



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 860-021-0130(2),
Meter Test**

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) 860-021-0130(2) Meter Test 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 860-021-0130(2) due to the ongoing public health emergency in Oregon caused by COVID-19. PGE is still conducting meter testing accuracy also known as high bill testing per the requirements of the OAR and tariff. PGE is requesting that testing without the customer / designated representative present in order to limit our field employee's exposure and to adhere to the CDC recommendations.

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-
021-0130(2) Meter Test

**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 860-021-0130(2), Meter Testing and Accuracy for 60 days, effective immediately. OAR 860-021-0130 states that any customer may ask the energy utility to test a meter for a high bill. Such tests shall be made within 20 working days of the request at no cost to the customer for the first test. The energy utility may not charge the customer for additional tests within 12 months if the meter is found to register outside the two percent accepted tolerance standard under normal operating conditions. PGE's Tariff Schedule 300 Meter Test Charge, Rule M, Section 1.C. is consistent with this rule.

OAR 860-021-0130 requires that:

Meter Test

- (1) Any customer may ask the energy utility to test a meter. Such tests shall be made within 20 working days of the request at no cost to the customer. If a customer requests more than one meter test within any 12-month period, the energy utility may charge the customer to recover the reasonable cost of the test. The energy utility may not charge the customer if the meter is found to register outside the 2 percent accepted tolerance standard under normal operating conditions.
- (2) A customer and/or a designated representative shall have the right to be present at any meter test. The test shall be conducted at a mutually acceptable time during regular business hours.
- (3) A written report showing the customer's name, the request date, the address where the meter has been installed, the meter's number, the date tested, and the test result shall be supplied to the customer within a reasonable time after completing the test.

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.

Discussion

PGE is already practicing and putting forth the recommendations from the Center for Disease Control (CDC) of a six-foot social distancing. PGE is still conducting meter testing accuracy also known as high bill testing per the requirements of the administrative rule and tariff. PGE respectfully requests a waiver of 860-021-0130(2), which states, *"A customer and/or a designated representative shall have the right to be present at any meter test. The test shall be conducted at a mutually acceptable time during regular business hours."* PGE is requesting that testing without the customer / designated representative present in order to limit our field employee's exposure and to adhere to the CDC recommendations.

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. Due to this unforeseen pandemic, PGE will continue to conduct Meter Tests for high bill testing but also limiting the restrictions of our field employee's exposure to the public due to this public health emergency.

Request

For the reasons stated above, PGE respectfully seeks a partial waiver of the requirements of 860-021-0130(2), Meter Testing and Accuracy for 60 days, effective immediately. PGE requests this waiver due to the ongoing public health emergency in Oregon caused by COVID-19. PGE will reassess the situation and may seek to extend this waiver.

Communications

Communications regarding this application should be addressed to:

Robert Macfarlane
Manager, Pricing and Tariffs
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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 waiver of the specific provisions of the requirements of 860-021-0130(2), Meter Testing and Accuracy for 60 days, effective immediately. 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.

Good cause exists to grant the Company's request for the partial waiver. Such a waiver would allow PGE to continue providing electricity service to utility customers during this state of emergency while limiting our field employee's exposure to the public due to this public health emergency.

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

DATED this 1st day of April 2020.

\s\ Robert Macfarlane

Robert Macfarlane
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