



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

September 7, 2022

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

RE: AR 653, Formal Rulemaking Round 2 Comments from PGE on Field Collection Language within Division 21 of the Oregon Administrative Rules

Portland General Electric Company (PGE or “the Company”) submits final comments on OPUC Staff’s proposed modifications to OAR 860-021-0405(11) in the Notice of Proposed Rulemaking Hearings with Statement of Need, Fiscal Impact Statement, and Proposed Rules (“the Notice”) issued July 1, 2022. PGE continues to support Staff’s recommendation which allows the utility to determine its own policy on accepting payments at the door and asks for a minor modification to the draft language. This modification will better align expected impacts with the stated goal of providing customers sufficient time to make an in-person payment to avoid disconnection for non-payment:

If an energy utility has a policy to not allow collections at the door, the utility representative shall attempt to notify the customer of methods to pay the outstanding balance or a reasonable partial payment to prevent disconnection. **If the customer indicates they can make a payment**, the energy utility shall delay disconnection as determined by the utility and notify the customer in such case that they have a minimum of 24 hours for the customer to contact the energy utility and make adequate payments.

By adding the bolded language above, customers who indicate they will make a payment have an additional 24 hours to do so while not requiring an additional truck roll the following day for those who indicate they are unable to make a payment within that timeframe. This nuanced adjustment will help mitigate additional business costs that are not expected to provide customer benefits.

PGE would also like to provide clarification to verbal comments provided at the Special Public Meeting on September 1, 2022. PGE stated, “On average, we have ~9,000 monthly transactions via Western Union and CheckFreePay.” These are all residential and non-residential transactions via Western Union and CheckFreePay, including debit/credit card, check, etc., and not limited to cash transactions. Some of these customers are cash-based customers who are paying their bill, for free, at the hundreds of locations co-located with common retail destinations like Fred Meyer, Walmart, and

Winco throughout PGE's service territory. This volume also includes customers who pay their bill by the due date and doesn't necessarily mean they pay at those locations as an alternative to paying a field employee.

PGE appreciates the collaborative and thoughtful approach to this Rulemaking process and recognizes the challenge of developing rules across a range of utility service territories and business models.

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing & Tariffs

cc: AR 653 Service List