

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**Waiver for Cash Payments**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Requesting Waiver for in-person payments by  
customers.

CAPO opposes any waiver to the rule

Portland General Electric (PGE) requests waiver to OAR 860-021-0405(11), allowing for customers to directly make payments to utility workers. CAPO does not approve of a waiver that would further distance the utility from its low-income customers. Last year, PGE had over 33,000 payments to prevent disconnections, or loss of service. Of those 33,000 fifteen percent were from payments made to utility workers. If customers lose another way to avoid loss of service, this could lead to higher disconnection rates. The commission should not grant a waiver without studying the issue of whether on-site payment increases/decreases loss of service.

Six years ago, Pacific Power requested the same waiver. Was there at any time a study or a review of information to see whether disconnections increased during this period? Without a further review CAPO cannot support a policy that could lead to increased disconnections.

Further, utilities have long made claims that continuing to distance itself from customers will make the utility workers safer. There has been little evidence that ending payments to on-site staff would improve workplace safety. PGE has provided no evidence for the requests for waiver.

CAPO requests the commission deny PGE's waiver and end the waiver for Pacific Power to study the issue of whether on-site payment reduces disconnections.

*Keith Kueny*

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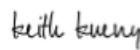
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