



# Oregon

Theodore R. Kulongoski, Governor

## Public Utility Commission

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October 26, 2005

OREGON PUBLIC UTILITY COMMISSION  
ATTENTION: FILING CENTER  
PO BOX 2148  
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RE: **OPUC Docket No. AR 500** - In the Matter of a Rulemaking to Amend  
OARs 860-021-0120, Meter Readings and Bill Forms, and 860-021-0405, Notice of  
Pending Disconnection of Residential Electric or Gas Utility Service.

Enclosed for filing in the above-captioned docket is the Public Utility Commission's AR 500 Staff Comments presented at the Rulemaking Hearing today, October 26, 2005. This document is being filed by electronic mail with the PUC Filing Center. As a courtesy, the interested persons identified on the Commission's service list were also provided an electronic copy of these documents.

*/s/ Diane Davis*

Diane Davis  
Regulatory Operations Division  
Filing on Behalf of Public Utility Commission Staff  
(503) 378-4372

**Staff's Comments at AR 500 Hearing  
October 26, 2005**

Good afternoon. I'm Lisa Schwartz, representing staff.

This rulemaking came from the Commission's investigation into policies that promote advanced metering and communication technologies, UM 1188. In reviewing possible barriers to adopting these technologies, the energy utilities identified two rules that require changes to accommodate how the technologies work.

The AR 500 rulemaking addresses changes in how advanced meters are read, as well as the information they make available for customer bills. The rulemaking also revisits how energy utilities provide final notice to residential customers before disconnecting service.

There is general consensus on the proposed rule changes for meter readings and bill forms. However, there is disagreement about how to accommodate advanced metering and communication systems in rules for final disconnection notice for energy service.

That's in large part because of technology that provides remote disconnection and reconnection of service. Utilities may want to take advantage of this technology in combination with advanced metering and communications. Any requirement for a site visit for disconnection notice makes remote disconnection technology less cost-effective. And that may reduce the overall cost-effectiveness of advanced metering and communications – technology that the Commission would like to encourage.

Today, the Commission's rules require the utilities to go to the customer's home for final disconnection notice. If the utility is unable to get the customer or another

adult resident at the door, they leave a written notice in a conspicuous place. Unless payment arrangements are made at the time of that visit, service is disconnected then and there.

PGE requests that the Commission change the rule to eliminate site visits entirely where remote disconnection is installed. In that case, customers who do not respond to PGE's automated call by connecting to a customer service representative for payment arrangements, or who do not otherwise pay by the disconnection date, will be shut off remotely at that time.

Staff instead proposes that the Commission amend its rules to allow the utilities to make the final disconnection notice by telephone, so long as they make personal contact. That would avoid a site visit. However, if the utility is unable to make that personal contact, we recommend the utility be required to make a site visit as today.

PGE's proposed rules differ in part from staff's in the form of telephone call that would constitute personal contact and avoid a site visit. Staff proposes that there be a telephone conversation with the customer or another adult resident. An automated call alone would not meet the requirement – the customer would have to connect to a call center representative. Nor would a conversation with any adult associated with the residence other than the customer or another adult resident. We chose a high standard for making contact by telephone to help ensure a sufficient level of effort and communication with an appropriate individual.

However, staff offers an alternative for the Commission's consideration — allowing a telephone message from the utility to meet the final notification requirement, so long as the utility made numerous attempts at reaching the customer personally by phone. Under this alternative, a site visit would be required only if the utility is unable to leave a telephone message. That would

significantly reduce site visits. Staff recommends the Commission consider this alternative only where remote disconnection is in place. Otherwise, the utility has to manually disconnect at the residence anyway, so there's no saved site visit.

In making our recommendations, staff tried to balance competing interests. On the one hand, we want to foster innovative technology that can save customers money and provide improved service like fast reconnection. On the other hand, we want to provide as much opportunity as possible for consumers to avoid losing electric service.

I'd be glad to answer any questions you have. Also available for questions directed at staff are Clark Jackson, manager of Consumer Services, J.R. Gonzalez, manager of Safety and Reliability, and attorney Michael Weirich.