

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2120

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Effects of Covid-19
Pandemic on Water Utility Customers.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on November 3, 2020, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.¹



BY THE COMMISSION:

A handwritten signature in blue ink, appearing to read "Nolan Moser".

Nolan Moser
Chief Administrative Law Judge

¹ Corrections to Staff Report are as follows:

Page 4(Paragraph 16 incorrect; paragraph 12 correct):

Rulemaking on Reporting Requirements

Although the reporting condition above applies to the water utilities that are parties to the Stipulated Agreement, Staff recommends that all Class A and B water utilities be required to adhere to the temporary reporting requirements in paragraph 16 12 of the Stipulated Agreement. Staff believes this information is critical in evaluating and responding to the overall effects of the COVID-19 pandemic and recovery from the pandemic.

As such, Staff requests the Commission open a rulemaking to set temporary reporting requirements for all Class A and Class B utilities consistent with paragraph 16 12 before the end of 2020. This rulemaking may include both temporary and permanent rulemaking.

PROPOSED COMMISSION MOTION:

Approve the Stipulated Agreement on the Effects of COVID-19 Pandemic on ~~Energy~~ Water Utility Customers, and open a rulemaking to set temporary reporting requirements for all Class A and Class B utilities before the end of 2020.

A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: November 3, 2020**

REGULAR X **CONSENT** **EFFECTIVE DATE** **N/A**

DATE: October 23, 2020

TO: Public Utility Commission

FROM: Michael Dougherty

THROUGH: Michael Grant and Bryan Conway **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 2120)
Investigation into the Effects of the COVID-19 Pandemic on Water Utility Customers.

STAFF RECOMMENDATION:

The Public Utility Commission of Oregon (Commission or PUC) should approve the Stipulated Agreement on the Effects of the COVID-19 Pandemic on Water Utility Customers, and open a rulemaking to set temporary reporting requirements for all Class A and Class B utilities before the end of 2020.

DISCUSSION:

Issues

1. Whether the Commission should approve the stipulated agreement on the effects of COVID-19 Pandemic on water utility customers, and
2. Whether the Commission should open a rulemaking to set temporary reporting requirements for all Class A and Class B utilities before the end of 2020.

Applicable Law

ORS 756.040 describes the general powers and duties of the Commission in supervising and regulating public utilities and telecommunications utilities, which include representing the customers of any public utility or telecommunications utility and the public generally in all controversies respecting rates, valuations, service, and all matters

Docket No. UM 2120
October 23, 2020
Page 2

of which the commission has jurisdiction. The Commission's regulatory authority is further specified in ORS Chapters 756, 757 and 759, as relevant here. The Commission has adopted administrative rules relevant to the matters discussed herein in OAR Chapter 860, Divisions 21, 34 and 36.

Under ORS 756.060, the Commission is authorized to "adopt and amend reasonable and proper rules and regulations relative to all statutes administered by the commission" and to "adopt and publish reasonable and proper rules to govern proceedings and to regulate the mode and manner of all investigations and hearings of public utilities and telecommunications utilities and other parties before the commission."

On March 8, 2020, Governor Brown declared a statewide state of emergency due to the public health threat posed by the novel infectious coronavirus, COVID-19.¹ Several extensions of that order have been issued, and the state of emergency is currently extended to November 3, 2020.² In a related executive order, the Governor explains that COVID-19 is a global pandemic that is causing a significant economic downturn in Oregon, imposing sustained economic hardship on many Oregonians in the form of lost wages and an inability to pay basic household expenses.³ Oregonians were directed to stay home to the greatest extent possible and a number of government offices and retail businesses were closed.⁴ Phased re-opening has begun but is not complete, and the restrictions may be re-imposed based on changing conditions.⁵

Analysis

Background

On June 9, 2020, the Commission conducted a Special Public Meeting on the topic of *"Impact to Utility Customers during the COVID-19 Pandemic and Future Economic Recovery."* During this public meeting, the Commission heard from investor-owned energy, water, and telecommunications utilities, as well as customer groups, and other stakeholders on the impacts of the COVID-19 pandemic, including actions taken by utilities and additional actions needed to protect customers during this pandemic.

