



Portland General Electric
121 SW Salmon Street · Portland, Ore. 97204

December 3, 2020

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

RE: Advice No. 20-44, Rule E, Establishing Credit / Treatment of Deposits related to the Effects of the COVID-19 Pandemic on Utility Customers

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes 757.205 and 757.210, and Oregon Administrative Rule (OAR) 860-022-0025, for filing proposed tariff sheets associated with Tariff P.U.C. No. 18, with a requested effective date of **January 1, 2021**:

Second Revision of Sheet No. E-2
Second Revision of Sheet No. E-3
Third Revision of Sheet No. E-5

At its November 3, 2020 public meeting, the Public Utility Commission of Oregon adopted Staff's recommendation in Docket No. UM 2114, Investigation into the Effects of the COVID-19 Pandemic on Utility Customers. On November 5, 2020 the Commission issued Order No. 20-401 in Docket No. UM 2114, Investigation into the Effects of the COVID-19 Pandemic on Utility Customers formally approving Staff's recommendation.

The purpose of this filing is to update PGE's Rule E Establishing Credit / Treatment of Deposits pursuant to the outline in the Staff Report approved by Order 20-401 included a recommendation that the Commission approve the Stipulated Agreement on the Effects of COVID-19 Pandemic on Energy Utility Customers.

PGE added footnotes referencing that the Company will waive new deposit requirements associated with late or nonpayment, arrearages, or credit related issues for new or existing residential customers, through October 1, 2022 as outlined in OPUC Order No. 20-401. Also, the Company will not apply service disconnection and reconnection fees to residential customers until October 1, 2022. In addition, the Company will not accrue and collect late payment fees, interest, and penalties for all residential customers retroactive to the date of the start of the Company's disconnect moratorium and through October 1, 2022 as outlined in OPUC Order No. 20-401.

To satisfy the requirements of OAR 860-022-0025, PGE responds as follows:

The changes do not increase, decrease, otherwise change existing rates, or impact revenues. The proposed updates to Rule E, Establishing Credit / Treatment of Deposits related to the Effects of the COVID-19 Pandemic on Utility Customers provide additional protections for PGE customers during this time of need and hardship.

Due to the requested effective date and the less than 30-day notice, PGE is also submitting an application requesting a waiver of legal statutory notice, pursuant to ORS 757.220 and OAR 860-022-0020.

Please direct questions to Mary Widman at (503) 464-8223. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing and Tariffs

Enclosures

- 3) A letter from the Applicant's employer, income provider or authorized representative verifying the Applicant's ability to pay. A letter from an employer must state that the Applicant is currently employed and has been employed the entire 12 months prior to the application, and must contain a telephone number for an authorized representative of the employer. The Company must be able to verify the Applicant's employment; or
- 4) Payment of a Deposit as detailed below in Section C.

C. **Residential Deposit Requirements**⁽¹⁾

(C)

In general, the Commission Credit Rules require that deposits be equal to two months' estimated billings (1/6 of the estimated annual usage) at the service address. When a deposit is required, the charges specified in Schedule 310 may apply. A deposit is required if any of the following is true about the Applicant or Customer:

- 1) Does not establish credit as set forth in Subsections (1) through (3) of Section B above;
- 2) Received equivalent Electricity Service from the Company or the same type of utility service from an Oregon-regulated utility within the preceding 24 months and, at the time service was terminated, the Customer owed an account balance that was not paid according to its terms. This does not apply to Customers who registered a dispute with the Commission within 60 days after service terminated and who promptly paid all undisputed or adjudicated amounts;
- 3) Was previously terminated for Theft of Service by the Company or any Oregon-regulated utility or was otherwise found to have tampered with the meter, other utility facilities or diverted utility service;
- 4) Was previously exempted from paying a deposit based upon false information given at the time of application; or
- 5) Moves and the anticipated bill at the new residence will be at least 20% greater than that upon which any current deposit was based.

(1) The Company will waive new deposit requirements associated with late or nonpayment, arrearages, or credit related issues for new or existing residential customers, through October 1, 2022 as outlined in OPUC Order No. 20-401.

(N)
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(N)

D. **Timing and Payment of Residential Deposit** ⁽¹⁾

(C)

An Applicant or Customer who is required to pay a deposit or additional deposit may:

- 1) Pay the deposit in full prior to receiving service;
- 2) Enter into an agreement to pay the deposit in three installments, except where a deposit is required to reconnect service after disconnection for nonpayment (OAR 860-021-0335), in which case the whole deposit is due prior to reconnection; or
- 3) Provide a letter of guaranty.

