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COMPANY NAME: Portland General Electric

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Send confidential information, voluminous reports, or energy utility Results of Operations Reports to PUC Filing Center, PO Box 1088, Salem, OR 97308-1088 or by delivery service to 3930 Fairview Industrial Drive SE, Salem, OR 97302.



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204
PortlandGeneral.com

October 30, 2015

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

RE: HB 2599 PGE Reporting on Company Processes Relating to Delinquent Accounts

Pursuant to House Bill (HB) 2599 signed into law by Governor Brown on June 11, 2015, Portland General Electric Company ("PGE"), a utility as defined in ORS 757.005, is directed to file a report by November 1, 2015 on PGE's processes that mitigate, for nonpayment of a delinquent account, the termination of electric service to a residential customer belonging to a protected class if the termination would occur: (a) During the heating season; (b) On any date for which the National Weather Service forecasts that the temperature of a location both within the state and the service territory of the utility will exceed 100 degrees Fahrenheit for a period of 12 or more hours; or (c) On any date for which the National Weather Service forecasts that the temperature of a location both within the state and the service territory of the utility will be less than 32 degrees Fahrenheit for a period of 12 or more hours.

We first address the statement in HB 2599, which states:

"...the termination of electric (or natural gas) service to a residential customer *belonging to a protected class* (emphasis added) if the termination would occur..."

For a multitude of reasons, including customer privacy issues, PGE does not collect or track data that identifies customers whose households would be included in the protected class defined in the bill. Therefore, our processes (described below) that mitigate termination of electric service for nonpayment are generally applicable to all customer accounts that may be subject to disconnection due to customer nonpayment. PGE's collection practices are governed by Division 21 Rules of Oregon Administrative Rules (OAR).

We now describe PGE's established collection process as it relates to all customers whether it is a heating or cooling season:

PGE services are rendered on a credit basis, meaning payment for services is generally not made until after the electricity has been used. Customer bills are due approximately

15 days after bill presentment, as prescribed in OAR 860-021-0125. If an account balance remains unpaid and the arrearage balance is more than \$100 (\$125 if not on a payment plan), PGE mails a 15-day reminder notice approximately nine days after the bill's due date. PGE's automated call system also attempts to contact the customer. Following the 15-day reminder notice, a new bill is created which contains an overdue reminder.

If no payment is received, or if no payment arrangement is made, the notification process is repeated 10 days later with a 5-day disconnect notice mailed to the customer and a second series of attempts made to contact the customer by phone. Three business days prior to the "must act-by date" listed on the 5-day notice, a disconnection service order is created. If a payment is received, or if payment arrangements are made prior to the service order being worked by Field Services personnel, PGE will cancel the disconnect service order. Prior to initiating any disconnect work order, PGE's Field Services reviews all accounts that are subject to disconnect before acting on the work order.

PGE offers Time Payment Arrangements¹ and other payment extensions in an effort to help customers manage their accounts. Further, with the implementation of PGE's self-service automated payment extensions, customers can extend their payment dates, within certain limits, to help with their immediate needs and to mitigate the risk of disconnection of service. In 2014, more than 250,000 such extensions were granted by Customer Service Representatives (CSRs) or through the self-service option, thereby alleviating the disconnection of service.

If a customer expresses an inability to make payment, the customer is referred to an energy assistance agency for help. If the Company receives an energy assistance commitment from an agency that satisfies the minimum to avoid disconnection of service, PGE stops the disconnection activity on the account.

PGE works closely with these agencies to provide energy bill assistance to customers. In 2014, PGE residential and non-residential customers paid approximately \$11.7 million to Oregon Energy Assistance Programs (OEAP) through PGE's Low Income Assistance Charge (PGE Tariff Schedule 115).

Note: Medical Certificate accounts are not part of the standard disconnect process and are removed. Medical Certificate accounts are managed exclusively by Medical Certificate specialists in reviewing, negotiating payment for new or existing TPA plans, and aiding in obtaining available energy assistance funding. Prior to the disconnection of service of a Medical Certificate account, PGE notifies the Oregon Public Utility Commission (OPUC) Consumer Services Section in advance of any potential disconnection of service for non-payment as specified in OAR 860-021-0410.