Prior to the meeting, numerous investor-owned water utilities had already taken voluntary actions to assist customers, including: suspending disconnections of residential and non-residential accounts, stopping distribution of late and final notices, stopping late fee assessment, and offering more and flexible payment arrangements.

¹ EO 20-03 (March 8, 2020).

² EO 20-24 (May 1, 2020); EO 20-30 (June 30, 2020); EO 20-38 (September 1, 2020).

³ See EO 20-11 (March 22, 2020).

⁴ EO 20-12 (March 23, 2020).

⁵ See EO 20-27 (June 5, 2020).

Docket No. UM 2120
October 23, 2020
Page 3

On September 24, 2020, the Commission authorized Staff, and the affected utilities and stakeholders, to execute three stipulations incorporating the three term sheets (Energy, Water, and Telecommunications) that were developed during the Commission's Investigation into the Effects of the COVID-19 Pandemic on Utility Customers.

During the timeframe between September 24, 2020 and October 23, 2020, Parties refined the Water Term Sheet and developed a Stipulated Agreement on terms and conditions to assist customers and utilities during the current COVID-19 pandemic and the aftermath of the pandemic.

The Stipulated Agreement has been endorsed by Staff, Avion Water Company, Community Action Partnership of Oregon, Oregon Citizens' Utility Board, Oregon Water Utilities – Cline Butte, Inc., Oregon Water Utilities – Mountain Lakes, Inc., Salmon Valley Water Company, and Sunriver Water LLC.

Stipulated Agreement

The Stipulated Agreement is attached as Attachment A. Major features of the Stipulated Agreement include:

- Disconnects will not start until December 1, 2020, and only after certain customer notifications are made.
- During the COVID-19 pandemic, Time Payment Arrangements (TPAs) will be offered up to 12 months for residential customers with no down payment and up to three months to non-residential customers.
- Residential and non-residential customers who seek to renegotiate a TPA may do so one time under the same terms of the original agreement.
- Service disconnection and reconnection fees will not be applied until December 1, 2020.
- Late payment fees, interest, and penalties for all residential customers retroactive to the date of the start of disconnection moratoriums and through December 1, 2020, will not be accrued or collected.
- Prior to November 15, 2020, each Utility will reconnect those residential customers that request reconnection and who were disconnected for nonpayment between January 1, 2020 and March 13, 2020, except for circumstances related to unsafe conditions, tampering or theft.

Docket No. UM 2120
October 23, 2020
Page 4

- Water Utilities will continue their current practices of not reporting late payments and nonpayment for active customers to credit bureaus and reporting agencies.
- Under most circumstances, service disconnections for non-payment will be limited between the hours of 8:00 am and 2:00 pm to facilitate responsive, same-day reconnection of service through December 1, 2021.
- Water Utilities will not use third parties to collect past due charges from active residential customers, until December 31, 2022.
- Staff will review water customer rules (OAR 860, Division 36) and request a rulemaking no later than December 1, 2020, if changes need to be made. After the initial review is completed, Staff will notify utilities if a waiver of a rule is required to meet the terms and conditions in the stipulation.
- Staff will recommend approval of the Water Utilities' applications for deferred accounting of COVID-19 related costs and benefits. Recovery of those amounts deferred will be subject to a future Commission prudence review proceeding to assure deferrals are either directly related to this stipulation or are related to other increased costs due to COVID-19. The deferrals will be accrued at a lower interest rate than the utility's cost of capital demonstrating meaningful shareholder contributions.
- Class A and B water utilities will provide to Commission Staff enhanced reporting for eight quarters (two years) starting January 29, 2021 (for the previous quarter, October to December) and such reports will be provided on a quarterly basis after the end of the reporting quarter.

Rulemaking on Reporting Requirements

Although the reporting condition above applies to the water utilities that are parties to the Stipulated Agreement, Staff recommends that all Class A and B water utilities be required to adhere to the temporary reporting requirements in paragraph 16 of the Stipulated Agreement. Staff believes this information is critical in evaluating and responding to the overall effects of the COVID-19 pandemic and recovery from the pandemic.

As such, Staff requests the Commission open a rulemaking to set temporary reporting requirements for all Class A and Class B utilities consistent with paragraph 16 before the end of 2020. This rulemaking may include both temporary and permanent rulemaking.

