



November 23, 2016

Public Utility Commission of Oregon
Attn: Filing Center
201 High St SE
PO Box 1088
Salem OR 97308-1088

RE: AR 601, CNGC Informal Comments on the Draft Severe Weather Moratorium Rule

In response to the November 9, 2016, email from the Public Utility Commission of Oregon (OPUC) to participants in AR 601, the Commission's Severe Weather Moratorium Rulemaking, Cascade Natural Gas Corporation (Cascade or Company) provides the following comments on the draft severe weather moratorium rule. Cascade could comply with the rule as drafted, but the Company thinks the rule could be improved, and has questions and comments. As requested in the OPUC email soliciting comments, Cascade provides feedback on each section of the draft rule, which is below in bolded text followed by Cascade's comments.

Severe Weather Moratorium on Involuntary Disconnections

- (1) Except as set forth in section (6) of this rule, an energy utility shall implement a moratorium on the disconnection of residential service when a daily high temperature of less than 32 degrees is forecast by the National Weather Service.**

In spite of requesting in prior comments that the threshold temperature be 25 degrees F, Cascade can comply with this as drafted. Using the National Weather Station is fine as each medium sized town Cascade serves has a nearby weather station.

Also, Cascade suggests that the language in this section be revised so that the rule is limited to involuntary disconnections for nonpayment. Cascade suggest the following edits in italicized text: "Except as set forth in section (6) of this rule, an energy utility shall implement a moratorium on the *involuntary* disconnection of residential service *for nonpayment*." The Company believes this additional language is necessary to clarify that this moratorium is not extended to disconnections related to theft of service or safety concerns.

- (2) An electric utility shall implement a moratorium on the disconnection of residential service when a local Heat Advisory is issued by the National Weather Service.**

Cascade has no comment as this would not be applicable to gas utilities.

- (3) An energy utility required to implement a moratorium under section (1) or (2) of this rule shall implement the moratorium for a period not less than 24 hours.**

Cascade's preference is that the requirement be for one full calendar day rather than 24 hours. 24 hours introduces complexity to compliance. If the Company were to call a moratorium after 8 a.m., due to discretion, would the moratorium need to extend 24 hours? If the utility were to use a forecast from the night before when it is able to stop the nightly batching of the disconnect orders, would the 24-hour period start the evening before? It would be simpler from a compliance perspective to call a moratorium for a specific day and once called, have it effective for the whole calendar day.

- (4) An energy utility shall base the need for a moratorium on data available from the nearest National Weather Service reporting station and need only apply a moratorium to the area covered by that reporting station. The energy utility shall obtain the required forecast data no later than 8:00 a.m. each business day.**

Cascade has no problem with this as the Company interprets it. Cascade believes this section as drafted would allow the Company to call a moratorium the evening before, as it would be no later than 8 a.m. on the day subject to the moratorium. Cascade believes it would be wise to retain the ability to use forecasts from the prior evening so that utilities could either stop nightly batching of disconnect orders or automate weather as a factor into the batching process. But this also raises another compliance question: if the Company does not call a moratorium based on a forecast the night before and the weather is colder than 32 degrees the next morning before 8 a.m., would the Company need to call a moratorium that next morning? If so, then it would imply less flexibility in the phrase "no later than 8:00 a.m." than initially assumed. Cascade's intent with this questioning is to ensure compliance is understood.

- (5) Each energy utility shall make an initial filing with the Commission to designate a weather reporting station for each locality in the utility's service area, and shall update its designations as necessary with a supplemental filing.**

This is fine as drafted.

- (6) If an energy utility implements a winter protection program under which a household with a child, an elderly person, or a medical certificate holder may voluntarily participate if the customer is unable to pay a utility bill and be protected from service disconnection between December 15 through March 15 of the calendar year, the requirements of section (1) of this rule shall not apply.**

Cascade would prefer that the Commission not introduce winter protection plans into the rule. This is a new concept introduced by Idaho Power as something they offer because it is required in Idaho; this was not discussed by all parties as something that might be adopted in to the rule as an option. Had Cascade known that it might be included in the rule, the Company would have provided comments on it. Cascade's experience in Idaho has proved

that the declaration process for qualifying as “at-risk” is difficult to administer and leads to customer deception. Cascade also believe a customer who is under the protection of a voluntary seasonal moratorium should be required to provide proof that he/she has received energy assistance. Extending protection of disconnection to customers who can pay harms all other customers. In areas where seasonal moratoriums are offered or required, customers who understand the time value of money take advantage of them, not just customers who cannot pay. Cascade thinks this idea has been introduced without consideration from all parties for the boundaries or requirements such a program should have.

If this option is retained, and again, Cascade strongly requests that is not retained, it would make sense to use words that better define the option besides “winter protection program.” A suggestion is “voluntary winter moratorium”. “Winter protection program” is not a defined term in the OARs but is borrowed from other states without the benefit of more context.

Cascade appreciates the opportunity to provide comment on this draft rule and looks forward to continued discussion in this docket.

If you have any questions about this filing, please contact Jennifer Gross at (509)734-4465.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Parvinen", with a long horizontal flourish extending to the right.

Mike Parvinen
Director, Regulatory Affairs