



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

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 of the Joint Utilities in Response to Recommended Changes to Division 21 of the Oregon Administrative Rules

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”) submit the following comments 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.

The central issue remaining for the Joint Utilities is the proposed change to the severe weather protection’s temperature threshold, which is discussed below and is followed by a summary of individual utility responses to Staff’s Information Request on this topic. A compilation of individual utility responses to the Information Request is included in Attachment A. Additionally, the Joint Utilities recommend several minor edits intended to increase clarity and consistency within the proposed Division 21 rules. These suggested edits do not introduce new concepts and are included in redline document in Attachment B.

On the topic of extending the 15-day disconnection notification to a 20-day window, the Joint Utilities appreciate the importance of responding to customer feedback provided in focus groups initiated by the Public Utility Commission of Oregon (OPUC). Individual utility information is provided at the end of these comments to indicate the varying timelines and costs anticipated to implement 20-day disconnection notices. The timelines and costs to systematically implement the broader set of low-income protections and fee waivers within the proposed Division 21 rules may be much greater for some utilities.

Severe Weather Protections

The Joint Utilities continue to be concerned with the proposed change to remove the word “high” from the current rules such that a moratorium would be in effect when the temperature forecast is below 32 degrees Fahrenheit at any point in the day.

During the Rulemaking Hearing to discuss the Division 21 rules, Chair Decker and Commissioner Thompson both expressed concern regarding this change and the significant impact it could have on the reduction of days when disconnections may occur.

In particular, and as highlighted previously by the Joint Utilities and discussed by the Commissioners, the temperature in Oregon can sometimes fluctuate 15-20 degrees, and occasionally even up to 30 degrees, in a single day, especially in the late Fall or early Spring. If the proposed change were to be adopted, there would be severe winter weather moratorium days in some parts of the state beginning in September and going all the way into June due to low temperatures, which seems to stretch well beyond the intent of a severe weather moratorium due to winter weather. Also, during the heart of winter, there would likely be months where potential disconnections for non-payment could not occur at all in certain parts of the state, thereby possibly resulting in the increased accumulation of bad debt.

Following the Rulemaking Hearing, Commission Staff issued an information request to each of the utilities to obtain data regarding the number of severe weather moratorium days that occurred in 2020 and 2021 under the current rule and what would have happened under the proposed rules; attached to these comments is each utility's response to Staff's information request. This data will help inform the conversation on this issue and what an appropriate "high" temperature threshold should be, if the Commission decides to change from the current threshold.

Finally, the Joint Utilities continue to believe that maintaining a "high" temperature threshold is the best option compared to the alternative of a "low" temperature threshold, or both a "high" and "low" temperature threshold within a single day. The current "high" model continues to be easy to administer and is easily understandable for customers. As previously mentioned, the Joint Utilities are open to increasing the "high" temperature threshold if the Commission desires to do so and continues to support their previous proposal such that a moratorium would be in effect when a day's forecasted high temperature is below 35 degrees Fahrenheit. At the next Rulemaking Hearing, the Joint Utilities look forward to continuing the discussion on this issue.

Staff's Information Request and Individual Utility Responses

Please provide the number of business days a severe weather moratorium would be triggered by the 32-degree temperature threshold under the current language and the proposed changes to 860-21-0407 (1). Please provide the data by year (2020 and 2021) and county.

- a. Please provide the number of days a severe weather moratorium would be in effect due to a forecasted temperature less than 32 degrees. (Proposed language)
- b. Please provide the number of days a severe weather moratorium would be in effect due to a high temperature of 32 degrees. (Current language)

Please exclude days covered under 860-021-0320:

Disconnection of Service on Weekends and Holidays

Utility service shall not be disconnected for nonpayment on a weekend or a state- or utility-recognized holiday. Utility service shall not be disconnected for nonpayment on a Friday or the day before a state- or utility-recognized holiday unless mutually agreed upon by the customer, utility, and the Commission’s Consumer Services Division.

