

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

AR 500

In the Matter of)
) Joint Comments of
) The Community Action Directors
Initiate a Rulemaking to Amend OARs) Of Oregon
860-021-0120, Meter Reading and Bill) &
Forms, and 860-021-0405, Notice of) The Citizens' Utility Board
Pending Disconnection of Residential) Of Oregon
Electric or Gas Utility Service.)
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_____)

The Community Action Directors of Oregon (CADO) and the Citizens' Utility Board of Oregon (CUB) submit the following written comments on behalf of customers who are served by electric and/or gas utilities regulated by this Commission and subject to the OARs in question. We have participated in the process that has resulted in the proposed rule changes, and look forward to further exploration of these matters. We wish to thank the Commission Staff who have moved this Docket forward in an expeditious and inclusive manner. Additionally, we would like to state that these comments should not be construed as support for the adoption of advanced metering infrastructure (AMI), including the features of remote customer disconnect and reconnect. While a potentially promising source of cost reduction and efficiency improvements, the benefits and cost effectiveness of AMI and the associated benefits to utility ratepayers – especially low-income ratepayers – will need to be demonstrated in future OPUC Dockets. At this time, no utility has offered evidence that demonstrates the prudence of costly investment in AMI.

Meter Reading and Bill Forms, OAR 860-021-0120

CADO and CUB support the proposed changes to OAR 860-021-0120 that are shown in Appendix A, pages 1 and 2, of the Staff Report dated September 2, 2005. As discussed in the report, there is general consensus among the parties on these changes.

Final Notice of Pending Disconnection of Residential Energy Service, OAR 860-021-0405

CADO and CUB support the recommendations of the Commission Staff, and the proposed changes to OAR 860-021-0405 that are shown in Appendix A, pages 3 and 4, of the September 2nd Staff Report. In short, we oppose eliminating the requirement for a site visit in cases of impending disconnection of utility service where the utility has not reached the customer or another adult at the residence by phone.

Staff's recommendation, in summary, retains the 15-day, and 5-day, written notice of proposed disconnection, and allows for the utility to make personal contact with the customer through a telephone conversation with that customer or another adult living at the customer's residence, instead of a site visit. Staff would require that a site visit, combined with a conspicuous notice of proposed disconnection, if such a personal contact is not made. A telephone message will not suffice.

PGE objects to maintaining any requirement for a site visit claiming that the benefits of remote customer disconnect and reconnect when combined with AMI justify the elimination of a required site visit for final disconnection of service. Additionally, PGE argues that Staff's recommendation to require a site visit when the above referenced

telephone conversation does not take place, reduces the cost effectiveness of remote disconnect and reconnect.

We recognize that requiring a final site visit may, in some circumstances, lead to a few costs being higher than they might be without such a requirement. However, from the vantage point of protecting the interests of utility customers, and in particular low-income customers, we find that the benefits of such a requirement outweigh the costs. Taken alone, the process of automatic customer disconnect and reconnect would remove the requirement of having the utility make two field visits to the affected customer's location in most cases. The elimination of these visits would lead to cost reductions. When taken in combination with the automated meter reading capabilities of AMI, the utility would also eliminate the need for an additional regular field visit to customer premises that have AMI capability. Given the magnitude of these potential savings we do not find the requirement for a single final site visit in the case of an impending disconnection when a utility representative has not spoken with an adult in the residence to discuss the situation and, possible remedies, to be onerous. In fact, if such a requirement becomes a source of major concern for the economics of the AMI program then it brings into question the overall cost effectiveness of the AMI investments in the first place.

There potentially are logical and valid reasons why it is difficult for utilities to contact adults at residences facing possible service disconnection. PGE's automated telephone calling system, which can place up to 27 calls to a customer's residence, and includes telephone numbers from the company's customer information system and information purchased from independent sources, reaches only $\frac{2}{3}$ of the customers called.

This means that $\frac{1}{3}$ of PGE's customers who are facing disconnection are not reached by telephone. There can be any number of reasons for this including, as Staff notes, that some customers lose phone service at the same time, or right before, they face utility disconnection. Additional reasons can include the customer working two jobs in an attempt to stay current with their bills, or the customer having changed telephone service and inadvertently neglecting to update their record with their utility. In any case, having $\frac{1}{3}$ of PGE's customers facing disconnection unreachable by telephone does not instill in us the confidence necessary to agree with the elimination of a final site visit and the display of a conspicuous disconnection notice. Further, as noted by the Staff, final site visits may identify a situation where it could be potentially unsafe to disconnect service – a situation that may be correlated with nonexistent telephone service.

It should also be noted that many low-income customers who face disconnection may not have telephone service at all. According to the Oregon Food Bank, which surveys Oregonians who receive emergency food boxes, 21% of the recipients of emergency food boxes do not have telephone service. The surveys also show that 39% of the recipients of emergency food boxes are behind in paying their utility bills. Rewriting the rules to allow for telephone notice of impending utility shut-off for families that do not have telephones is not a reasonable policy and should be rejected. Allowing for telephone notices, but requiring a site visit when telephone notice is not obtained is a much more reasonable policy.

We urge the Commission to adopt the Staff's recommendation of language changes to both OAR 860-021-0120 and OAR 860-021-0405.

Respectfully submitted this 26th day of October, 2005

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