Docket No. UM 2120
October 23, 2020
Page 5

Rule Review

Staff has begun its review of the relevant administrative rules and offers the following comments. Under OAR 860-036-1420(3), payment plans require a one-twelfth payment due with the first payment, which may be construed as a down payment. Section (4) of the rule provides, “The water utility and customer may agree to an alternate time-payment plan provided the utility informs the customer of the options in section (3) of this rule.” Each utility may wish to request a temporary waiver of section (3) of this rule, unless and until any permanent changes may be made to this rule.

Staff will continue to engage with the utilities and stakeholders on its review of the Commission’s rules under the terms of the Stipulated Agreement.

Conclusion

Staff finds the Stipulated Agreement meets the goals of the Commission’s investigation in Docket No. UM 2114 and provides necessary protections and benefits to water utility customers affected by the COVID-19 pandemic.

PROPOSED COMMISSION MOTION:

Approve the Stipulated Agreement on the Effects of COVID-19 Pandemic on Energy Utility Customers, and open a rulemaking to set temporary reporting requirements for all Class A and Class B utilities before the end of 2020.

UM 2120

ORDER NO. 20-400

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2120

In the Matter of)	
)	STIPULATED AGREEMENT
INVESTIGATION INTO THE EFFECTS)	ON EFFECTS OF COVID-19
OF COVID-19 PANDEMIC)	PANDEMIC ON WATER UTILITY
ON WATER UTILITY CUSTOMERS)	CUSTOMERS
)	

PARTIES

This Stipulated Agreement is entered into by and between Staff of the Public Utility Commission of Oregon (“Staff”), Avion Water Company (“Avion”), Community Action Partnership of Oregon (“CAPO”), Oregon Citizens’ Utility Board (“CUB”), Oregon Water Utilities – Cline Butte, Inc. (“Cline Butte”), Oregon Water Utilities – Mountain Lakes, Inc. (“Mountain Lakes”), Salmon Valley Water Company (“Salmon Valley”) and Sunriver Water LLC (“Sunriver”), as set forth below to settle and resolve all issues in the above-captioned proceeding. The participating water utilities are Avion, Cline Butte, Mountain Lakes, Salmon Valley, and Sunriver (each a “Utility” and collectively the “Utilities”). CAPO, CUB, Avion, Cline Butte, Mountain Lakes, Salmon Valley, Sunriver, and Staff (collectively “the Parties”) request that the Commission enter an Order approving this Stipulated Agreement.

BACKGROUND

On March 8, 2020, Oregon Governor Kate Brown declared a statewide state of emergency due to the public health threat posed by the novel infectious coronavirus, COVID-

ORDER NO. 20-400

19.¹ Several extensions of that order have been issued, and the state of emergency is currently extended to November 3, 2020.²

Between March 23, 2020 and March 27, 2020, each of the Utilities filed a deferral application, requesting that the Commission authorize the filing utility to defer for later ratemaking treatment purposes costs from the COVID-19 public health emergency. On March 23, 2020, Cline Butte filed its deferral application, docketed as UM 2066, and Mountain Lakes filed its deferral application, docketed as UM 2065. On March 26, 2020, Sunriver filed its deferral application, docketed as UM 2071. On March 27, 2020, Avion filed its deferral application, docketed as UM 2076, and Salmon Valley filed its deferral application, which was docketed as UM 2075.

On June 9, 2020, the Commission held a Special Public Meeting on the impacts of COVID-19. As a result of the Special Public Meeting, the Commission opened an investigation into the effects of COVID-19, which would later be docketed as UM 2114. The purpose of the investigation was to:

- A) Develop and share relevant information concerning actions taken by utilities concerning COVID-19;
- B) Ensure the PUC takes an integrated, timely approach to COVID-19 related issue, and that all relevant aspects of the challenge are considered;
- C) Ensure stakeholder engagement, input, and awareness; and
- D) Provide information that will inform other, related dockets and Commission process.

Staff conducted a thorough investigation that included six general workshops, two data-focused workshops, one workshop dedicated to issues concerning water utilities, and two workshops dedicated to issues concerning telecommunications utilities from the period of June

¹ EO 20-03 (March 8, 2020).

