



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204
PortlandGeneral.com

July 29, 2014

Via Email / US Mail
puc.filingcenter@state.or.us

OPUC Filing Center
3930 Fairview Industrial Dr. SE
PO Box 1088
Salem, OR 97308-1088

RE: UM 1657 PGE Reply Comments

Attention: Filing Center

Enclosed for filing in Docket No. UM 1657 are Portland General Electric's Reply Comments. This document is being filed by electronic mail with the Filing Center.

If you have any questions or require further information, please call Spenser Williams at (503) 464-7490. Please direct all formal correspondence and requests to the following email address: pge.opuc.filings@pgn.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick G. Hager". The signature is written in a cursive, somewhat stylized script.

Patrick G. Hager
Manager, Regulatory Affairs

PGH/sp

cc: UM 1657 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1657

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY

Annual Smart Grid Report

REPLY COMMENTS OF PORTLAND
GENERAL ELECTRIC

Portland General Electric (PGE) submits these reply comments in response to comments submitted by the Citizens' Utility Board of Oregon (CUB), Smart Grid Oregon (SGO), and Oregon Public Utility Commission (OPUC) Staff regarding PGE's 2014 Smart Grid Report (the "Report").

PGE acknowledges the future-facing comments it received from parties in this docket. We greatly appreciate the input we received on the Report and look forward to continued collaboration around future reports and Smart Grid development in Oregon.

Response to OPUC Comments

A. Low Income Customers

In Staff's comments, Staff requested that going forward it would be helpful for PGE "to provide specific information about how customers are being provided adequate notice and opportunities for payment prior to being remotely disconnected." Staff Comments at 4. PGE agrees, and accordingly, PGE provides an overview of PGE's current practices for providing customers with adequate notification and the options for payment of their utility bill, and how remote disconnection is used by PGE in the case of last resort as Appendix A. In addition, PGE will continue to research the benefits of a smart grid for low income consumers, while

considering ways the smart grid may cause inadvertent harm to low income customers and developing mitigation strategies to prevent such harm.

B. Energy Tracker

Staff also asked that PGE should be “clearer about the future plans for Energy Tracker and the costs and proposed benefits on those plans.” Staff Comments at 4. We note that PGE is in an information gathering stage concerning future enhancements to Energy Tracker for all customers. Our Customer Engagement Transformation (CET) is currently placing a heavy demand on internal resources. When CET is completed, enhancements to Energy Tracker will take priority and PGE will describe planned activities in future smart grid reporting.

C. HVAC Demand Response and Smart Thermostats

Staff further requested in future reports or updates regarding HVAC demand response and smart thermostats, to understand “a) more about what is being considered, b) what criteria PGE plans to use to determine whether or not it will pursue such a pilot in 2015, and c) if a pilot is pursued, specifically what will be tested and how success will be measured.” Staff Comments at 5. PGE is currently researching options for a pilot involving HVAC Demand Response and smart thermostats. As plans for the pilot are firmed up, we will provide the parameters under which the pilot will be conducted, and a set of metrics outlining what the pilot’s success would look like.

D. Analysis of Benefits

Staff believes the analysis of benefits for smart grid projects “...is not clearly presented. In most cases qualitative benefits are described, but not in a systematic and clear way.” Staff Comments at 5. Staff requests PGE provide both qualitative and quantitative analysis of benefits in a more clear and direct manner .To help improve the presentation and transparency of benefits

from smart grid projects, PGE is willing to hold workshops with OPUC Staff and other interested parties to develop parameters for presenting quantitative and qualitative cost-benefit analyses in line with Staff's expectations for future smart grid reports.

Conclusion

PGE believes the 2014 Smart Grid Report filing has met the requirements of Commission Order No. 12-158 established in Docket No. UM 1460 and requests the Commission accept this report. We greatly appreciate the input we have received on this report and look forward to continued collaboration around future reports and smart grid development in Oregon.

DATED this 29th day of July, 2014.