¹ OAR 860-021-0415 provides a customer a choice between two plans: levelized or an equal-pay arrearage plan. Each plan requires a minimum down payment with the remaining balance to be paid off in equal installments over the following 11 months.

Established Inclement Weather Disconnect Process:

PGE applies consistent practices regarding disconnections during times of extreme weather. PGE does not disconnect service when a severe weather alert has been issued by the National Weather Service for extreme temperatures (i.e., a heat advisory or winter storm warning). Regardless of the county or counties in which the alert has been issued, PGE applies consistent practices regarding disconnections to all its service territory. For example, if the extreme weather alert is issued only for Salem, Oregon, PGE suspends all disconnections in all its service territory for the duration of that advisory. Once the extreme weather advisory has been lifted, PGE closely monitors and assesses current conditions before resuming any disconnection activity.

PGE does not disconnect service for credit related purposes on Fridays, holidays, OPUC designated Holidays or during inclement weather, as discussed. In conclusion, disconnection of service is a collection effort of last resort and an activity PGE does not take lightly.

Consumer Services Request for Additional Information:

1. Monthly breakdown for calendar years 2013, 2014 and YTD 2015 of the number of disconnections for:
 - a. Non-payment of a delinquent bill
 - b. Non-payment of a deposit or deposit installment
 - c. Failure to abide by terms of a TPA

Response:

Attachment A provides the detail for accounts disconnected for non-payment during the calendar years of 2013, 2014 and YTD 2015. Please refer to the tab "Disconnections" in Attachment A for this detail. Note: as a general practice, PGE does not disconnect specifically for a past due deposit installment. If, in addition to a past due light and power (L&P) balance that a deposit installment is also delinquent, disconnection of service is subject to those unpaid amounts. Additionally, total disconnect counts in the table include accounts where an unpaid TPA installment may have been part of the past due amount.

2. If possible, this information should be further broken down by group to include:
 - a. LIHEAP/OEAP recipients
 - b. Emergency Medical Certificate holders
 - c. Other customers who are not LIHEAP/OEAP recipients

Response:

As a general practice, PGE does not track accounts where service was disconnected and the customer may have received agency funding. However, for the purpose of this report, substantial resources and time were allocated in order to provide this detail. Please refer to tabs "LIHEAP-OEAP" and "Non-LIHEAP-OEAP" in Attachment A for this detail. Medical Certificate detail is included.

And if the data is available, by:

- d. Household income
- e. Senior status

Response:

As mentioned previously in this report, PGE does not collect or track data that identifies households as a protected class as defined in HB 2599, nor does PGE collect or track data that identifies senior status, therefore this information is not available to provide.

3. The report should also show (by month) the number of customer's 60-days in arrears and total dollars 60-days in arrears.

Response:

Attachment A provides 60-day arrearage detail for the calendar years 2013, 2014 and YTD 2015. Please refer to tab "Arrears" for this detail.

If you have any questions about this report, please contact Terri Bowman (503) 464-8854.

Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,



Karla Wenzel
Manager, Pricing and Tariffs

Enclosures

c.c. Phil Boyle, OPUC

House Bill (HB) 2599
Utility Required Reporting

Attachment A

Consumer Services Request
for Additional Information

House Bill (HB) 2599
Utility Required Reporting

Attachment A

Consumer Services Request
for Additional Information

Disconnections by Month (RESIDENTIAL)

1.) Monthly Breakdown for calendar years 2013, 2014, and YTD 2015 of the number of disconnections for:

- A) Non-Payment of Delinquent Bill
- B) Non-Payment of a deposit or deposit installment²
- C) Failure to abide by the terms of a TPA (Time Payment Agreement) ¹

2.) If possible, this information should be further broken down by group to include:

