Cascade NG comments.

From: Gross, Jennifer [mailto:Jennifer.Gross@cngc.com]
Sent: Friday, September 22, 2017 11:44 AM
To: BOYLE Phil <pjboyle@puc.state.or.us>
Subject: RE: AR 602 - Proposed Data Points

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Phil,

Cascade largely supports your notes below for a disconnect reporting rule. The one area we would like more clarification is on the 8th reporting data point, number of reconnections over 7 days. It would be helpful to have an upper limit to this. We suggest 20 days since that is when, per the rules, customer status is lost. We do not think customers off for 20 days are seeking assistance but rather, are not reconnecting for reasons like warmer weather. Tracking beyond 20 days is difficult.

Besides that, we believe we can comply with a rule as laid out below. As mentioned, it will require programming a query to generate the report.

Please let me know if you have questions about our recommendation.
Thanks
Jennifer

From: BOYLE Phil [mailto:phil.boyle@state.or.us]
Sent: Tuesday, September 19, 2017 4:26 PM
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Subject: AR 602 - Proposed Data Points

All,

I have read through all of your comments submitted after the AR 602 workshop in July, and I think I have sifted them down to something that is manageable. Before I try to create rule language, I wanted to run my thoughts past everyone for additional comments and suggestions.

Purpose of the Rule

First, let me address the purpose of the rule. While some are still unclear about the usefulness of a disconnect report, many seemed to accept that there is value. My initial thought was that the strongest argument in favor of the report was to provide CAPO information with which to determine when reallocation of funds between agencies might be necessary to meet the need – I still think this is a strong argument in favor of the report, but there are other reasons which may be less easy to quantify. Some of the arguments in favor included comments such as:

1. *"Access to better disconnection data will provide parties a better understanding of customer behavior, leading to better utility service and, hopefully, more precise affordability programs."*
2. *"Without consistent and continuous reporting, CAPO and other organizations will not have all the resources available to know if program changes are effective."*
3. *"CUB sees significant value in understanding the extent to which a disparity exists among demographic groups (low-income, etc) with regard to involuntary disconnections."*

I also think it is a value to the PUC Commissioners to have a general idea about the number of disconnects that occur in Oregon so they have a sense of whether utility efforts to reduce disconnections are adequate, and whether low-income energy assistance funding is making an impact. I also think the data may reveal information that we are presently unaware of - we don't know what the data may reveal.

Reporting Frequency

While some utilities expressed a preference for an annual or biennial report, most had no strong objection to providing a quarterly report with monthly data. I will propose quarterly reporting with monthly data.

Low-Income Recipient Definition

Low-income recipient will include any customer receiving LIHEAP, OEAP or any ratepayer funded bill payment assistance program within the last 12 months. Voluntary programs funded by shareholders, employees and customers will not be included.

Sunset Date

There will be no sunset date for the rule, but, consistent with ORS 183.405(1), we will have a review after the third full year to see if the report needs to be tweaked or other changes are needed.

Severe Weather Moratorium
The report should show the number of days in the quarter where a severe weather moratorium was imposed.

Safe Harbor
It was suggested that we need a safe harbor provision for utilities who may be unable to meeting the reporting requirement due to current or future CIS upgrades. I don't think this is necessary. I think the Commission can exercise enforcement discretion in these infrequent situations upon discussion with the utility. However, I am open to setting a date for submission of the initial reports that is later than the effective date of the rule to allow time for systemic changes and testing.

Data Confidentiality
Some utilities expressed a concern about data confidentiality. I do not agree that any of the data points listed below would be categorically exempt from disclosure to the public. Oregon's Public Records Law contains a limited number of exemptions from disclosure, and none appear to apply. We can't add an exemption to this statutory list with an administrative rule.

Data Points for Quarterly Report
   Companywide roll up - this data will be reported as a rollup of the entire company (in Oregon), broken down by month
1. Number of residential accounts
2. Number of involuntary disconnections
3. Percentage of residential disconnections
4. Disconnections of energy assistance recipients
5. Disconnections of Med Cert holders
6. Number of reconnections same day or next day (days 0-1)
7. Number of reconnections days 2-7
8. Number of reconnections over 7 days

   Geographic reporting area – this data will be included on the quarterly report for each geographic location, broken down by month (ZIP, community or Operational Unit)
1. Number of residential accounts
2. Number of disconnects
3. Disconnections of energy assistance recipients
4. Disconnections of med cert holders

Geographic Reporting Area
Most stakeholders felt reporting by ZIP code was doable, but a couple of utilities serve a large number of ZIP's potentially making such a report unwieldy. I think reporting by ZIP is the best way to understand and use the data, but I am open to consolidating ZIPs into geographic areas such as by community (over some population threshold or alternatively by utility operations center. For example, reporting by community for the Salem/Keizer area would combine 5 zip codes into a single

data point. In some cases, reporting by operations center may be more useful. PAC's Medford operations center serves at least 12 zip codes, these 12 (or more) ZIPs could be reported as a single data point named Medford Operations. I am still open to other suggestions, and may add flexibility to the rule language to allow utilities to report in a manner that best suits their needs – suggestions?

Please have additional comments back to me by October 2nd, then I will complete my first draft of proposed language.

Thanks,
Phil