² EO 20-24 (May 1, 2020); EO 20-30 (June 30, 2020); EO 20-28 (September 1, 2020).

ORDER NO. 20-400

30, 2020 to September 15, 2020. Staff developed a survey that canvassed various participants and others interested in proposed regulatory solutions to assist customers and utilities during the current COVID-19 pandemic and the aftermath of the pandemic. Additionally, a Commission Workshop and Commission Public Meeting were held on this subject. These efforts led to the creation of a Water Term Sheet representing agreement in principle by the Parties. On September 24, 2020, the Commission held a Special Public Meeting, at which the Commission authorized the Parties to execute a stipulation incorporating the Water Term Sheet.³ This docket, UM 2120, was opened specifically for addressing the effects on water utility customers.

The intent of this Stipulated Agreement is to:

- A) Memorialize the customer protections that Class A and B water utilities subject to the jurisdiction of the Public Utility Commission of Oregon (“Commission”) have voluntarily put in place during the COVID-19 pandemic;
- B) Obtain an order from the Commission directed to each participating Utility approving this Stipulated Agreement and memorializing the public process that led to this Stipulated Agreement;
- C) Establish additional customer protections to mitigate the resumption of utility service disconnections and late fees; and
- D) Establish regulatory certainty for incremental net costs that Utilities have incurred, and will incur, as a result of the COVID-19 pandemic, including but not limited to all costs associated with the topics of this Stipulated Agreement.

AGREEMENT

The Parties agree as follows:

Suspension of Utility Disconnections and the Imposition of Late Fees

1. Due to the COVID-19 pandemic, on or about March 13, 2020, certain of the Utilities voluntarily initiated a suspension of disconnecting customers for non-payment and the imposition of late fees on past due bills.

³ Docket No. UM 2114, Order No. 20-324.

ORDER NO. 20-400

2. For Utilities that have suspended disconnections for nonpayment and imposition of late fees on past due bills, between October 1, 2020 and November 30, 2020, each Utility must notify in writing all its residential and commercial customers with past due balances of: 1) the resumption of utility service disconnections and late fees, and 2) all flexible payment options that are available to avoid disconnection. The notice must include the time payment arrangement (“TPA”) described below, and how to enroll in a TPA.

3. The Utilities may resume disconnecting service for non-payment on and after December 1, 2020. After that date, a Utility may disconnect a customer for non-payment only after the following has occurred:

- a. The Utility has provided notice to the customer subject to disconnection as provided in paragraph 2;
- b. The Utility has provided notice to the customer subject to disconnection as specified in applicable regulations and the Utility’s tariff;⁴
- c. The Utility has made a good faith effort to contact the customer to inform the customer of flexible payment options, financial assistance programs, and any other means to avoid disconnection. These efforts will be documented consistent with utilities current practices; and
- d. The requisite period of time specified in the Utility’s tariff for the customer to enter into an arrangement to avoid disconnection has passed.

Additional Customer Programs and Initiatives

4. Due to the COVID-19 pandemic, each Utility will offer TPAs of up to 12 months for residential customers and up to three months for non-residential customers. For residential customers, no down payment is required. For non-residential customers, a minimum 10 percent down payment may be required. A Utility may provide flexibility on the length of a

⁴ Oregon Administrative Rules, Division 36.

ORDER NO. 20-400

1 TPA based on a customer's circumstances relating to the pandemic, balancing the
2 customer's circumstances and prudent utility operating practices.

3 5. A residential customer who defaults the first time on a TPA or who seeks to renegotiate
4 payment arrangements, may do so at least one time under the same terms specified above.

5 6. A non-residential customer who defaults the first time on a TPA or who seeks to renegotiate
6 payment arrangements, may do so at least one time under the same terms specified above.

7 7. Each Utility shall not apply service disconnection and reconnection fees until December 1,
8 2020. Utilities may include associated costs in deferral tracking as described below.

9 8. Each Utility will not accrue and collect late payment fees, interest, and penalties for all
10 residential customers retroactive to the date of the start of disconnection moratoriums and
11 through December 1, 2020. Utilities may include associated costs in deferral tracking as
12 described below.

