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July 31, 2019

Oregon Public Utility Commission
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1631 Cascade Natural Gas' Petition for a Waiver of OAR 860-021-0405(11)

Dear Filing Center:

Cascade Natural Gas Corporation, pursuant to the provisions of ORS 756.040 and in accordance with OAR 860-021-0005 encloses for filing its Petition for Waiver of OAR 860-021-0405(11).

If you have any questions concerning this submittal, please contact Michael Parvinen at (509) 734-4593.

Sincerely,

Pamela Archer

Pamela Archer
Supervisor, Regulatory Analysis

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM _____**

In the Matter of
Cascade Natural Gas Corporation
Petition for a Waiver of OAR 860-021-0405(11)

PETITION OF CASCADE NATURAL
GAS CORPORATION

1 Cascade Natural Gas Corporation (Cascade or Company) files this petition under the
2 provisions of ORS 756.040 and in accordance with OAR 860-021-0005. Cascade seeks an order
3 from the Public Utility Commission of Oregon (Commission) granting a waiver of OAR 860-
4 021-0405(11). OAR 860-021-0405(11) requires the utility to accept reasonable partial payment
5 of the overdue balance from a customer if personal contact is made. The Company’s current
6 practice is to knock on the door while on site for disconnection and allow for customers to make
7 payment at the door. The Company respectfully requests a waiver of OAR 860-021-0405(11) to
8 allow the Company to discontinue collecting payment at the door.

I. Background

10 Safety is a top priority for Cascade. The Company continuously reviews its operations
11 and business practices in order to maintain a safe working environment for all its employees.
12 Business practices allowing for the risk of injury or death of an employee as a result of
13 workplace violence must be revised to provide a safer working environment. One of those key
14 business practices is allowing for the collection of payments in the field when a customer is
15 scheduled to be disconnected.

16 Field employees who are known to carry money in their vehicle are inherently at risk for
17 being attacked and robbed as they travel their daily route. The employee also potentially collects

1 payment: either cash, check, or money order. Payments are then stored in a Company vehicle
2 until they can be dropped off at a local office or a pay station, and the public can be aware of this
3 fact. This puts employees at risk for being victims of theft or robbery.

4 The Occupational Safety and Health Administration's (OSHA) General Duty Clause
5 requires employers to furnish each employee a place of employment free from recognized
6 hazards that can be considered harmful to an employee.¹ Multiple governmental agencies have
7 researched workplace violence and provided useful information and statistics regarding
8 workplace violence, including identification of factors leading to higher risk of violence to occur.
9 Such research identified notable risks to employees exchanging money with the public.

10 Removing the requirement to accept payment during the personal contact will
11 significantly reduce the possibility of workplace violence. Further, waiving this requirement will
12 keep employees from carrying payments with them throughout the day. Not collecting payment
13 in the field reduces the risk that a member of the general public will commit theft or robbery and
14 reduces the risk of a customer's banking information being obtained from stolen checks.

15 Cascade is constantly reviewing the Company's policies for ways to improve safety for
16 the Company's employees. The Company's intention to stop collecting payment at the door
17 during a collection will not remove all risk, but it is a pro-active approach toward minimizing the
18 risk and providing a safer workplace. Injuries or death to employees cannot be an accepted cost
19 of doing business.

20 **II. Governing Authority**

21 Commission rules require utility employees to accept payment from customers while
22 onsite to disconnect service.

¹ OSHA, General Duty Clause, 5(a)(1)

1 OAR 860-021-0405(9) provides as follows:

2 The energy utility must make a good-faith effort to personally contact the
3 customer or an adult at the residence to be disconnected on the day the energy utility
4 expects to disconnect service or, where the service address has remote disconnection
5 capability installed, at least three business days prior to the day the energy utility expects
6 to disconnect service:

- 7
8 (a) If contact is made, either in person or via the telephone, the energy utility must
9 advise the customer or an adult at the residence of the proposed disconnection; or
10 (b) If contact is not made, the energy utility must:

11 (A) Leave a notice in a conspicuous place at the residence informing the customer
12 that service has been, or is about to be, disconnected.²

13
14 OAR 860-021-0405(11) provides:

15 When the energy utility makes personal contact under this rule, the utility's
16 representative making contact is empowered to accept reasonable partial payment of the
17 overdue balance under the time-payment provisions of OAR 860-021-0415.

18
19 OAR 860-021-0005 allows the Commission to grant waivers of Division 21 rules for
20 good cause shown.