If the Applicant or Customer chooses to enter into a deposit installment agreement they must do so within five business days ⁽¹⁾ from the date of notice from the Company that a deposit is required. Except for the last payment, installments must be the greater of \$30 or 1/3 of the deposit. The Applicant or Customer must pay the first installment immediately. The remaining installments will be due 30 and 60 days after the first installment payment. If a Customer has an existing deposit on file with the Company, and an additional amount is being added to the deposit due, any additional installment payment(s) will be adjusted to include the additional deposit; however, two payments will not be required within the same 30 day period.

If a Customer fails to abide by the terms of a deposit installment agreement, the Company may disconnect service after making a good-faith effort to contact the Customer in person or by mailing a notice no less than six business days before disconnection. Should disconnection for nonpayment of a deposit occur, the Customer is required to pay: the full amount of the unpaid deposit balance, any applicable Reconnection charge, Late Payment Charge, and 1/2 of any past due amount before service is restored ⁽²⁾. The balance of the past due amount is to be paid within 30 days of the date service is restored. A Customer may continue with an existing time payment agreement by paying all past-due installments along with the full deposit and other applicable charges [OAR 860-21-0205(7)].

(C)

(1) The Company will waive new deposit requirements associated with late or nonpayment, arrearages, or credit related issues for new or existing residential customers, through October 1, 2022 as outlined in OPUC Order No. 20-401

(2) The Company will not apply service disconnection and reconnection fees to residential customers until October 1, 2022. In addition, the Company will not accrue and collect late payment fees, interest, and penalties for all residential customers retroactive to the date of the start of the utility's disconnect moratorium and through October 1, 2022 as outlined in OPUC Order No. 20-401.

(N)

(N)

F. **Treatment and Refund of Residential Deposits** ⁽¹⁾

(C)

The Company will furnish a receipt upon payment of deposit and will hold the deposit until credit is satisfactorily established or re-established. For the purposes of this section of the rule, credit is considered to be established or re-established if, at the end of 12 months after a deposit is paid in full:

- 1) The account is current;
- 2) The Customer has not been issued more than two 5 day disconnection notices during the previous 12 months; and
- 3) The Customer was not disconnected for nonpayment, meter tampering, or diversion of electricity service during the previous 12 months.

In the event the Customer moves to a new address within the Company's Service Territory and the Company is holding a deposit in accordance with this rule, the deposit, plus accrued interest, will be transferred to the new account.

G. **Interest Accrual**

Deposits will accrue interest at a rate prescribed by order of the Commission and set forth in Schedule 300. If a deposit is held beyond 12 months, accrued interest will be paid by a credit to the Customer's account on the next bill for service following the anniversary of the accrual date. Interest will be prorated on deposits held by the Company for less than a full 12 months.

H. **Delinquent Accounts**

When residential service is voluntarily closed, the Company will refund a Customer deposit with interest accrued at the rate as listed in Schedule 300, except that such refund will first be applied to reduce or eliminate any unpaid balance(s) on any other Customer account(s).

The Company is under no obligation to draw on deposits to cure delinquency of an active Customer account.

(1) The Company will waive new deposit requirements associated with late or nonpayment, arrearages, or credit related issues for new or existing residential customers, through October 1, 2022 as outlined in OPUC Order No. 20-401.

(N)
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(N)

LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at puc.filingcenter@state.or.us.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF Portland General Electric Company _____ (UTILITY COMPANY)))))	UTILITY L.S.N. APPLICATION NO. _____ (LEAVE BLANK)
TO WAIVE STATUTORY NOTICE.		

NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.

1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)
 The purpose of this filing is to update PGE's Rule E Establishing Credit / Treatment of Deposits pursuant to the outline in the Staff Report approved by Order 20-401 included a recommendation that the Commission approve the Stipulated Agreement on the Effects of COVID-19 Pandemic on Energy Utility Customers.

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)
 First Revision of Sheet No. E-2
 First Revision of Sheet No. E-3
 Second Revision of Sheet No. E-5

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)
 Second Revision of Sheet No. E-2
 Second Revision of Sheet No. E-3
 Third Revision of Sheet No. E-5

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:
 A Waiver of Statutory Notice is requested due to the requested effective date of January 1, 2021

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): January 1, 2021

. AUTHORIZED SIGNATURE	TITLE \\s\ Robert Macfarlane Manager, Pricing & Tariffs	DATE December 3, 2020
PUC USE ONLY		
<input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE	
AUTHORIZED SIGNATURE	DATE	