



Portland General Electric Company
Legal Department
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Douglas C. Tingey
Associate General Counsel

May 26, 2017

Via Electronic Filing

Oregon Public Utility Commission
Attention: Filing Center
PO Box 1088
Salem OR 97308-1088

Re: UM ____ - Application for Partial Waiver of OAR 860-021-0405(5)

Attention Filing Center:

Enclosed for filing is Portland General Electric Company's Application for Partial Waiver of OAR 860-0211-0405(5).

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "DCT/ST", is written over the typed name of Douglas C. Tingey.

Douglas C. Tingey

DCT:lgh

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Application for Partial Waiver of OAR 860-
021-0405(5), Notice of Pending Disconnection
of Residential Electric or Gas Utility Service

**APPLICATION OF PORTLAND
GENERAL ELECTRIC COMPANY
FOR PARTIAL WAIVER OF OAR 860-
021-0405(5)**

Pursuant to OAR 860-021-0005, Portland General Electric Company (PGE) hereby requests that the Commission waive part of the requirements contained in OAR 860-021-0405(5). OAR 860-021-0405(5) requires that:

The energy utility must serve the 15-day notice of disconnection in person or send it by first-class mail to the customer's last known address. Service is complete on the date of personal delivery or on the day after the date of the US Postal Service postmark or postage metering.

PGE requests this partial waiver to allow PGE to send 15-day notices of disconnection to customers by email for those that have notified the company that email is their preferred method of communication.

A. Discussion

PGE currently has approximately 250,000 paperless billing customers receiving their monthly bills via email. PGE currently sends 15-day, 5-day and final notices of disconnection, when a bill is not paid, via the US Postal Service's first-class mail service, regardless of the customer's communication preference, to comply with OAR 860-021-0405. This waiver application applies only to sending 15-day notices of disconnection by first class mail to the

customer's last known address. PGE is not seeking waiver of the OAR 860-021-0405(8) requirements regarding 5-day notices of disconnection.

PGE is in the process of replacing its Customer Information System (CIS). The new system is expected to be placed into service in the second quarter of 2018. PGE would like to include the ability to send 15-day notices of disconnection by email in the design and implementation of the new system. Customers currently have the option to sign-up for paperless billing as a preferred channel of communication. Customers who have specified that they prefer email communications from PGE may not appreciate receiving items in the mail, as it may not be an effective, timely, or an expected form of communication for them. PGE seeks to improve customer experience and provide more personalized communication, consistent with the customer's preference. Customers can pay their bills in a variety of methods that are consistent with their preferences. Customers who elect paperless billing as their preferred method of communication currently agree to terms that specify electronic presentation of bills. All customers have the ability to set up and monitor their account through www.PortlandGeneral.com.

In 2016, PGE sent 831,053 15-day notices of disconnection by first class mail to residential customers and 43,097 15-day notices of disconnection by mail to commercial customers. Of the 831,053 residential 15-day notices sent, 145,410 were sent to residential customers who elected paperless billing as their preferred method of communication. Of the 43,097 notices sent to commercial customers, 2,940 were sent to commercial customers who elected paperless billing as their preferred method of communication. This represents approximately \$63,000 in postage and paper costs attributable to sending 15-day notices of disconnection to residential and commercial customers that elected paperless billing as their

preferred method of communication in 2016. This cost does not account for labor. The postage and paper cost of sending 15-day notices to residential and commercial customers that did not choose paperless billing as their preferred method of communication was \$311,000.

B. Request

For the reasons stated above, PGE respectfully seeks a partial waiver of the requirements of OAR 860-021-0405(5). It is a partial waiver because the waiver would apply only to customers who have communicated an email preference to us for communications from us to them. PGE also requests that the partial waiver be effective when PGE's new CIS system is put in service, currently expected to be in the second quarter of 2018. PGE would like to use its new CIS to send 15-day notices of disconnection by email, if the customer indicates that email is their preferred channel of communication.

PGE is filing this waiver application at this time to allow for the programming and testing in the new CIS system of the 15 day email disconnection notice functionality. PGE plans to begin to send 15-day notices of disconnection to customers by email, for those that have notified the company that email is their preferred method of communication, when the new CIS is on line in 2018.

PGE is mandated by OAR 860-021-0405(9)(B) to attempt to contact customers pending disconnection by telephone. If this partial waiver request is approved, customers will still receive telephone calls in compliance with the Administrative Rule. Calls provide an added layer of customer notification to the disconnection process.

PGE will also comply with OAR 860-021-0405(8), by serving five-day notices of disconnection via the US Postal Service's first class mail service, regardless of the customer's preferred channel of communication. If a disconnection notice that is sent by email is bounced

back due to an undeliverable status, the customer will automatically be opted out of email notices and given paper notices. PGE intends to communicate the changes resulting from the waiver, with customers, and provide education as necessary.

C. Communications

Communications regarding this application should be addressed to:

Karla Wenzel
Manager, Pricing and Tariffs
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In addition to the names above, informal questions or comments regarding this filing can be directed to Peter Davis at (503) 464-8068.

D. Conclusion

PGE believes that good cause exists to waive the requirements under OAR 860-021 0405(5), to send 15-day notices of disconnection by email for those that have notified the company that email is a customer's preferred method of communication. PGE seeks to implement this email notification when its new CIS is placed in service next year. PGE further believes that a gradual change to current processes by only sending 15-day notices of disconnection, and not 5-day notices of disconnection by email, may be more acceptable for customers at this time. This waiver would allow PGE to enhance customer experience and provide cost savings.

For all of the reasons described above, the Company requests that Commission approve the request for a partial waiver from the requirements of OAR 860-021-0405(5) as described herein.

DATED this ^{26th} day of May, 2017.



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