

Affiliated Tribes of Northwest Indians  
AirWorks, Inc.  
Alaska Housing Finance Corporation  
Alliance to Save Energy  
Allumia  
Alternative Energy Resources Organization  
American Rivers  
Backbone Campaign  
Beneficial State Bank  
BlueGreen Alliance  
Bonneville Environmental Foundation  
Centerstone  
Citizens' Utility Board of Oregon  
City of Ashland  
City of Seattle Office of Sustainability & Environment  
Climate Solutions  
Community Action Center of Whitman County  
Community Action Partnership Assoc. of Idaho  
Community Action Partnership of Oregon  
Earth and Spirit Council  
Earth Ministry  
Ecova  
eFormative Options  
Emerald People's Utility District  
Energy Savvy  
Energy Trust of Oregon  
Environment Oregon  
Environment Washington  
EQL Energy  
Forth  
Home Performance Guild of Oregon  
Home Performance Washington  
Housing and Comm. Services Agency of Lane Co.  
Human Resources Council, District XI  
Idaho Clean Energy Association  
Idaho Conservation League  
Idaho Rivers United  
Interfaith Network for Earth Concerns  
League of Women Voters Idaho  
League of Women Voters Oregon  
League of Women Voters Washington  
Montana Audubon  
Montana Environmental Information Center  
Montana Renewable Energy Association  
Montana River Action  
National Center for Appropriate Technology  
National Grid  
Natural Resources Defense Council  
New Buildings Institute  
Northern Plains Resource Council  
Northwest Energy Efficiency Council  
NW Natural  
OneEnergy Renewables  
Opower  
Opportunities Industrialization Center of WA  
Opportunity Council  
Oregon Energy Fund  
Oregon Environmental Council  
OSEIA  
Pacific Energy Innovation Association  
Pacific NW Regional Council of Carpenters  
Portland Energy Conservation Inc.  
Portland General Electric  
Puget Sound Advocates for Retired Action  
Puget Sound Cooperative Credit Union  
Puget Sound Energy  
Renewable Northwest  
Save Our Wild Salmon  
Seattle City Light  
Seinergy  
Sierra Club  
Sierra Club, Idaho Chapter  
Sierra Club, Montana Chapter  
Sierra Club, Washington Chapter  
Small Business Utility Advocates  
Smart Grid Northwest  
Snake River Alliance  
Solar Installers of Washington  
Solar Oregon  
Solar Washington  
South Central Community Action Partnership  
Southeast Idaho Community Action Partners  
Spark Northwest  
Spokane Neighborhood Action Partners  
Sustainable Connections  
The Climate Trust  
The Energy Project  
UCONS, LLC  
Union Of Concerned Scientists  
United Steelworkers of America, District 12  
US Green Building Council, Idaho Chapter  
Washington Environmental Council  
Washington Local Energy Alliance  
Washington State Department of Commerce  
Washington State University Energy Program  
YMCA Earth Service Corps



**NW Energy Coalition**  
for a clean and affordable energy future

October 2, 2017

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem OR 97308-1088

**Re: AR 602 Involuntary Service Disconnection Reporting Requirements for Energy Utilities; Northwest Energy Coalition Follow-Up Comments**

The Northwest Energy Coalition thanks the Commission and Staff for their consideration and effort in reviewing initial comments on AR 602, and for acknowledging the need to understand disparities among demographic groups with regard to involuntary disconnections.

**Geographic Reporting Area**

The Coalition hopes respectfully to raise a concern. Combining zip codes into greater geographic areas will impede efforts to better understand potential disparities as it will be more difficult to achieve granularity when aligning disconnection reporting data with census data. The Coalition acknowledges the reporting challenges for utilities who cover many zip codes and also the potential for unwieldy reports, but if the interest of this docket is to better understand involuntary disconnection patterns in Oregon, specificity is paramount.