Table 1. Sum of days in each county triggered by a severe weather moratorium beyond those already excluded under 860-021-0320, by utility

| Utility | Current language “high temperature” | | Proposed language “low temperature” | |
|---------------------------|--|-------------|--|-------------|
| | 2020 | 2021 | 2020 | 2021 |
| Avista | 4 | 19 | 220 | 235 |
| Cascade | 9 | 23 | 260 | 240 |
| Idaho Power | 13 | 29 | 270 | 273 |
| NW Natural | 1 | 4 | 197 | 159 |
| Pacific Power | 12 | 12 | 1,643 | 1,523 |
| Portland General Electric | 0 | 1 | 59 | 42 |

Rule Change Implementation

Table 2. Division 21 rule change implementation timelines and impacts

| Utility | Estimated Activation | Impacts to Collections Process | Range of Estimated IT Investments |
|---------------|---|---|-----------------------------------|
| Avista | Within 30 days of final order adopting rules for 20-day notice. | An additional 5 days will be added to the collections process. | Minimal |
| Cascade | Up to 60-days after conclusion of rules for implementation, configuration, and testing. | It will require configuration changes to our collection process templates in order to align when the system kicks off severance with the notice pay by date that is calculated by the letter extract. | Up to \$50,000 |
| Idaho Power | Mid-Q2 2023 for 20-day notice | Reconfiguration of the Company's collections system will provide an additional 5 days to customers' existing collections cycle. | \$15,000 - \$30,000 |
| NW Natural | January 2023 for items not related to 20-day notice TBD for 20-day notice | NW Natural is still identifying the best course of action to comply with the 20-day notice changes | TBD |
| Pacific Power | Q1 2023 to adopt all rule changes | An additional 5 days will be added to the collections process. | TBD |
| PGE | Q1 2023 for most items not related to 20-day notice TBD for 20-day notice | PGE is still identifying the best course of action to comply with the 20-day notice changes | TBD |

Other

In addition to the above, the Joint Utilities seek Commission clarification on the sunset of protections granted by the Commission through Order No. 21-236, issued July 23, 2021 in UM 2114. Because many of the proposed Division 21 rule modifications have incorporated the transitional protections put into place last summer, the Joint Utilities seek Commission clarification as to whether such transitional protections shall cease upon the revised Division 21 rules going into effect.

Summary

The Joint Utilities appreciate the opportunity to provide follow-up comments and look forward to engaging in further conversations throughout this rulemaking.

Thank you,

/s/ Shawn Bonfield
Sr. Manager of Regulatory Policy & Strategy
Avista Utilities

/s/ Connie Aschenbrenner
Rate Design Manager
Idaho Power Company

/s/ Robert Meredith
Director, Pricing and Tariff Policy
PacifiCorp

/s/ Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas

/s/ Natasha Siores
Manager, Regulatory Affairs
NW Natural

/s/ Robert Macfarlane
Manager, Pricing & Tariffs
Portland General Electric Company

AR 653

Formal Rulemaking Round 2 Comments of the Joint Utilities

Attachment A

**AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION**

| | | | |
|---------------|---------------------|----------------|-------------------------------|
| JURISDICTION: | Oregon | DATE PREPARED: | 08/01/2022 |
| CASE NO.: | AR 653 | WITNESS: | Shawn Bonfield |
| REQUESTER: | PUC Staff | RESPONDER: | Shawn Bonfield |
| TYPE: | Information Request | DEPT: | Regulatory Affairs |
| REQUEST NO.: | Staff – 01 | TELEPHONE: | (509) 495-2782 |
| | | EMAIL: | shawn.bonfield@avistacorp.com |

REQUEST:

- (1) Please provide the number of business days a severe weather moratorium would be triggered by the 32-degree temperature threshold under the current language and the proposed changes to 860-21-0407 (1). Please provide the data by year (2020 and 2021) and county.
- a. Please provide the number of days a severe weather moratorium would be in effect due by a forecasted less than of 32 degrees. (Proposed language)
 - b. Please provide the number of days a severe weather moratorium would be in effect due to a high temperature of 32 degrees. (Current language)

Please exclude days covered under 860-021-0320:

Disconnection of Service on Weekends and Holidays

Utility service shall not be disconnected for nonpayment on a weekend or a state- or utility-recognized holiday. Utility service shall not be disconnected for nonpayment on a Friday or the day before a state- or utility-recognized holiday unless mutually agreed upon by the customer, utility, and the Commission’s Consumer Services Division.

