



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

April 1, 2020

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

**RE: UM 1631 PGE's Application of a Partial Waiver of OAR 860-021-0410(4),
Emergency Medical Certificate for Residential Electric**

Pursuant to Oregon Administrative Rule (OAR) 860-021-0005, Portland General Electric Company (PGE) hereby submits for expedited consideration a partial waiver request of Oregon Administrative Rule (OAR) 860-021-0410(4) Emergency Medical Certificate for Residential Electric Customers effective immediately.

As an essential service provider PGE feels a responsibility to deliver safe and reliable service to our customers. Times like these our customers need us more than ever and we are here to help.

PGE requests this partial waiver for the next sixty days of the requirements of OAR 860-021-0410(4). PGE requests this waiver due to the ongoing public health emergency in Oregon caused by COVID-19. Oregon's governor declared a state of emergency on Sunday March 8, 2020. Due to this unforeseen pandemic, PGE will not require customers with an approaching expired medical certificate to obtain a new medical certificate within the 15 days before the certificate's expiration date.

Should you have any questions or comments regarding this filing, please contact me at (503) 464-8954 or Mary Widman at (503) 464-8223. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1631

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Application for Partial Waiver of OAR 860-
021-0410(4) Emergency Medical Certificate
for Residential Electric

**APPLICATION OF PORTLAND
GENERAL ELECTRIC COMPANY
(EXPEDITED CONSIDERATION
REQUESTED)**

Pursuant to OAR 860-021-0005, Portland General Electric Company (PGE) hereby submits to the Commission this request for a partial waiver of the requirements of OAR 860-021-0410(4), Emergency Medical Certificate for Residential Electric Customers for 60 days, effective immediately.

OAR 860-021-0410(4) requires that:

Emergency Medical Certificate for Residential Electric

(4) An emergency medical certificate shall be valid only for the length of time the health endangerment is certified to exist, but no longer than six months without renewal for certificates not specifying chronic illnesses and no longer than twelve months for certificates specifying illnesses identified as chronic by a “Qualified Medical Professional” as defined in this rule. At least 15 days before the certificate’s expiration date, an energy utility will give the customer written notice of the date the certificate expires unless it is renewed with the utility before that day arrives.

PGE requests this waiver to due to the ongoing public health emergency in Oregon caused by COVID-19. Oregon’s governor declared a state of emergency on Sunday March 8, 2020 due to this unforeseen pandemic.

Discussion

PGE currently has approximately 2,700 customers with medical certificates. If approved, PGE will suspend under OAR 860-021-0410(4) Emergency Medical Certificates for Residential Electric Customers which states, “An emergency medical certificate shall be valid only for the length of time the health endangerment is certified to exist, but no longer than six months without renewal for certificates not specifying chronic illnesses and no longer than twelve months for certificates specifying illnesses identified as chronic by a “Qualified Medical Professional” as defined in this rule. At least 15 days before the certificate’s expiration date, an energy utility will give the customer written notice of the date the certificate expires unless it is renewed with the utility before that day arrives.” Due to the ongoing public health emergency in Oregon caused by COVID-19, and limited medical appointments and facilities open for non-critical needs, OAR 860-021-0410(4) may be challenging for customers.

Request

For the reasons stated above, PGE respectfully seeks a partial waiver of OAR 860-021-0410(4) renewing a medical certificate, allowing customers extend the amount of time to renew. PGE requests this partial waiver due to the ongoing public health emergency in Oregon caused by COVID-19. Oregon’s governor declared a state of emergency on Sunday March 8, 2020. As an essential service provider PGE feels a responsibility to deliver safe and reliable service to our customers during this uncertain time. PGE is looking at measures it can take to assist its customers. Due to this unforeseen pandemic, PGE will not require customers with an approaching expired medical certificate to obtain a new medical certificate within the 15 days before the certificate’s expiration date. PGE will notify the customer of written notice of the date the medical certificate expires and provide a six-month extension to renew with the utility and up

to a one-year extension due to this public health emergency. PGE will reassess the situation and may seek to extend this waiver.

Communications

Communications regarding this application should be addressed to:

Robert Macfarlane
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Douglas Tingey
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E-mail: doug.tingey@pgn.com

Conclusion

OAR 860-021-0005 allows the Commission to grant waivers of Division 21 rules for good cause shown. PGE respectfully seeks a partial waiver for the next 60 days of the requirements of OAR 860-021-0410(4) renewing a medical certificate, effective immediately. PGE requests this partial waiver due to the ongoing public health emergency in Oregon caused by COVID-19. Oregon's governor declared a state of emergency on Sunday March 8, 2020, due to this unforeseen pandemic.

Good cause exists to grant the Company's request for the waiver. Such a waiver would allow PGE to continue providing electricity service to utility customers during this state of emergency.

For all the reasons described above, the Company requests that Commission approve this request for a waiver effective upon Commission approval.

DATED this 1st day of April 2020.

\s\ Robert Macfarlane

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