13 9. Prior to November 15, 2020, each Utility will reconnect those residential customers that
14 request reconnection and who were disconnected for nonpayment between January 1, 2020
15 and March 13, 2020, except for when reconnection could compromise safe operations, the
16 Utility has proof that the customer benefitted from theft or tampering, or the premises are
17 vacant or unoccupied. Reconnections will only be offered for the same service address that
18 was previously disconnected for nonpayment, and each Utility shall waive any fees for
19 reconnections provided under this paragraph.

20 10. Utilities will continue their current practices of not reporting late payments and nonpayment
21 for active customers to credit bureaus and reporting agencies.

22 11. Service disconnections for non-payment will be limited between the hours of 8:00 a.m. and
23 2:00 p.m. to facilitate responsive, same-day reconnection of service through December 1,

ORDER NO. 20-400

2021. Utilities will endeavor to reconnect customers on the same day of disconnections if opportunity and time allows for same day reconnections.

12. Utilities will provide relevant credit and collections data to the Commission as listed in Attachment A. The list of such data was developed in discussion with the signatories to this Stipulated Agreement. These discussions included weighing the costs and benefits of providing such data and the underlying purpose in collecting it. Attachment A includes a list of required reporting under this Stipulated Agreement.

13. Utilities will not use third parties to collect past due charges from active residential customers, until December 31, 2022. Utilities may include associated costs in deferral tracking as described below.

14. Staff will review and request a rulemaking to revise the following (and other applicable) rules no later than December 1, 2020, if changes are required and recommend a temporary rulemaking when necessary:

- a. OAR 860-036-1210, Establishing Credit for Residential Service
- b. OAR 860-036-1220, Deposits for Residential Service
- c. OAR 860-036-1230, Surety Agreements
- d. OAR 860-036-1240, Deposit Payment Arrangements for Residential Service
- e. OAR 860-036-1250, Interest on Deposits for Residential and Nonresidential Service by Rate-Regulated Utilities
- f. OAR 860-036-1260, Refund of Deposits
- g. OAR 860-036-1410, Application of Partial Payments
- h. OAR 860-036-1420, Time-Payment Agreements for Residential Water Service
- i. OAR 860-036-1430, Late Payment Charge
- j. OAR 860-036-1500, Grounds for Involuntary Disconnection
- k. OAR 860-036-1510, Required Notices for Involuntary Disconnection
- l. OAR 860-036-1520, Delivery of Notices for Involuntary Disconnection

ORDER NO. 20-400

- m. OAR 860-036-1530, Water Utility Requirements on the Day of Involuntary Disconnection
- n. OAR 860-036-1550, Disconnection of Water Service to Tenants
- o. OAR 860-036-1570, Reconnection of Residential Water Service
- p. OAR 860-036-1580, Disconnection, Reconnections, and Field Visit Charges
- q. OAR 860-036-1590, Tampering with Water Utility Facilities, Theft, or Unauthorized Use of Water

After the initial review is completed, Staff will notify utilities if a waiver of a rule is required to meet the terms and conditions in this Stipulated Agreement.

Utility Costs Resulting from COVID-19

15. The signatory parties agree that the Utilities' applications for deferred accounting of COVID-19 related costs and benefits should be approved by the Commission, and recovery of those amounts deferred will be subject to a future Commission prudence review proceeding to assure deferrals are either directly related to this Stipulated Agreement or are related to other increased costs due to COVID-19. These COVID-19 related deferrals shall consist of the following:

- a. Direct costs for reasonable measures taken by the Utility in response to the COVID-19 pandemic, including, but not limited to: incremental personal protective equipment, cleaning supplies and services, contact tracing, medical testing, financing costs to secure liquidity including carrying costs associated with TPAs, information technology updates and administration needed to enact this Stipulated Agreement, and equipment needed for remote work options. Direct costs are net of credits, payments, cost savings, or other benefits received by the Utility from shareholder contributions or a federal, state, or local government that are directly related to a COVID-19 direct cost, including federal, state, or local tax credits or benefits. Due to the unprecedented nature of the COVID-19 pandemic, not all costs may be known at this time. Utilities are not limited to deferring costs that are expressly enumerated above; provided, however, that all such costs are subject to a future Commission prudence review proceeding.
- b. The amount of late payment fees not assessed to customers between March 1, 2020 and when the Utility resumes collection activity and disconnections. The