RESPONSE:

The following table includes the number of severe weather moratorium days under the current rule and proposed rule for each primary city the Company serves in Oregon. Note weather data is not available by county. Fridays, weekends, state holidays, and the day before state holidays have been excluded from the data.

| Service Area | 2020 | | 2021 | |
|----------------------|--------------|---------------|--------------|---------------|
| | Current Rule | Proposed Rule | Current Rule | Proposed Rule |
| Grants Pass | 0 | 21 | 5 | 37 |
| Klamath Falls | 2 | 84 | 8 | 95 |
| La Grande | 2 | 72 | 6 | 74 |
| Medford | 0 | 29 | 0 | 24 |
| Roseburg | 0 | 14 | 0 | 5 |

CASCADE NATURAL GAS CORPORATION
Oregon Public Utility Commission
Strengthening Customer Protections Concerning Disconnections
AR 653

Request No. 1

Date prepared: August 2, 2022

Preparer: Chris Mickelson

Contact: Chris Mickelson

Telephone: (509)-734-4549

Topic or Keyword:

- (1) Please provide the number of business days a severe weather moratorium would be triggered by the 32-degree temperature threshold under the current language and the proposed changes to 860-21-0407 (1). Please provide the data by year (2020 and 2021) and county.
 - a. Please provide the number of days a severe weather moratorium would be in effect due by a forecasted less than of 32 degrees. (Proposed language)
 - b. Please provide the number of days a severe weather moratorium would be in effect due to a high temperature of 32 degrees. (Current language)

Please exclude days covered under 860-021-0320:

Disconnection of Service on Weekends and Holidays

Utility service shall not be disconnected for nonpayment on a weekend or a state- or utility-recognized holiday. Utility service shall not be disconnected for nonpayment on a Friday or the day before a state- or utility-recognized holiday unless mutually agreed upon by the customer, utility, and the Commission's Consumer Services Division

CASCADE NATURAL GAS CORPORATION
Oregon Public Utility Commission
Strengthening Customer Protections Concerning Disconnections
AR 653

Response:

Cascade does not store weather data by county; however, Cascade does have the weather information by service district; the service districts and the counties they cover are:

- District 1: Baker, Malheur
- District 2: Crook, Jefferson
- District 3: Deschutes, Klamath
- District 4: Morrow, Umatilla

Cascade serves the following counties within Oregon (customers served in county): Baker (4,092), Crook (3,716), Deschutes (52,283), Jefferson (1,807), Klamath (284), Malheur (4,848), Morrow (552), Umatilla (13,378).

Current Rule Data:

Below is the weather event table that shows the number of days in calendar years 2020 and 2021 where high temperature was 32 degrees or below within Cascade’s service area.

Days when Highs are Below 32 degrees (Current Rule)

| | <u>District 1</u> | <u>District 2</u> | <u>District 3</u> | <u>District 4</u> |
|-------------------|-------------------|-------------------|-------------------|-------------------|
| Customers Served | 8,940 | 5,523 | 52,567 | 13,930 |
| 2020 | | | | |
| Monday | 0 | 0 | 1 | 1 |
| Tuesday | 1 | 1 | 1 | 1 |
| Wednesday | 2 | 0 | 0 | 0 |
| Thursday | 0 | 1 | 0 | 0 |
| Friday | 2 | 0 | 0 | 0 |
| Saturday | 0 | 1 | 0 | 1 |
| Sunday | 0 | 0 | 0 | 1 |
| Monday – Thursday | 3 | 2 | 2 | 2 |
| 2021 | | | | |
| Monday | 2 | 2 | 0 | 4 |
| Tuesday | 1 | 1 | 1 | 2 |
| Wednesday | 2 | 1 | 1 | 1 |
| Thursday | 1 | 2 | 1 | 1 |
| Friday | 2 | 2 | 1 | 2 |
| Saturday | 2 | 1 | 0 | 1 |
| Sunday | 3 | 1 | 1 | 1 |
| Monday – Thursday | 6 | 6 | 3 | 8 |

CASCADE NATURAL GAS CORPORATION
Oregon Public Utility Commission
Strengthening Customer Protections Concerning Disconnections
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Proposed Rule Data:

Below is the weather event table that shows the number of days in calendar years 2020 and 2021 where temperature of the day was below 32 degrees within Cascade’s service area.