21 III. Argument

22 A. Granting the Waiver will not Harm Customers because They Receive Multiple 23 Notices Prior to Disconnection

24 Disconnecting natural gas service for non-payment is always a utility company's
25 last resort. Cascade already provides customers with multiple notifications of account balances
26 and potential disconnection of service. Specifically, the Company provides the following before
27 a site visit to disconnect service:

- 28 1. Monthly billing amount and due date;
29 2. Automated call provided that an appropriate phone number is available;
30 3. Past due notice clearly indicating the account is past due, showing the
31 amount due and both a "must be paid by" and "due by date" (same date);

² OAR 860-021-405(9)(b) also contains a subsection (B) that is not applicable to Cascade Natural Gas Corporation.

- 1
- 2
- 3 4. Urgent notice indicating the amount due and both a “must be paid by” date
- 4 and “due by” date (same date);
- 5
- 6 5. Personal phone call out by a Credit Agent (provided phone information is
- 7 available) prior to every disconnect.
- 8

9 As illustrated above, this billing and collection process provides customers with
10 five notifications using various communication methods prior to the disconnection visit, giving
11 ample time to arrange for a payment to be made prior to the Company visiting the site.

12 **B. Cascade Offers Numerous Payment Methods**

13 Utilities are expanding payment methods beyond the traditional use of U.S. Mail
14 and accepting payments at local offices. Technological advances have allowed customers to
15 utilize newer and more convenient payment methods. Cascade now offers the following
16 payment methods:

- 17 1. Automatic Payments: through the customer’s bank - no fee.
- 18 2. Online Account Services: Online payment through the Company’s website,
- 19 available 24 hours a day, seven days a week – no fee.
- 20 3. U.S. Mail: cost of a stamp plus the cost of a check or money order.
- 21 4. Convenience Pay®: The Company has 16 available pay stations in Oregon.
- 22 These pay stations are free if done through Western Union® Convenience
- 23 Pay®.
- 24
- 25 5. Western Union® Speedpay® Bill Payment Service: by phone or online
- 26 anytime \$1.99 fee.
- 27
- 28 6. Pay at time of disconnection visit - \$20.00 fee.

29 As shown above, the Company offers numerous no-cost or low-cost payment
30 methods for customers. The Company also offers numerous payment options
31 for increased customer convenience. Online and pay-by-telephone payment options allow
32 customers to make payment from their own residence, any Internet connection, or through their

1 mobile phones, and provide almost immediate account updating. While the majority of Cascade
2 customers choose the no-and low-cost options, other customers have chosen the most expensive
3 payment option, paying the field collector at the door at the time of disconnection, which
4 includes a field visit charge of \$20.00.

5 Currently, the Company receives 29.6% of its payments in Oregon via the postal service,
6 while the remaining payments are made through other means. During 2018, there were 13,709
7 payments processed by the Company's Convenience Pay® network in the state of Oregon.
8 Finally, there were 480 payments received in 2018 during a field visit in lieu of a disconnection.

9 Of these 480 payments that were received during a disconnection visit, 55 visits were repeat
10 visits which means approximately 11.5% were customers who used the service technician
11 dispatched to perform a disconnection as a field collection agent. Given the number of other
12 payment options available, however, allowing the Company to discontinue payments in the field
13 will not harm customers.

14 **IV. Request for Waiver**

15 OAR 860-021-0005 allows the Commission to grant waivers of Division 21 rules
16 for good cause shown. The Company can no longer support business practices allowing for the
17 increased risk of injury or death to an employee. Safety is a top priority for the Company. One
18 way to reduce risk of injury or death is to eliminate the requirement that an employee carry
19 customer payments. Removing the requirement to accept payment would reduce the risk to the
20 Company's field employees, eliminate the risk of customer's personal banking information being
21 stolen and used fraudulently and eliminate the opportunity for robbery or theft. Ensuring a safe
22 working environment for employees is in the public interest and the Company's request is
23 consistent with underlying rules and applicable statutes.

1 Cascade respectfully seeks waiver of the specific provisions of OAR 860-021-
2 0405(11) requiring the utility to collect payment from customers during the site contact. Good
3 cause exists to grant the Company's request for waiver. Such a waiver would increase the safety
4 of employees without sacrificing customer service. Further, customers will not be harmed.
5 Customers receive a variety of notices of balances owed and pending disconnection notices.
6 Customers may pay bills through various no-or low-cost payment methods. Finally, eliminating
7 the ability to pay at the door removes the most expensive payment option from the list.

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9 DATED: July 31, 2019

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Sincerely,



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