

# MEMO



**DATE:** November 16, 2022

**TO:** Bryan Conway

**FROM:** Michael Dougherty

**SUBJECT: Portland General Electric (PGE) Second and Third Supplemental Filings to Advice No. 22-21, Compliance with Changes to Division 21 Rules in AR 653**

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Portland General Electric Company (PGE) filed its Second Supplemental Filing on Advice No. 22-21, Compliance with changes to Division 21 Rules in AR 653, on November 10, 2022.

PGE filed its Third Supplemental Filing on Advice No. 22-21, Compliance with changes to Division 21 Rules in AR 653, on November 16, 2022.

These filings are in compliance with Commission Order No. 22-353, dated September 29, 2022, which changed Chapter 860, Division 21 of the Oregon Administrative Rules; and Commission Order No. 22-384, dated October 20, 2022, which granted PGE a partial waiver through December 31, 2022, or upon written notice of intent to comply with the Commission's Consumer Services Section, whichever occurs first, of the amendments to the following administrative rules, effective September 30, 2022:

- OAR 860-021-0126(3) – Late Payment Charge
- OAR 860-021-0330(1)(2) – Reconnection Fee
- OAR 860-021-0420 – Field Visit Fee

By November 1, 2022, PGE completed system adjustments that allow for low-income customers to be automatically excluded from late payment and field visit fees pursuant to changes in the above OARs. PGE will be ready with the necessary adjustments for reconnection fees prior to November 14, 2022.

PGE submitted the Second Supplemental Filing requesting updates to PGE's Rules F and H under the same compliance advice filing previously submitted on October 3, 2022, with a requested effective date of November 23, 2022. PGE discussed the additional Rule changes with Staff to add language for low-income exclusions to Rules F and H and Staff supports PGE's Second Supplemental Filing. The following sheets were revised by PGE:

- Third Revision of Sheet No. F-9
- Second Revision of Sheet No. H-2
- Second Revision of Sheet No. H-3
- Fourth Revision of Sheet No. H-4
- Second Revision of Sheet No. H-5

- Original Sheet No. H-6

PGE submitted the Third Supplemental Filing requesting updates to PGE’s Rule H to clarify the language for Field Visit Charge from “within a 12-month window” to “within a rolling 12-month period” and Standard Reconnection charge from “within a 12-month window” to “in a calendar year.” PGE requested an effective date of November 23, 2022. Staff supports PGE’s Third Supplemental Filing. The following sheets were revised by PGE:

- Second Revision of Sheet No. H-2
- Second Revision of Sheet No. H-3
- Second Revision of Sheet No. H-5

To satisfy the requirements of OARs 860-022-0025(2), PGE provided the following response:

*The changes do not increase, decrease, otherwise change existing rates, or impact revenues.*

Staff has reviewed the changes and concludes that the changes are consistent with Commission Orders No. 22-353 and No. 22-384.

Staff recommends that an acknowledgement letter of both supplemental filings be sent to PGE with an effective date of November 23, 2022.