



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

April 15, 2022

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 860-021-0405(5)

Pursuant to Oregon Administrative Rule (OAR) 860-021-0005, Portland General Electric Company (PGE) hereby submits for expedited consideration a partial waiver request of OAR 860-021-0405(5), Notice of Pending Disconnection of Residential Electric Utility Service.

PGE requests this partial waiver to allow PGE to continue to send 15-day notices of disconnection to customers by email for those that have notified the company that email is their preferred method of communication. PGE's current partial waiver of OAR 860-021-0405(5) has expired on April 1, 2022, therefore, PGE is requesting an additional two years to continue to email 15-day notices of disconnection by email.

Should you have any questions or comments regarding this filing, please contact me at (503) 464-8954 or Mary Widman at mary.widman@pgn.com. 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-
021-0405(5), Notice of Pending Disconnection
of Residential Electric or Gas Utility Service

**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 expedited request for a continued partial waiver of OAR 860-021-0405(5). PGE previously requested a partial waiver of 860-021-0405(5) which was approved by the Commission and effective April 1, 2018, with a sunset date of April 1, 2020. PGE then requested an extension of the partial waiver for an additional two years which was approved in Commission Order 20-110. PGE now seeks a waiver extension for an additional two years with a sunset date of April 1, 2024.

OAR 860-021-0405(5) requires that:

The energy utility must serve the 15-day notice of disconnection in person or send it by first-class mail to the customer's last known address. Service is complete on the date of personal delivery or on the day after the date of the US Postal Service postmark or postage metering.

PGE requests this partial waiver to allow PGE to continue to send 15-day notices of disconnection to customers by email for those that have notified the company that email is their preferred method of communication.

Discussion

PGE currently has approximately 475,000 paperless billing customers receiving their monthly bills via email. PGE currently sends, 5-day and final notices of disconnection, when a bill is not paid, via the US Postal Service's first-class mail service, regardless of the customer's communication preference, to comply with OAR 860-021-0405. This waiver application applies only to sending 15-day notices of disconnection by first class mail to the customer's last known address. PGE is not seeking waiver of the OAR 860-021-0405(8) requirements regarding 5-day notices of disconnection.

Customers currently have the option to sign-up for paperless billing as a preferred channel of communication. Customers who have specified that they prefer email communications from PGE may not appreciate receiving items in the mail, as it may not be an effective, timely, or an expected form of communication for them. PGE seeks to continually improve customer experience and provide more personalized communication, consistent with the customer's preference. Customers can pay their bills in a variety of methods that are consistent with their preferences. Customers who elect paperless billing as their preferred method of communication currently agree to terms that specify electronic presentation of bills. All customers have the ability to set up and monitor their account through www.PortlandGeneral.com.

The table below shows for 2018 and 2019 residential and commercial customers that were sent 15-day notices of disconnection by first-class mail and customers that elected paperless billing as their preferred method of communication. In 2018, zero notices were sent to commercial customers by way of first-class mail and /or paperless billing. The 2018 and 2019 volumes differ due to the Credit Collection & Business (CCB) implementation and delay in credit activity in 2018.

In addition, on March 13, 2020, PGE filed a waiver of the requirements of OAR 860-021-0126 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 the unforeseen pandemic, PGE has not been charging late payment charges due to the public health emergency. PGE also ceased disconnection of all utility customers for nonpayment during the public health emergency. PGE resumed disconnections for commercial accounts in November 2020 and for residential accounts in August 2021.

Year	Description	Customer	Number of Notices
2018	Email	Residential	45,976
2018	Postal	Residential	72,206
2018	Email	Commercial	0
2018	Postal	Commercial	0
2019	Email	Residential	300,031
2019	Postal	Residential	424,084
2019	Email	Commercial	9,229
2019	Postal	Commercial	34,059
2020	Email	Residential	351,472
2020	Postal	Residential	515,932
2020	Email	Commercial	10,227
2020	Postal	Commercial	53,821
2021	Email	Residential	388,164
2021	Postal	Residential	487,534
2021	Email	Commercial	9,186
2021	Postal	Commercial	45,414
2022	Email	Residential	102,217
2022	Postal	Residential	118,914
2022	Email	Commercial	2,534
2022	Postal	Commercial	11,241

Request

For the reasons stated above, PGE respectfully seeks a continued partial waiver of the requirements of OAR 860-021-0405(5). It is a partial waiver because the waiver would apply only to customers who have communicated an email preference to us for communications from us to them, and only to 15-day notices. PGE respectfully seeks an expedited request to continue the partial waiver previously granted by the Commission that expired on April 1, 2022. PGE seeks a waiver for an additional two years.

PGE is mandated by OAR 860-021-0405(9)(B) to attempt to contact customers pending disconnection with an additional form of communication, currently by telephone. If this partial waiver request is approved, customers will still receive telephone calls in compliance with the administrative rule. This notification provides an added layer of customer communication to the disconnection process.

PGE will also comply with OAR 860-021-0405(8), by serving five-day notices of disconnection via the US Postal Service's first-class mail service, regardless of the customer's preferred channel of communication. If a disconnection notice that is sent by email is bounced back due to an undeliverable status, the customer will automatically be opted out of email notices and given paper notices.

PGE appreciates the work currently being done by Staff which provides the opportunity to review and update the OAR's outlined in Division 21 in order to better communicate with PGE customers using their preferred communication preferences and modernized technology. This will also help to eliminate the need for this waiver in the future if approved.

Communications

Communications regarding this application should be addressed to:

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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 of the specific provisions of OAR 860-021-0405(5). PGE requests this partial waiver to allow PGE to continue to send 15-day notices of disconnection to customers by email for those that have notified the company that email is their preferred method of communication.

PGE's current partial waiver of OAR 860-021-0405(5) has expired on April 1, 2022, therefore, PGE is requesting an additional two years to continue to email 15-day notices of disconnection by email.

Good cause exists to grant PGE's request for the partial waiver. The partial waiver has been authorized since 2018 and an extension will allow customers to continue choosing their preferred method of receiving service-related communications. PGE's paperless customers' preferences and their expectations for how they receive communications like the 15-day notice support a finding of good cause.

For all the reasons described above, PGE requests that Commission approve this request for an extension of the partial waiver effective for two years.

DATED this 15th day of April, 2022.

\s\ Robert Macfarlane

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