



Oregon Citizens' Utility Board

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February 2, 2017

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
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Salem OR 97308-1088

Re: AR 601 Severe Weather Moratorium; CUB Comments on Final Draft Rules

CUB appreciates Staff's substantial preparation and diligent work to devise, and now finalize, timely rules to protect customers from involuntary service disconnections under severe weather conditions.

Temperatures this winter, in all parts of the State, beginning in December of last year, have routinely hovered at or below freezing.

This cold stretch, as much or more than any in time in recent memory, has been tough on residential customers – renters and homeowner alike – but especially on those vulnerable and low-income families most at risk of service disconnection.

On January 11, Governor Kate Brown declared a State of Emergency after fielding requests from Crook and Malheur County Officials, and under advisement from the State's Office of Emergency Management. The dangerous build-up of snow and ice forced many families to remain homebound for lengthy spells; collapsed roofs followed, causing significant damages – often to housing stock already in need of repair.

Clear rules to prevent involuntary service disconnections in the case of severe weather – the very weather that has dominated the winter of 2016-2017 – cannot come soon enough. Rulemaking for service disconnection reporting can also not come soon enough.

Due to the consistent severity of this winter's weather, CUB has very real concerns about both the scope of involuntary service disconnections, but also disconnections this spring due to arrearages.

Regarding proposed changes to the rules:

1. CUB disagrees with NW Natural's proposed change to Section (3). The moratorium should remain in effect for no less than 24 hours – not “at least through the start of the next business day.”
2. CUB agrees with PGE's proposed change to Section (6), that in complying with the requirements, an energy utility should also “notify the Commission's Consumer Services Section upon choosing a different weather reporting service.”

3. CUB recommends the following change to Section (7) "...be protected from service disconnection from December 1 through March ~~4~~31..."

In summary, CUB applauds Staff's commitment, and the participation on the part of the energy utilities during AR 601 Rulemaking, and we look forward their continued participation on AR 602 Rulemaking into Disconnection Reports.

Respectfully,

Samuel Pastrick
Consumer Advocate
Oregon Citizens' Utility Board