



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204
PortlandGeneral.com

May 7, 2018

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

**RE: Request for Partial Waiver of OAR 860-021-0205(1) PGE's Advice No. 18-07,
Deposits for Residential Customers**

Enclosed for filing in PGE's Advice No. 18-07, Deposits for Residential Customers, is a Request for Partial Waiver of OAR 860-021-0205(1) for expedited consideration.

Should you have any questions or comments regarding this filing, please contact me at (503) 464-8954.

Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

A handwritten signature in blue ink that reads "Rob Macfarlane". The signature is written in a cursive, flowing style.

Rob Macfarlane
Interim Manager, Pricing and Tariffs

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY'S,

REQUEST FOR PARTIAL WAIVER OF
OAR 860-021-0205(1)

REQUEST FOR WAIVER

**EXPEDITED CONSIDERATION
REQUESTED**

Pursuant to ORS, 860-021-0005 and OAR 860-021-205(6), Portland General Electric Company (“PGE” or “the Company”) submits this request seeking a waiver, which, if granted, will allow PGE to provide more liberal arrangements for payment of deposits than those set forth in OAR 860-021-205(1). Advice No. 18-07 is being considered by the Commission at the May 8, 2018 public meeting. PGE intends for this request to be considered with that advice filing, and requests expedited consideration.

Currently the rule indicates that, should the utility require a deposit, the customer or applicant may pay the deposit in full or in three installments. However, the rule goes on to state that, “[e]xcept for the last payment, installments shall be the greater of \$30 or one-third of the deposit.”

PGE seeks to simplify its deposit installment-payment methodology, to allow residential customers’ deposits, including the average deposit amounts reflected in Schedule 310, to either be paid in full or, alternatively, paid in three *equal* installments, even though such installment payments may each be less than \$30.00. PGE believes this methodology is easier to explain to customers and easier to implement with its new billing system that is scheduled to go-live soon, [rather than incurring the expense of reprogramming the system. Given the small amount of

residential customer deposits less than \$90, the cost to reprogram the system from the default settings would be higher than any potential impacts to uncollectibles.

Moreover, PGE anticipates that it will be “going-live” with its new billing system in a matter of days, and this waiver, if granted, will insure that deposit installments, if required, are calculated appropriately by whatever means are necessary and communicated accurately to customers.

In addition, Staff, in the public meeting memo for Advice No. 18-07, indicates support for a waiver of the \$30 minimum for the first two installments of deposit payments.

Alternatively, Staff notes that it would support a partial waiver of OAR-860-021-0205 for this Schedule to the extent it requires the first and second payment to be \$30 or greater. Such a waiver would remove the requirement that the installments paid by the customer be at least \$30. The “Multi-Family Dwellings – Any other combination” category of deposit could then remain at \$72 and may not require a programming change. The customer could be authorized to pay the installments in three equal payments of \$24 each. If requested, Staff would support such a waiver.

Contemporaneous with this request, PGE is supplementing Advice No. 18-07 to remove the request to modify the category indicated in the Staff report from \$72 to \$90.

CONCLUSION AND EXPEDITED CONSIDERATION REQUEST

For the reasons discussed above, PGE requests that the Commission issue an order waiving that portion of OAR 890-0021-205(1) requiring that all residential deposit installment payments, with the exception of the last one, be the greater of \$30 or one-third of the deposit. Accordingly, expedited consideration of this motion is requested.

DATED this 7th day of May, 2018.

Respectfully submitted,

Cece L. Coleman

Cece L. Coleman
Assistant General Counsel
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(503) 464-7831 phone
(503) 464-2200 fax
Cece.Coleman@pgn.com