

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of:

PORTLAND GENERAL ELECTRIC
COMPANY,

Application for Waiver of Requirements of
OAR 860-021-0414, Equal Payment Plans for
Residential Electric and Gas Service.

**APPLICATION OF PORTLAND
GENERAL ELECTRIC COMPANY
FOR WAIVER OF OAR 860-021-0414,
EQUAL PAYMENT PLANS FOR
RESIDENTIAL ELECTRIC AND GAS
SERVICE.**

Pursuant to OAR 860-021-005¹, Portland General Electric Company (“PGE” or the “Company”) hereby requests the Public Utility Commission of Oregon (“Commission”) waive OAR 860-021-0414, Equal Payment Plans for Residential Electric and Gas Service (“Rule”), which requires that the Company make equal-payment plans available to Residential Customers as well as provide for an annual adjustment between the estimated charge and the actual charges. PGE requests a waiver of the Rule through March 31, 2019. PGE has discussed this waiver request with the Commission’s Consumer Services Staff (“Staff”) and the Citizen Utility Board of Oregon.

A. Background

PGE believes that good cause exists to waive the requirements of OAR 860-021-0414, which requires electric companies and gas utilities to make equal-payment plans available to residential customers and provide for an annual adjustment between the estimated charge and the actual charges. PGE’s equal payment plan option works in the following way: the customer’s monthly bill amount is calculated based on an annual average amount from the last twelve (12)

¹ OAR 860-021-0005 provides in pertinent part that ‘[up]on request ...the Commission may waive any of the Division 021 rules for good cause shown.’

months' usage. The annual true-up for Equal Pay then determines the variance between the average energy billed and the actual energy consumed.

In PGE's previous customer information system ("Banner Customer Information System"), if there was a variance, that amount was included as part of the next year's Equal Pay monthly amount due after the annual true-up. In PGE's new customer information system ("Oracle Customer Care and Billing System" or "System"), the annual variance does not automatically calculate into the amount due for the Customer's following year's Equal Pay monthly amount. Once PGE discovered this issue, PGE paused the System's automatic annual true-up process until we could make System changes that would address the issue, that is, dealing with the variances in customer's average energy billed versus the actual energy consumed.

PGE is currently working on changes to the System that will enable the System to deal with the variance during the annual true-up process.

In the meantime, PGE is taking temporary measures to mitigate harm to customers, and to the Company. The Company further notes that this waiver, if granted, will not affect the Commission's ability to request information from PGE or investigate concerns raised by customers or Staff.

B. Discussion

The Company believes the requested temporary waiver of the Rule is appropriate for reasons stated in this application.

In the early 2000s, after the Banner Customer Information System had been operational for a couple of years, PGE discovered some glitches with Equal Pay, and ultimately fixed those glitches. As a result, PGE was particularly vigilant during the recent Operational Readiness

Testing of the new Oracle Customer Care and Billing System in the spring of 2018. PGE had been monitoring the functionality of Equal Pay, when converting the Banner Customer Information System to the Oracle Customer Care and Billing System. PGE discovered, during the monitoring, that the new System was not performing the required annual true up for Equal Pay customers as PGE had expected². PGE then turned off the ‘true up’ function of the system and the monitor logic, and intends to keep it turned off until the design of this functionality could be re-assessed and updated³.

PGE’s initial estimate was that the fix for the Equal Pay functionality could be done within the first few months after ‘go live’ in May 2018. After further evaluation of the required work, PGE determined the best course would be to research best practices with other utilities that have a similar system or deal with variance differently than how PGE dealt with variance in Banner Customer Information System. We have since completed our research and will begin the work in November 2018, and we estimate that this work will be completed in early 2019. This timeline allows for the design work to be completed and tested, for PGE to communicate with customers, and then implemented.

There are about 80,000 customers participating in Equal Pay. By the end of 2018, 34,000 of those Equal Pay customers will potentially be affected by the challenges we are experiencing with the true up functionality. As an interim solution, PGE is identifying customers with large debit or credit variances, and is proactively contacting them to offer options to get their accounts caught up. The options include providing bill solutions like time payment agreements, one-time payments to catch up their bills, or extending durations of existing time payment agreements. As

² OAR 860-021-0414 requires the plan to provide “for an annual adjustment between the estimated charge and the actual charges.”

³ The true-up functionality currently requires significant manual work to support customers on Equal Pay.

alluded to above, prior to turning on the true-up functionality, once it is redesigned and tested, PGE will be communicating with all affected customers.

PGE has met with Commission Consumer Staff regularly to discuss issues associated with the new System, and has kept Staff apprised of the challenges with the Equal Pay functionality of the new System. PGE will continue to update Staff on our progress with the fix of the Equal Pay functionality, and will inform the Commission once the functionality has been fixed.

C. Communications

Communications regarding this application should be addressed to the following email address: pge.opuc.filings@pgn.com

With copies to:

Jay Tinker
Portland General Electric Company
121 SW Salmon Street, 1WTC0306
Portland, OR 97204
Telephone: 503-464-7002
E-Mail: pge.opuc.filings@pgn.com

Loretta Mabinton
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, OR 97204
Telephone: 503-464-7822
E-Mail: Loretta.mabinton@pgn.com

D. Conclusion

As shown above, good reason exists for the Commission to waive the requirements under OAR 860-021-0414. PGE will continue to expedite work on fixing the problem with the Equal Pay functionality and will take steps to mitigate harm to customers.

Therefore, PGE respectfully request that the Commission grant the waiver of OAR 860-021-0414 as requested herein until March 31, 2019.

DATED this 20th day of November, 2018.

Respectfully submitted,



Loretta Mabinton
Associate General Counsel
Portland General Electric Company
121 SW Salmon Street,
Portland, OR 97204