Keith Kueny
Energy Policy Coordinator
The Community Action Partnership of Oregon
350 Mission SE
Salem, OR 97302

The Community Action Partnership of Oregon (CAPO) submits thereinto comments at the request of Oregon Public Utilities Commission (OPUC) staff in response to the workshop held regarding docket AR 601, severe weather moratorium. CAPO will attempt to answer the questions OPUC staff listed during the workshop:

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?**

There should be a combination of both administrative rule and tariffs for formulating the moratorium across OPUC service territory. Temperatures used to trigger a moratorium should apply to the whole state of Oregon. However, each utility has different business operations that would change the time and method a company would read forecasted temperatures. The crux of the moratorium and the general basis for protecting Oregonians, a cold and hot temperature trigger, should be a minimum administrative rule throughout the state. CAPO recognizes that a standard rule for all Oregon investor owned utilities will create non-equal utility impacts through Oregon utility territory. However, health impacts from cold are not governed by the disparate impact that utilities will face. When it gets cold, health in vulnerable populations declines, period. The reason for standardization is to create consistency and fairness through Oregon in how customers are treated during cold weather.

Utilities contend that too many days in their service territory fall below 32 Fahrenheit, therefore each utility should be able to create their own standard for a disconnection, or find a number below 32 Fahrenheit. Utilities failed to adequately provide a data that increasing the temperature to 32 Fahrenheit would hurt business operations and substantially increase arrears. Only a handful of customers, by the utilities own measures, would trigger the moratorium for loss of service by the difference between 32 and 25 degrees in cold weather months. That's because minimal homes were disconnected during January of 2015, with a slight increase in extraordinarily cold years. The financial impact would be negligible, thus the commission should error on the side of protecting consumers and provide a standard benchmark rule applying to all of Oregon.

Any rule in place should be considered minimal and if a utility would like to extend a disconnection moratorium, by date or temperature, they should be able to implement that extension through tariff.

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

No, there should not be separate triggers in differing geographic areas.

Utilities have not provided evidence that a human being suffering from cold temperature in Eastern Oregon is better prepared for cold weather in Western Oregon. Nor has any utility provide evidence that vulnerable populations' health impacts are different brought on by cold temperature. The human body, when made vulnerable by illness or old age, is susceptible to long exposure to cold temperatures. Mortality rates follow a curve and cardiovascular-deaths increase inversely to temperature. [1] Because of this relationship, OPUC should implement a consistent rule across the state.

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

32 Fahrenheit is a common temperature used by other states for temperature-based moratoriums. Most states that don't use a temperature-based moratorium have a time-based moratorium. Out of fourteen states that have a temperature-based moratorium, 11 states currently use 32 as a trigger point for initiating cold weather moratoriums, with Kansas, Iowa, and Vermont using separate metrics. Using freezing point as the triggering temperature allows for ease of understanding by customers and addresses the biggest concern: protecting Oregonians. At 32 Fahrenheit, the health in elderly begins to be severely impacted. Older adults can develop hypertension and chilblains, which are a mild cold injury caused by prolonged and repeated exposure for several hours to air temperatures from above freezing but gets considerably worse under freezing. For every drop in a single degree of Celsius below freezing, there is a 5% increase in hospital admissions.[2] Again, no utility has provided evidence that suggests vulnerable populations are better served by the lower standard. They have also failed to show a compelling case, with evidence, that business practices would be hindered.

For summer months, a summer heat advisory should trigger the moratorium. A heat advisory means that people can be affected by heat if precautions are not taken. Emergency room visits increase sharply after 95 Fahrenheit. The issuance of a heat advisory is important to raise public awareness that these precautions need to be taken, so it follows logic that utilities should refrain from disconnection. For a heat advisory warning to be issued, the Heat Index has to remain at or above 100°F for a minimum of 2 hours. Heat advisories are issued by zone when any location within that zone is expected to reach criteria. For example: If you expected the heat index to reach 100°F in the city of Portland, a heat advisory would be issued for that county.

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

CAPO prefers that the moratorium be daily, with each utility providing a methodology in checking the forecast: whether that is the night before or on the same day. The forecast should apply for one day only.

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

The moratorium should be for each day the forecasted temperature is under 32 Fahrenheit.

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

The OPUC should consider extending moratoriums, altogether, for individuals with health certificates.

---

[1] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3119517/

[2] https://www.ncbi.nlm.nih.gov/pubmed/15093986