



**Portland General Electric**  
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August 22, 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, “the Company”) submits the following comments as supplemental to the Company’s contribution to Joint Utility comments provided in response to the Notice of Proposed Rulemaking Hearings with Statement of Need, Fiscal Impact Statement, and Proposed Rules (“the Notice”) issued July 1, 2022 and the collective discussion during the first Rulemaking Hearing on July 21, 2022. PGE wishes to highlight the Company’s widespread, fee-free payment options currently offered to all Residential Customers and the afforded flexibility in cases where disconnection for non-payment is considered. The Company has made concerted efforts over the past eight years to increase in-person payment options for Customers while maintaining the safety of PGE’s field employees.

In 2019, PGE filed a request for waiver from OAR 860-021-0405(11) and received approval enabling PGE to cease field collections from Customers for overdue billed amounts prior to disconnecting service. PGE filed this waiver to ensure employee safety by not allowing employees to carry cash in the field. Field employees, especially those that work solo, who are known to carry money in their vehicles are inherently at risk for being attacked and/or robbed as they travel their daily route. Safety is always a top priority for PGE which is why PGE strongly believes that accepting payments in the field should not be a requirement within Division 21.

PGE is committed to providing Customers convenient, free and easy ways to pay their bills. Residential Customers can pay their bill using their checking account or a credit card through the IVA, web, or mobile app for **free** and available 24/7. Residential Customers can also pay their bill using Amazon Pay or PayPal through the web and mobile app for **free** and available 24/7. For Customers seeking to pay using cash, PGE offers **fee-free** payment through Western Union and CheckFreePay. There are over one hundred Western Union and CheckFreePay locations in many retail locations throughout PGE’s service territory (e.g., Walmart, Fred Meyer, etc.) offering convenient locations and hours where Customers can pay in person for free, often when they are already out doing other errands like grocery shopping.

PGE Customers are notified of different ways to make payments via the monthly bill, the 15-day notice and text message, and the 5-day notice and text message. PGE field-employees currently have the discretion to work with Customers who indicate they need additional time to make a payment. However, if the Company is required to delay disconnections regardless of whether a Customer specifically requests additional time to make a payment, this will cause a significant increase in the number of truck rolls which will result in increased costs of business and a potential impact to customer rates. PGE asks that the proposed addition to OAR 860-021-0405(11) concerning the delay of disconnections for a minimum of 24 hours not be accepted into the Division 21 updates.

Sincerely,

*\s\ Robert Macfarlane*

Robert Macfarlane  
Manager, Pricing & Tariffs

cc: AR 653 Service List