ORDER NO. 20-400

amount of late payment fees not assessed shall be calculated assuming only one late payment fee is assessed per customer, (if such customer would have been charged a late payment fee over the March through November 2020 time period) with such late payment amount equal to the current bill and any past due amounts (up to November 30, 2020) excluding the effects of any compounding of interest charges.

c. For bad debt expense, the amount that is currently being collected from customers for bad debt, as determined in its last general rate proceeding, would be the baseline. Any amount of bad debt expense incurred above this baseline would be deferred for later recovery.

d. The amount of forgone reconnection charges, field visits that do not result in disconnection, and field connection charges not assessed to customers between March 1, 2020 and December 1, 2020. These forgone reconnection charges and field connection charges shall not exceed the difference between the actual charges recorded by the utility in 2020 and the authorized annual level of reconnection charges and field connection charges authorized in the Utility's last rate case.

e. The amount of forgone reconnection charges incurred through November 15, 2020 related to customers that may have been disconnected prior to the March 13, 2020 suspension of disconnects. Forgone reconnection fees shall not exceed the amount equal to one reconnection fee per customer who was reconnected to service without charge, pursuant to paragraph 9. The reconnection fee shall be calculated using the applicable reconnection fee available in the Utility's tariff for reconnection during regular working hours for the reconnected customer.

f. The deferral balance whether being accrued or being amortized, shall accrue the same interest rate, and equal to the blended Treasury rate plus 100 basis points. To the extent the amortization of the deferral is more than two years for a utility, the utility may request a larger basis point spread reflecting the pattern of interest rates in the then current yield curve for Treasury securities.

16. Each Utility that has requested regulatory assets for costs associated with COVID-19 shall provide the Commission with the following reports that itemize the utility costs resulting from COVID-19 described in the previous paragraphs. The first report will be for the period between March 1, 2020 and September 30, 2020, and shall be filed by December 1, 2020.

ORDER NO. 20-400

1 The second report will be for the period between October 1, 2020 and December 31, 2021,
2 and shall be filed by February 26, 2022.

3 **General Terms and Conditions**

4 17. The Parties recommend that the Commission issue an order adopting this Stipulated
5 Agreement. The Parties voluntarily and without duress waive any right to hearing on or
6 appeal of a Commission order adopting this Stipulated Agreement.

7 18. No Party shall be deemed to have approved, admitted, or consented to the facts, principles,
8 methods, or theories employed by any other Party in arriving at the terms in this Stipulated
9 Agreement. No Party shall be deemed to have agreed that any provision of this Stipulated
10 Agreement is appropriate for resolving issues in any subsequent proceeding, except for
11 purposes of carrying out the provisions of this Stipulated Agreement, in the subsequent
12 dockets necessary to effectuate this Stipulated Agreement.

13 19. Each Party acknowledges that they are signing this Stipulated Agreement in good faith and
14 that they intend to abide by the terms of this Stipulated Agreement unless and until it is
15 rejected or adopted only in part by the Commission. If the Commission rejects all or any
16 material part of this Stipulated Agreement or adds any material condition to any final order
17 that is not consistent with the Stipulated Agreement, each Party reserves its right to
18 withdraw from this Stipulated Agreement.

19 20. Except where an earlier date is specified herein, the provisions in this Stipulated Agreement
20 will expire on December 31, 2022. The expiration of any provision in this Stipulated
21 Agreement is not intended to affect any changes in administrative rules or legislative action
22 that may follow approval of this Stipulated Agreement.

ORDER NO. 20-400

21. The Parties agree to confer in good faith with other parties, and if a majority of the Parties, including Staff, agree that a change in circumstances warrants either a cancellation or an extension of one or more of the provisions in this Stipulated Agreement, the Parties agree to support a request that the Commission modify that provision as provided below.

22. Definitions of “residential” customers will be provided by each of the Utilities based on each Utility’s applicable tariffs.

23. Definitions of “non-residential” customers will be provided by each of the Utilities based on each Utility’s applicable tariffs.

