



January 13, 2019

Commissioner Decker
Oregon Public Utilities Commission
Salem, OR

Dear Commissioner Decker:

Community Action Partnership of Oregon (CAPO) is the State Association for Oregon's Community Action network of 17 Community Action Agencies and Oregon Human Development Corporation, a statewide agency serving farmworkers. CAPO and its members are part of the national Community Action Network – a network made up of more than 1,100 local, private, non-profit, and public agencies that work to alleviate and eliminate poverty. The vast majority of these agencies are Community Action Agencies (CAAs) created through the Economic Opportunity Act of 1964. CAAs were the first social service agencies to involve lower-income people as members of their Boards of Directors to help set policies, design programs and evaluate services intended to reduce or eliminate the causes and conditions of poverty.

Each CAA uses a community-based needs assessment to develop advocacy and service priorities to provide the most relevant, most effective services for its own community. Located in the areas of greatest need, local CAAs offer an extremely wide variety of programs that serve low-income children, families, and seniors. This community-based approach, in conjunction with the statewide network of CAPO members and resources, creates a unique and effective system for fighting poverty in Oregon. CAPO opposes any move to end availability for cash payments. Previously, the commission ruled without bothering to study or research the impact of removing cash payments at the door. Six years ago, the first waiver was granted for Pacific Power to avoid cash payments at the door. At no point, since this waiver was granted, has the commission held a hearing or meeting related to whether the waiver increased or decreased disconnection. Further, the waiver was expanded to include PGE service territory and not one person impacted by the waiver was asked to discuss their experience paying at the door and how that decision would make it more difficult. PGE has a plan to expand cash payments to include western union locations while eliminating the fees with cash payment. I have heard no such plan from Cascade on how they plan to offset this loss of payment with expanded use of cash payment options.

This Commission continues to avoid client contact and client outreach while making decisions that disproportionately affect low-income Oregonians. The commission should not, once again, decide without a thorough review of the policy and its impact, and should not be making decisions without requesting comments from parties that the decision will target. CAPO requests a denial to the waiver request and a review of previous waiver approvals and their impact on low-income communities.

Sincerely,

Keith Kueny

Keith Kueny
Energy Policy Coordinator

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