Respectfully submitted,



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Appendix A – Overview of PGE’s Current Practices Option for Payment and Disconnection Notification	
<p>Time payment arrangements</p> <p>a. Credit qualifications</p> <p>b. Number of months payments can be spread over</p> <p>c. Any flexibility or special considerations in practice?</p> <p>d. Other criteria or potential barriers</p>	<p>Plans are available for Residential Customers with active accounts, whose balances are past due. PGE offers two plans:</p> <ul style="list-style-type: none"> • Levelized Time Payment Agreement (TPA) – This plan combines a payment plan with PGE’s Equal pay plan. The monthly payment is equal to 1/12th of the total account balance plus equal installments of the estimated usage over 12 months • Arrearage Time Payment Agreement (TPA) – Under this plan, the monthly payment is equal to 1/12th of the total account balance plus the current actual monthly charges. <ul style="list-style-type: none"> • Past due account balance not already on a TPA • 15 or 5 day notice issued • Service is subject to disconnection <p>Under OAR 860-021-0415 [Time-Payment Agreements for Residential Electric and Gas Service (Nonmedical Certificate Customers)], the customer pays the down payment specified for the type of plan selected, and the remaining balance is spread over an 11-month period.</p> <p>PGE allows for more flexible payment arrangements for Emergency Medical Certificate Customers (up to 24 months), and will renegotiate those arrangements when a Medical Certificate Customer demonstrates financial hardship.</p> <p>In addition, special consideration is provided to Customers who cannot reasonably pay an overdue balance under the standard TPA terms. This could be due to the size of the accumulated balance, or if a rebilling, a debit adjustment or a balance transfer is made to the account.</p> <p>TPA’s are designed for light and power charges only.</p>