24. This Stipulated Agreement sets forth the entire agreement between the Parties and supersedes any and all prior communications, understandings, or agreements, oral or written, between the Parties pertaining to the subject matter of this Stipulated Agreement.

25. This Stipulated Agreement will be submitted to the Commission for approval at a public meeting. The Parties agree to support this Stipulated Agreement before the Commission, respond to the Commission’s questions on the Party’s position as may be appropriate and support the Commission’s adoption of this Stipulated Agreement.

26. This Stipulated Agreement may be executed in counterparts and each signed counterpart shall constitute an original document. The Parties further agree that any electronically-generated Party signatures are valid and binding to the same extent as an original signature.

27. This Stipulated Agreement may not be modified or amended except by written agreement among all Parties who have executed it.

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ORDER NO. 20-400

This Stipulation is entered into by each Party on the date entered below such Party's signature.

AVION WATER COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

By: 

By: _____

Johanna Riemenschneider

Name: Jan M Wick

Date: Oct 20, 2020

Date: _____

OREGON WATER UTILITIES –
CLINE BUTTE, INC.

OREGON WATER UTILITIES –
MOUNTAIN LAKES INC.

By: _____

Craig Gott, President

By: _____

Craig Gott, President

Date: _____

Date: _____

SALMON VALLEY WATER COMPANY

COMMUNITY ACTION PARTNERSHIP
OF OREGON

By: _____

Michael Bowman, General Manager

By: _____

Keith Kueny

Date: _____

Date: _____

SUNRIVER WATER LLC

OREGON CITIZENS' UTILITY BOARD

By: _____

Tim Smith, General Manager

By: _____

Mike Goetz

Date: _____

Date: _____

ORDER NO. 20-400

This Stipulation is entered into by each Party on the date entered below such Party's signature.

AVION WATER COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

By: _____

By: /s/ Johanna Riemenschneider
Johanna Riemenschneider

Name: _____

Date: _____

Date: October 22, 2020

OREGON WATER UTILITIES –
CLINE BUTTE, INC.

OREGON WATER UTILITIES –
MOUNTAIN LAKES INC.

By: _____
Craig Gott, President

By: _____
Craig Gott, President

Date: _____

Date: _____

SALMON VALLEY WATER COMPANY

COMMUNITY ACTION PARTNERSHIP
OF OREGON

By: _____
Michael Bowman, General Manager

By: _____
Keith Kueny

Date: _____

Date: _____

SUNRIVER WATER LLC

OREGON CITIZENS' UTILITY BOARD

By: _____
Tim Smith, General Manager

By: _____
Mike Goetz

Date: _____

Date: _____

ORDER NO. 20-400

This Stipulation is entered into by each Party on the date entered below such Party's signature.

AVION WATER COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

By: _____

By: _____

Johanna Riemenschneider

Name: _____

Date: _____

Date: _____

OREGON WATER UTILITIES –
CLINE BUTTE, INC.

Craig Gott

OREGON WATER UTILITIES –
MOUNTAIN LAKES INC.

Craig Gott

By: FE161386726808B3BAA39C0FB6235BB0 contractworks.

By: FE161386726808B3BAA39C0FB6235BB0 contractworks.

Craig Gott, President

Craig Gott, President

Date: **10/19/2020**

Date: **10/19/2020**

SALMON VALLEY WATER COMPANY

COMMUNITY ACTION PARTNERSHIP
OF OREGON

By: _____

By: _____

Michael Bowman, General Manager

Keith Kueny

Date: _____

Date: _____

SUNRIVER WATER LLC

OREGON CITIZENS' UTILITY BOARD

By: _____

By: _____

Tim Smith, General Manager

Mike Goetz

Date: _____

Date: _____

ORDER NO. 20-400

This Stipulation is entered into by each Party on the date entered below such Party's signature.

AVION WATER COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

By: _____

By: _____
Johanna Riemenschneider

Name: _____

Date: _____

Date: _____

OREGON WATER UTILITIES –
CLINE BUTTE, INC.

OREGON WATER UTILITIES –
MOUNTAIN LAKES INC.

