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April 1, 2022

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: AR 653/ UM 2114 - Second Round Joint Utility Response to Recommended Changes to Division 21 of the Oregon Administrative Rules

Dear Filing Center:

Avista Utilities, Cascade Natural Gas, Idaho Power Company, NW Natural, PacifiCorp d/b/a Pacific Power, and Portland General Electric Company (collectively “the Joint Utilities”) appreciate the balance struck by Public Utility Commission of Oregon (OPUC) Staff in their second iteration of proposed changes to Division 21 of the Oregon Administrative Rules (OAR), posted on March 23, 2022, in AR 653/UM 2114. The Joint Utilities support many of the revisions made to Staff’s initial proposal.

Detailed below, however, are a few elements under Collections Protections and Severe Weather Protections where the Joint Utilities continue to have concerns over Staff’s revised proposals or recommend changes to make Division 21 rules more efficient.

Collection Protections

Notice Communications

The Joint Utilities remain concerned with the proposed extension of the 15-day notice to a 20-day notice as a strategy to mitigate disconnections. As previously noted by Staff, the Joint Utilities guided by Division 21 rules currently all provide 38-66 days of notice to past-due customers before disconnecting service to ensure awareness and ample time for customers to make payments, arrangements for bill assistance, or contact the utility to develop a payment plan. The shortest of these notification windows is already six days beyond the OAR’s required 32 days, between the time of billing to when disconnection for nonpayment may occur. Given the length of the current notification windows (5.5 to 9.5 weeks), during which multiple contact efforts and assistance recommendations are made, an additional five days will not make a meaningful impact to customers struggling with past due balances. Our efforts should stay focused on bill affordability and arrearage assistance.

Time Payment Arrangements (TPAs)

The Joint Utilities appreciate the proposed additional language added to 860-021-0415(4) regarding the current practice of allowing longer TPAs when they are likely to be beneficial to a customer. As a result of this additional language, requiring the default duration of TPAs be extended to 18 months is unnecessary and can have negative consequences. TPAs longer than 12 months have not proven to be a better solution for all customers who are behind on their bills. Furthermore, TPAs with extended durations are more likely to be broken than shorter term arrangements. The Joint Utilities question the rationale for this proposed

change. In most cases, a 12-month TPA works well, and in the event a customer requests a TPA longer than 12 months, the Joint Utilities will continue to exercise their ability to be more flexible to meet the individualized needs of their customers. The Joint Utilities' Customer Service Representatives are committed to working with customers on a case-by-case basis to determine TPA terms that are most likely to result in the customer being successful in paying off their arrears.

The Joint Utilities reiterate the need for caution since making TPA renegotiations a requirement may delay some customers from reaching out for assistance and not result in the intended desired benefit. We recommend that the Joint Utilities continue to work with customers on a case-by-case basis.

Reconnection Fees

The Joint Utilities note that pole reconnect fees for electric utilities are not excluded under 860-021-0330(1) and that pole reconnections are usually performed when the utility does not have safe access to the meter. We recommend amending 860-021-0328(1)(d) to say "Sections (a),(b), and (c) above do not apply to After Hour Reconnects as described in OAR 860-021-0328(7)(b) or to pole reconnections."

Collecting Money at the Door

In its Division 21 Supplemental Information filing, Staff notes that, "[L]ead Staff firmly believes that collecting money at the door should be a utility decision and not required by the Commission." Based on Staff's belief and the Joint Utilities' collections practices, we find 860-021-0405(11) unnecessary and recommend it be removed.

Severe Weather Protections

As noted previously, the Joint Utilities are supportive of additional customer protections related to wildfires and severe weather situations. Following Staff's revised changes, we have only one point of concern in this section of the rules. A requirement for utilities to notify Staff when reconnects are not possible "due to adverse geographic and weather conditions" is limiting and, in our opinion, unnecessary because utilities will supply Staff with any reasons prohibiting utility personnel from moving forward with reconnections. The Joint Utilities are committed to alerting Staff of disruptions to reconnections and considering their response during such events.

We appreciate the opportunity to provide these comments and look forward to continued discussions at the April 6th workshop. PGE will provide an additional comment, separately filed.

Thank you,

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/s/ Connie Aschenbrenner
Rate Design Manager
Idaho Power Company

/s/ Shelley McCoy
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