<p>Equal pay</p> <p>a. Requirements for participation</p> <p>b. Other parameters of program</p> <p>c. Generally how do you inform customers about these programs?</p>	<p>Equal Pay Budget Billing is available to all residential Customers not currently enrolled in a Time Payment Agreement.</p> <ul style="list-style-type: none"> • Account must be active • Account must be current, no past due balance • Customers may request an Equal Pay plan at any time • Equal Pay is an annual plan. The Customer must agree to remain on the plan for a full 12-month period • The basis for the monthly installment is as follows: <ul style="list-style-type: none"> ▪ If less than 12 months, 55% of the annual deposit is used as the basis of the initial monthly installment ▪ If more than 12 months, the monthly payment amount is based on 1/12 of the anticipated annual bill • PGE may adjust the monthly amount during the year if, due to significant changes in usage or other factors, the Equal Pay amount no longer accurately reflects the customer's actual usage. • The Customer must stay current on their account to remain on the plan • At the time of the annual review any remaining balance is included in estimating the equal payment for the following year. Tariff Rule (F)(5F) <p>Customer Service Representatives inform and educate customers about these programs. In addition, we promote Equal Pay in TV ads, print ads, radio spots, newsletters, brochures, bill messages, PGE web, and more.</p> <p>*NOTE: PGE also offers an Average Pay plan for Residential Customers with active accounts and no past due balances. Under this plan, the monthly payment amount will vary, because it is based on a rolling average of up to 12 months of energy usage. Unlike Equal Pay accounts, Average Pay accounts do not have an annual true-up. The true-up occurs when the customer stops participating in the plan.</p>
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<p>Disconnect notification protocol (phone calls, visits, door hangers, etc.)</p>	<p>Disconnect Notification protocols:</p> <ul style="list-style-type: none">• PGE issues a bill with a due date not less than 15 days after the bill is generated• <u>15 DAY NOTICE</u>: After the due date has passed, PGE issues and mails a written 15-Day Notice to the customer giving them at least 15 days to satisfy the charges before disconnection of service.<ul style="list-style-type: none">▪ Courtesy automated outbound phone calls are made to customers with 15-day notices advising them of a pending disconnection on the account. Customers have the option to pay at time of call or to call for payment arrangements. Messages are left on voicemail if available.▪ Disconnect notices include an insert translated into 5 languages re: Important notice.(OAR 860-021-0011)▪ Notices are printed in boldface type and contain information in clear language. The envelope of the notice reads “URGENT” in boldface on the front of the envelope and contains red stripes in the corner.▪ The notice provides the customer with information about TPA and Medical Certificate options.• <u>5 DAY NOTICE</u>: PGE issues and mails a written 5-Day Notice of Disconnection with the same due date as the 15-Day Notice.<ul style="list-style-type: none">▪ Courtesy automated outbound phone calls are made advising the customer of the pending disconnection and provides the customer with the option to pay at time of call or to call for payment arrangements. Messages are left on voicemail if available.▪ Disconnect notice includes an insert translated into 5 languages re: Important notice. (OAR 860-021-011).▪ PGE’s notice is printed in boldface type and contains information in clear language. The envelope of the notice reads “URGENT” in boldface on the front of the envelope and contains red stripes in the corner.• <u>CUSTOMER CONTACT</u>: PGE makes a good-faith effort to personally contact the customer or an adult at the residence either by telephone or at the door.<ul style="list-style-type: none">▪ For Medical Certificate customers and accounts with non-remote connect capability, a Field Connect Representative (FCR) attempts to contact the customer at the door. If the FCR is unable to speak with the customer, a door hanger is left at
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	<p>the residence to explain the visit and provide PGE contact numbers. When we make personal contact, our representative is empowered to accept reasonable partial payment of the overdue balance and/or to establish a TPA.</p> <ul style="list-style-type: none"> ▪ For accounts with remote disconnect/connect meters, we make required attempts to contact the customer by phone at least twice per day for three consecutive days prior to the proposed disconnection (OAR 860-021-0405). A \$20 field visit fee is assessed when arrangements /extensions are made at the door. • In addition to the notices described above, PGE also provides web customers courtesy disconnect notifications in the form of emails and/or text messages. These are “opt in” only options available to registered web users at portlandgeneral.com.
<p>Remote disconnect capability? If so, for who?</p>	<p>Approximately 1/3 of PGE’s residential meters have remote disconnect/connect capability. Customers with Medical Certificates on their accounts are exempt from remote disconnect. The majority of remote disconnect/connect meters are installed on non-owner occupied premise.</p>
<p>Criteria for reconnection</p>	<p>When service has been disconnected for non-payment it is PGE's business practice to update the records and provide a quote for the reconnection of service. PGE offers 3 reconnect options.</p> <ul style="list-style-type: none"> • Option 1: Total account balance + 1/3 deposit + reconnection fee; • Option 2: Total past due balance (as indicated on the notice) + 1/3 deposit + reconnection fee; • Option 3: One half of the account balance + 1/3 deposit + reconnection fee. The remaining balance is set up on a TPA, and the remaining deposit installments are due with the next two bills.
<p>Reconnection charges</p>	<p>Standard Reconnection:</p> <ul style="list-style-type: none"> • If service is reconnected at the Meter Base: \$30.00. • If service is reconnected at other than the Meter Base (e.g., pole, transformer): \$75.00. <p>After Hours Reconnection:</p> <ul style="list-style-type: none"> • If service is reconnected at the Meter Base: \$80.00. • If service is reconnected at other than the Meter Base: \$160.00. <p>See PGE Tariff, Schedule 300.</p>

<p>Any tenant/landlord disconnect considerations?</p>	<p>When we know there are “shared services” (e.g., well service serving multiple customers), PGE notifies all impacted customers with a duplicate 5-Day Disconnect Notice regarding the disconnection of electric service. The Company’s obligation is satisfied by serving the notice addressed to “Occupant” or “Tenant” located at the premises. The duplicate notice does not include any dollar amounts.</p> <p>When PGE records indicate that a residence is a master-metered multi-family dwelling (e.g., adult foster care homes), PGE notifies the OPUC Consumers Services Division at least five business days before disconnection of service. PGE uses all reasonable efforts to leave a door hanger for an occupant at the sub account (associated to the main account) advising them of the disconnect and alternate means available to them (OAR 860-021-0326).</p>
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S REPLY COMMENTS** to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. UM 1657.

DATED at Portland, Oregon, this 29th day of July, 2014.



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