discretion to halt disconnections for non-payment when facing conditions not related to extreme temperatures.

7. *What will it cost utilities to implement a severe weather program?*

A rule that includes specific language similar to the language posed by Staff would require procedural changes at little cost with no significant system changes for PGE. Costs would not be certain until a rule is finalized. If the moratorium is based on a tariff filing, each utility will be able to make a showing about cost impacts it has experienced if it wants to propose a change in the moratorium terms.

While the question is aimed at utility costs, it should be noted that frequent or long moratoriums create hardships on customers through increasing balances that become difficult to pay.

In closing, we reiterate our support for a flexible rule and express our thanks to Staff for leading a collaborative rulemaking. We encourage the Commission to consider the benefits of a tariff filing and more flexible approach. We look forward to the next steps in this process.

Sincerely,



Karla Wenzel

Manager, Pricing and Tariffs