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Subject: FW: AR 601 Severe Weather Moratorium
Date: Wednesday, November 09, 2016 11:48:35 AM
Attachments: [DOJ approved rule language.docx](#)

AR 601 Participants:

Please see Phil Boyle's email below. If you provide informal feedback to Mr. Boyle, please also send to everyone on this email (the AR 601 service list).

Thank you.

Diane Davis

Administrative Hearings Division

Public Utility Commission of Oregon

diane.davis@state.or.us

(503) 378-4372

From: BOYLE Phil
Sent: Wednesday, November 09, 2016 11:37 AM
To: DAVIS Diane
Subject: AR 601

All,

Staff has reviewed all of your verbal and written comments from the workshop for AR 601 and sought to craft a rule which meets everyone's needs (working draft attached). As always this required compromise, so if anybody is completely satisfied we will be very surprised. Here are the highlights:

1. The winter temperature threshold is set at "less than 32 degrees". Setting the threshold

at one degree below the freezing mark seems a reasonable compromise which generally lessens the number of moratorium days, but does not overly burden customers.

2. For the summer threshold, staff chose the Heat Index Advisory as the combination of temperature and humidity seems more impactful on health than temperature alone. The National Weather Service defines a Heat Advisory as follows:

Heat Advisory—A Heat Advisory is issued within 12 hours of the onset of extremely dangerous heat conditions. The general rule of thumb for this Advisory is when the maximum heat index temperature is expected to be 100° or higher for at least 2 days, and night time air temperatures will not drop below 75°.

3. Once the moratorium is declared, it remains in effect for at least 24 hours. If the utility declares the moratorium at 8 AM on a given day, it remains in effect until 8 AM the following day unless extended due to continuing severe conditions. If the utility declares the moratorium based on the forecast, but the temperature rises above the threshold that day (winter), the moratorium stays in effect for the entire 24 hours at a minimum. Same is true for the summer threshold.

4. Staff chose the national weather service as the local reporting station, but we are open to alternatives if there is not a NWS service station nearby one of your service locations. Each utility will tell the Commission which weather station will cover which location (compliance filing).

5. With an eye to the situation with Idaho Power and the possibility that the moratorium could potentially cover weeks or months at a time, staff proposes that utilities be exempt from the winter moratorium if they offer an option to certain at-risk customers where they can elect not to have their service disconnected during the winter. This is essentially the “Cold Weather Program” that Idaho Power already offers to its customers, with a few tweaks. It is staff’s intent that this same option would be available to all 6 of the regulated utilities.

6. With these thresholds and time frames embedded in the administrative rule, we think a tariff filing would not be necessary. The only filing required would be a compliance filing denoting the weather station for each locality.

Please provide me your informal feedback on each point and the proposed language in general by email no later than November 23rd. Your comments do not need to be filed in the docket. If I receive negative feedback, the next step will be to schedule a workshop for discussion of these points and the draft.

Thanks,

Phil Boyle

Oregon PUC