



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204
PortlandGeneral.com

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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 602 – PGE Comments on Service Disconnection Reporting
for Energy Utilities**

Portland General Electric Company (PGE) appreciates the opportunity to provide comments following the workshop on July 12, 2017 in Docket No. AR 602. PGE valued the collaborative approach from parties in this workshop. PGE is supportive of disconnection reporting by utilities, provided the objective of such reporting is clear and the design of the rule is tailored to that objective. We thank OPUC Staff (Staff) for initiating this discussion. The objective of disconnection reporting has still yet to be articulated and PGE is optimistic that parties and Staff will define what can be accomplished by the reporting in the rule. In PGE's opinion, this rule should provide the necessary data to inform how Community Action Program (CAP) agency funding can be shifted between the disbursing county agencies. Ultimately, PGE would like to see energy assistance funding available in places where it is most in need.

As PGE stated in prior comments, PGE is in the process of replacing its Customer Information System (CIS) as part of a more comprehensive, multiyear program. Following the workshop with stakeholders, PGE understands that the rule will direct utilities to produce the following in an annual report:

1. The number of accounts disconnected for non-payment;
2. The number of disconnections of Energy Assistance recipients over the last 12 months (as further discussed below);
3. The number of reconnections within a certain period: same day as disconnection (day 0); or reconnects the day after disconnection (day 1); and reconnects days 2 –7 after disconnection; and
4. The total number of meters at which service is disconnected, as a percentage of total meters. Staff did not provide this data point in the list used during the workshop, but this point was suggested during the workshop by Avista. PGE supports including this data point as a reporting requirement to provide greater context for the number of meters in the utility's service territory.

PGE's future CIS is expected to have the ability to produce all data points requested by Staff, but we would have difficulty producing all data points in the current CIS. One example is the number of disconnections of Energy Assistance recipients over the last 12 months. PGE recommends that reporting for the required data points be prospective, as data mining for past time periods could prove challenging in the transition of systems. In addition, reports should only include year to date data for the reporting calendar year.

With regard to Staff's request that parties respond to a list of follow-up items, PGE offers the following:

1. Sunset clause

PGE supports a sunset clause in the rule. PGE understands a sunset clause to be a termination date for the rule. In the context of this rule, this would mean utilities would not be required to report on disconnections following the sunset date. PGE supports an opportunity for review, prior to the sunset date, to comment on the effectiveness of the rule, and to check if parties are using the data in a way that reflects the intent of the rule.

2. Data confidentiality

During the workshop, Staff and stakeholders expressed concern around the confidentiality of data reported. PGE believes the data reported from this rule should be considered confidential utility customer information subject to confidential and non-disclosure agreement between the utilities and parties receiving such information pursuant to these rules. The rule should also be clear that data reported under it is subject to protection as confidential information under the Public Records law. In addition, PGE believes that leaving this data unprotected and generally available for public consumption could result in abusive use of the information. Public knowledge of areas that receive higher disconnection rates could lead to predatory practices, like reverse redlining, by groups looking to take advantage of communities with higher disconnection rates. The rule should include steps to protect utility customers.

3. What "assistance" programs should be included?

PGE defines "a customer that receives energy assistance" to be a customer who has received a low income energy assistance payment from an agency, made to the company on that customer's behalf within the previous twelve months. A customer for whom an energy assistance payment has been made more than twelve months previous is no longer a customer that receives energy assistance under PGE's definition.

4. Safe harbor clause

A safe harbor clause provides PGE a timeframe to submit an accurate first report while remaining in compliance with the rule. PGE suggests a safe harbor period of six months. PGE requests a safe harbor clause for the first reporting year, because of its new CIS coming online. A new report requires considerable IT work and the creation of new processes. This report may require refinement and code testing.

5. Number of days before reconnection

There are too many variables that influence customer behavior to provide explanations as to why service is reconnected after several days. PGE currently completes approximately 52.6% of its reconnections on the same day as disconnection, and 15.1% on the day after disconnection. PGE completes approximately 8.4% of its reconnections between 2 and 7 days after disconnection. PGE supports reporting three different periods of reconnection: same day reconnection (day of disconnection), next day reconnection (day after disconnection) and reconnection 2-7 days after disconnection.

6. Areas of reporting

PGE's new CIS is expected to be capable of producing data at the zip-code level. PGE is not capable of producing data at the county level in its current or future system. Each utility may be able to achieve a different granularity of data that will be able to best inform the number of disconnections in the utility's service territory. PGE supports reporting by zip code for its service territory.

7. Reporting period versus the amount of data

PGE believes the data points suggested by Staff should be reported on a quarterly basis and any greater frequency would impose an excessive burden on the utility, without commensurate benefit. Reporting quarterly would enable the adjusting of low income energy assistance funding among disbursing agencies to meet identified needs and gaps. Quarterly reporting would also highlight seasonal differences in disconnections. These reports could help examine the structure of CAP agency funding such that funding is disbursed more efficiently and equitably. After the safe harbor time period that would apply to the first reporting period, PGE recommends the subsequent reports be submitted within 60 days after the close of the quarter.

8. Usefulness of report

PGE hopes utility reporting will produce a valuable snapshot to inform the Commissioners of disconnections in the utility's service territory, and Commission policy. PGE would like this report to influence the allocation and movement of low-income energy assistance funding among agencies and lead to better allocation to meet the greatest need.

9. Severe weather moratorium integration

PGE does not expect the recently implemented severe weather moratorium rule (OAR 860-021-0407) to have an effect on the number of disconnections. PGE's internal practices are consistent with the new rule on severe weather moratoriums, thus the adoption of the rule should not impact PGE disconnections. Also, PGE is uncertain how integrating severe weather moratoriums would be incorporated into a metric. It would seem to require disconnection reporting on a more frequent than monthly basis, essentially requiring utilities to break down disconnection reporting by day, to note certain days within a month when the moratorium was in effect. PGE believes the administrative burden and increased IT development costs would not be outweighed by the value in reporting. If the severe weather moratorium is to be incorporated in this reporting, it should be through a cover letter noting which days during the reporting period the moratorium was in effect and should not change the standard report.

PGE also suggests that stakeholders, CUB and CAPO, provide how they would use the reported data. Understanding how the data will be used by stakeholders can lead to a more robust reporting process.

PGE also suggested in the workshop that the purpose or intent of the rule be specified directly within the rule. This would ensure that data responsive to the purpose or intent is being reported, and future requests for additional data may be checked against the purpose of the rule.

PGE appreciated the dialogue between parties in the last workshop and looks forward to continued discussions regarding what parties hope to gain from the rule and which data points should be included in reports. PGE appreciates consideration of the points set forth in these comments and looks forward to continued work with stakeholders toward the creation of a draft rule.

Sincerely,



Karla Wenzel
Manager, Pricing and Tariffs