By: _____
Craig Gott, President

By: _____
Craig Gott, President

Date: _____

Date: _____

SALMON VALLEY WATER COMPANY

COMMUNITY ACTION PARTNERSHIP
OF OREGON

By: _____
Michael Bowman, General Manager

By: _____
Keith Kueny

Date: 10/19/20

Date: _____

SUNRIVER WATER LLC

OREGON CITIZENS' UTILITY BOARD

By: _____
Tim Smith, General Manager

By: _____
Mike Goetz

Date: _____

Date: _____

ORDER NO. 20-400

This Stipulation is entered into by each Party on the date entered below such Party's signature.

AVION WATER COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

By: _____

By: /s/ Johanna Riemenschneider
Johanna Riemenschneider

Name: _____

Date: _____

Date: October 22, 2020

OREGON WATER UTILITIES –
CLINE BUTTE, INC.

OREGON WATER UTILITIES –
MOUNTAIN LAKES INC.

By: _____
Craig Gott, President

By: _____
Craig Gott, President

Date: _____

Date: _____

SALMON VALLEY WATER COMPANY

COMMUNITY ACTION PARTNERSHIP
OF OREGON

By: _____
Michael Bowman, General Manager

By: Keith Kueny
Keith Kueny

Date: _____

Date: 10/26/2020

SUNRIVER WATER LLC

OREGON CITIZENS' UTILITY BOARD

By: _____
Tim Smith, General Manager

By: _____
Mike Goetz

Date: _____

Date: _____

ORDER NO. 20-400

This Stipulation is entered into by each Party on the date entered below such Party's signature.

AVION WATER COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

By: _____

By: _____
Johanna Riemenschneider

Name: _____

Date: _____

Date: _____

OREGON WATER UTILITIES –
CLINE BUTTE, INC.

OREGON WATER UTILITIES –
MOUNTAIN LAKES INC.

By: _____
Craig Gott, President

By: _____
Craig Gott, President

Date: _____

Date: _____

SALMON VALLEY WATER COMPANY

COMMUNITY ACTION PARTNERSHIP
OF OREGON

By: _____
Michael Bowman, General Manager

By: _____
Keith Kueny

Date: _____

Date: _____

SUNRIVER WATER LLC

OREGON CITIZENS' UTILITY BOARD

By: 
Tim Smith, General Manager

By: _____
Mike Goetz

Date: 10/19/2020

Date: _____

ORDER NO. 20-400

This Stipulation is entered into by each Party on the date entered below such Party's signature.

AVION WATER COMPANY

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

By: _____

By: _____

Johanna Riemenschneider

Name: _____

Date: _____

Date: _____

OREGON WATER UTILITIES –
CLINE BUTTE, INC.

OREGON WATER UTILITIES –
MOUNTAIN LAKES INC.

By: _____

Craig Gott, President

By: _____

Craig Gott, President

Date: _____

Date: _____

SALMON VALLEY WATER COMPANY

COMMUNITY ACTION PARTNERSHIP
OF OREGON

By: _____

Michael Bowman, General Manager

By: _____

Keith Kueny

Date: _____

Date: _____

SUNRIVER WATER LLC

OREGON CITIZENS' UTILITY BOARD

By: _____

Tim Smith, General Manager

By: _____

Mike Goetz, General Counsel

Date: _____

Date: _____

Attachment A
Reporting Requirements

Utilities will provide to Commission Staff enhanced reporting for eight quarters (two years) starting January 29, 2021 (for the previous quarter, October to December) and such reports will be provided on a quarterly basis after the end of the reporting quarter:

- a. The number of connections as of the end of the quarter, by customer class;
- b. The number of customers as of the end of the quarter, by customer class, assessed late payment fees or charges during the period;
- c. The number of customers as of the end of the quarter, by customer class, enrolled in a current Time Payment Agreement (TPA);
- d. The number of customers enrolling in a new TPA;
- e. The number of customers completing a TPA during the period;
- f. The number of customers, by customer class, renegotiating TPAs during the period;
- g. Total number of residential customers with arrearage balances, segmented by 30-60 days; 61-90 days; 91+ days. Reports will include total arrearages and average arrearages for each segment;
- h. Total number of disconnection communications delivered by vintage (15-day, 7-day);
- i. Total number of service disconnections for non-payment; and
- j. Total number of service reconnections, segmented by same-day / next-day reconnect, and any reconnect occurring after next day.