- B) B. Emergency Medical Certificate Holders ⁴

(A) Residential Disconnection for Non-Payment of Delinquent Bill	Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	2015	Yes	380	44	43	64	34	37	32	35	33	58			
	2015	No	21,595	2,583	2,685	2,613	2,920	2,198	2,152	1,790	2,308	2,346			
	2015	Total	21,975	2,627	2,728	2,677	2,954	2,235	2,184	1,825	2,341	2,404	N/A	N/A	N/A
Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
2014	Yes	488	63	39	52	63	48	43	32	23	42	44	12	27	
2014	No	27,942	2,860	2,198	3,242	3,562	2,921	2,939	2,083	1,600	1,999	2,351	796	1,391	
2014	Total	28,430	2,923	2,237	3,294	3,625	2,969	2,982	2,115	1,623	2,041	2,395	808	1,418	
Year	Medcert	Total	JAN ³	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
2013	Yes	541	50	40	64	62	55	55	49	47	28	54	28	9	
2013	No	34,513	4,047	3,202	3,809	3,875	3,166	2,692	3,025	2,554	2,376	3,182	1,788	797	
2013	Total	35,054	4,097	3,242	3,873	3,937	3,221	2,747	3,074	2,601	2,404	3,236	1,816	806	
(B) Residential Disconnection for Non-Payment of a Deposit or Deposit Installment	Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	2015	Yes	0	0	0	0	0	0	0	0	0	0	0	0	0
	2015	No	77	11	13	5	6	8	11	6	7	10			
	2015	Total	77	11	13	5	6	8	11	6	7	10	0	0	0
Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
2014	Yes	0	0	0	0	0	0	0	0	0	0	0	0	0	
2014	No	113	8	8	20	5	8	13	5	7	14	17	2	6	
2014	Total	113	8	8	20	5	8	13	5	7	14	17	2	6	
Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
2013	Yes	0	0	0	0	0	0	0	0	0	0	0	0	0	
2013	No	114	13	8	7	7	9	9	20	8	11	13	8	1	
2013	Total	114	13	8	7	7	9	9	20	8	11	13	8	1	

¹ The disconnect counts represent all disconnections where a past due TPA installment may have been part of the past due amount.

² These counts include accounts where a deposit payment was part of the past due amount and do not reflect accounts disconnected solely for non-payment of deposit. PGE does not disconnect specifically for non-payment of a deposit or deposit installment.

Disconnections by Month (RESIDENTIAL) - for accounts receiving either **LIHEAP** or **OEAP** assistance within the same calendar year²

2.) If possible, this information should be further broken down by group to include:

- A) Non-Payment of Delinquent Bill (above)¹
- B) Non-Payment of a deposit or deposit installment (below)²
- C) Failure to abide by the terms of a TPA³

A) Residential Disconnection for Non-Payment of Delinquent Bill	Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	2015	Yes	140	7	17	28	13	14	10	19	10	22			
	2015	No	4,085	487	484	429	605	371	450	349	483	427			
	2015	Total	4,225	494	501	457	618	385	460	368	493	449	N/A	N/A	N/A

Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
2014	Yes	208	32	16	22	23	19	18	20	8	18	20	3	9
2014	No	6,374	697	413	682	743	674	667	576	371	486	584	194	287
2014	Total	6,582	729	429	704	766	693	685	596	379	504	604	197	296

Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
2013	Yes	252	17	19	33	24	31	23	24	25	16	27	9	4
2013	No	8,769	634	766	987	1,072	899	727	916	723	627	824	415	179
2013	Total	9,021	651	785	1,020	1,096	930	750	940	748	643	851	424	183

B) Residential Disconnection for Non-Payment of a Deposit or Deposit Installment	Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	2015	Yes	0	0	0	0	0	0	0	0	0	0	0	0	0
	2015	No	19	2	5	0	0	2	2	3	2	3	0	0	0
	2015	Total	19	2	5	0	0	2	2	3	2	3	0	0	0

Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
2014	Yes	0	0	0	0	0	0	0	0	0	0	0	0	0
2014	No	34	3	4	5	2	3	4	3	1	2	5	1	1
2014	Total	34	3	4	5	2	3	4	3	1	2	5	1	1

Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
2013	Yes	0	0	0	0	0	0	0	0	0	0	0	0	0
2013	No	30	5	1	1	3	3	4	3	2	4	4	0	0
2013	Total	30	5	1	1	3	3	4	3	2	4	4	0	0

¹ These accounts are a subset of the counts shown on the tab "Disconnects". Accounts received either/both LIHEAP or OEAP funding during the calendar year shown, and were disconnected for the specified reason during the month shown. All instances of a disconnection are included here. Some customers were disconnected more than once during the specified year.

