

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 602

In the Matter of
Rulemaking Regarding Service Disconnection
Reports for Energy Utilities

PORTLAND GENERAL ELECTRIC
COMPANY'S WRITTEN
COMMENTS

Portland General Electric Company (PGE) appreciates this opportunity to provide these written comments, as requested by ALJ Power, to memorialize the comments we made at the April 17, 2018 workshop of this docket. PGE's comments at the workshop, and herein, are comments in response to the proposed rulemaking filed March 1, 2018. PGE appreciates the opportunity to continue to advocate for our customers in this rulemaking.

At the workshop, and as we did in workshops prior to the notice of proposed rulemaking, we highlighted our concerns and recommended certain solutions. PGE would like to thank Staff for incorporating some of the feedback we provided.

However, comments we made regarding our concerns for customer confidentiality are not addressed in the draft rules. Thus, we reiterated our concerns at the workshop, and herein, for the formal record. We have concerns regarding the ability for a third party to obtain the disconnection reports we submit, and given that we are submitting Zip Code level detail, there is a risk that third parties may use the customer data in ways that are not intended by these rules and that work to the detriment of our customers and the utilities. Given that the PUC Staff weighs having the utilities submit the granular data, as in the public interest, we sought protection for this information, so it is not identified as a public record subject to disclosure to third parties. In our informal comments, we recommended that the draft rules: (1) be explicit about the intent of the rule (which will help reduce misuse)¹; (2) and provide confidentiality protections for the customer information.

Respectfully submitted this 30th day of April, 2018.



Robert Macfarlane
Portland General Electric
Rates and Regulatory Affairs

¹ There rules are intended to give the Commission and energy assistance organization information to better serve our customers in need. The rule does not intend to create right-to-sue. By stating the intent (i.e. the purpose) of the rule, the Commission will eliminate the potential for the rule to be used for other than its intended purpose.