² *These counts include accounts where a deposit payment was part of the past due amount and do not reflect accounts disconnected solely for non-payment of deposit. PGE does not disconnect specifically for non-payment of a deposit or deposit installment.*

Disconnections by Month (RESIDENTIAL) - for accounts **NOT** receiving either **LIHEAP** or **OEAP** assistance within the same calen

2.) If possible, this information should be further broken down by group to include:

C) Other customers who are not LIHEAP/OEAP recipients

(A) Residential Disconnection for Non-Payment of Delinquent Bill	Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
	2015	Yes	240	37	26	36	21	23	22	16	23
	2015	No	17,510	2,096	2,201	2,184	2,315	1,827	1,702	1,441	1,825
	2015	Total	17,750	2,133	2,227	2,220	2,336	1,850	1,724	1,457	1,848
	Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
	2014	Yes	280	31	23	30	40	29	25	12	15
	2014	No	21,568	2,163	1,785	2,560	2,819	2,247	2,272	1,507	1,229
	2014	Total	21,848	2,194	1,808	2,590	2,859	2,276	2,297	1,519	1,244
	Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
	2013	Yes	289	33	21	31	38	24	32	25	22
	2013	No	25,744	3,413	2,436	2,822	2,803	2,267	1,965	2,109	1,831
	2013	Total	26,033	3,446	2,457	2,853	2,841	2,291	1,997	2,134	1,853

(B) Residential Disconnection for Non-Payment of a Deposit or Deposit Installment	Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
	2015	Yes	0	0	0	0	0	0	0	0	0
	2015	No	58	9	8	5	6	6	9	3	5
	2015	Total	58	9	8	5	6	6	9	3	5
	Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
	2014	Yes	0	0	0	0	0	0	0	0	0
	2014	No	79	5	4	15	3	5	9	2	6
	2014	Total	79	5	4	15	3	5	9	2	6
	Year	Medcert	Total	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG
	2013	Yes	0	0	0	0	0	0	0	0	0
	2013	No	84	8	7	6	4	6	5	17	6
	2013	Total	84	8	7	6	4	6	5	17	6

¹ These accounts are a subset of the counts shown on the tab "Disconnects".

dar year¹

SEP	OCT	NOV	DEC
36			
1,919			
1,955	N/A	N/A	N/A

SEP	OCT	NOV	DEC
24	24	9	18
1,513	1,767	602	1,104
1,537	1,791	611	1,122

SEP	OCT	NOV	DEC
12	27	19	5
1,749	2,358	1,373	618
1,761	2,385	1,392	623

SEP	OCT	NOV	DEC
0	0	0	0
7	0	0	0
7	0	0	0

SEP	OCT	NOV	DEC
0	0	0	0
12	12	1	5
12	12	1	5

SEP	OCT	NOV	DEC
0	0	0	0
7	9	8	1
7	9	8	1

Arrears balances aged 60 days or greater (RESIDENTIAL) ¹

A) Show (by month) the number of customers 60-days in arrears and total dollars 60-days in arrears.

(A) Residential Arrears Accounts with balances 60 days or more in arrears	Year	Over 60 days	Average	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
	2015	Accounts	15,565	16,101	12,112	12,385	13,343	17,811	17,717	16,041	17,776	16,800
	2015	Dollars	\$1,582,149	\$1,708,715	\$1,281,549	\$1,330,988	\$1,449,182	\$1,890,220	\$1,748,014	\$1,614,481	\$1,644,557	\$1,571,634
	2014	Accounts	14,667	13,301	11,781	10,833	9,982	14,239	15,915	13,082	17,166	15,861
	2014	Dollars	\$1,479,754	\$1,259,439	\$1,272,068	\$1,192,643	\$1,104,770	\$1,476,132	\$1,590,722	\$1,317,441	\$1,631,668	\$1,512,461
	2013	Accounts	12,735	9,061	7,797	7,112	8,361	10,449	14,846	13,555	15,017	16,843
	2013	Dollars	\$1,046,407	\$745,013	\$679,448	\$551,570	\$743,938	\$872,921	\$1,235,955	\$1,108,143	\$1,138,277	\$1,320,942

¹ PGE does track arrearage balances for Medical Certificate holders. Medical Certificate accounts are included in these numbers.

OCT	NOV	DEC
N/A	N/A	N/A
N/A	N/A	N/A

OCT	NOV	DEC
13,873	19,701	20,273
\$1,326,638	\$1,959,661	\$2,113,409

OCT	NOV	DEC
14,350	17,798	17,636
\$1,100,391	\$1,489,766	\$1,570,516