Days Below 32 degrees (Proposed Rule)

| | <u>District 1</u> | <u>District 2</u> | <u>District 3</u> | <u>District 4</u> |
|-------------------|-------------------|-------------------|-------------------|-------------------|
| Customers Served | 8,940 | 5,523 | 52,567 | 13,930 |
| 2020 | | | | |
| Monday | 22 | 13 | 18 | 16 |
| Tuesday | 23 | 15 | 15 | 12 |
| Wednesday | 23 | 7 | 20 | 6 |
| Thursday | 25 | 17 | 15 | 13 |
| Friday | 25 | 13 | 18 | 9 |
| Saturday | 21 | 9 | 14 | 7 |
| Sunday | 22 | 13 | 13 | 12 |
| Monday – Thursday | 93 | 52 | 68 | 47 |
| 2021 | | | | |
| Monday | 22 | 10 | 12 | 11 |
| Tuesday | 26 | 14 | 12 | 12 |
| Wednesday | 26 | 14 | 17 | 12 |
| Thursday | 20 | 11 | 14 | 7 |
| Friday | 22 | 11 | 13 | 9 |
| Saturday | 26 | 8 | 14 | 8 |
| Sunday | 21 | 7 | 15 | 8 |
| Monday – Thursday | 94 | 49 | 55 | 42 |

Proposed Rule Change Analysis:

To determine total number of non-disconnect days within calendar years 2020 and 2021, Cascade first eliminates Friday, Saturday, Sunday, and observed holidays which also didn’t follow on a Friday, Saturday, or Sunday; this results in the following:

| Number of Non-Disconnect Days | | |
|--------------------------------------|------|------|
| Calendar Year | 2020 | 2021 |
| Fridays | 52 | 53 |
| Saturdays | 52 | 52 |
| Sundays | 52 | 52 |
| Observed Holidays | 8 | 7 |
| Total Non-Disconnect Days | 164 | 164 |

CASCADE NATURAL GAS CORPORATION
Oregon Public Utility Commission
Strengthening Customer Protections Concerning Disconnections
AR 653

The proposed rule change analysis for number of disconnect days takes the calendar days for either 2020 or 2021 minus their respective total non-disconnect days and weather events based on either current or proposed rules that only include Monday through Thursday. This provides Cascade with disconnect days allowed; see table below.

| 2020 | | <u>District 1</u> | <u>District 2</u> | <u>District 3</u> | <u>District 4</u> |
|--------------------------------------|---------------------------|-------------------|-------------------|-------------------|-------------------|
| Current | Calendar Days | 366 | 366 | 366 | 366 |
| | Total Non-Disconnect Days | 164 | 164 | 164 | 164 |
| | Weather Event Days | 3 | 2 | 2 | 2 |
| | Disconnect Days Allowed | 199 | 200 | 200 | 200 |
| Proposed | Calendar Days | 366 | 366 | 366 | 366 |
| | Total Non-Disconnect Days | 164 | 164 | 164 | 164 |
| | Weather Event Days | 93 | 52 | 68 | 47 |
| | Disconnect Days Allowed | 109 | 150 | 134 | 155 |
| Reduction in Disconnect Days Allowed | | 90 | 50 | 66 | 45 |
| Change in Disconnect Days Allowed | | 45.2% | 25.0% | 33.0% | 22.5% |
| 2021 | | | | | |
| Current | Calendar Days | 365 | 365 | 365 | 365 |
| | Total Non-Disconnect Days | 164 | 164 | 164 | 164 |
| | Weather Event Days | 6 | 6 | 3 | 8 |
| | Disconnect Days Allowed | 195 | 195 | 198 | 193 |
| Proposed | Calendar Days | 365 | 365 | 365 | 365 |
| | Total Non-Disconnect Days | 164 | 164 | 164 | 164 |
| | Weather Event Days | 94 | 49 | 55 | 42 |
| | Disconnect Days Allowed | 107 | 152 | 146 | 159 |
| Reduction in Disconnect Days Allowed | | 88 | 43 | 52 | 34 |
| Change in Disconnect Days Allowed | | 45.1% | 22.1% | 26.3% | 17.6% |

Analysis of the impact of Proposed Rule compared to the Current Rule reduces the total number of disconnect days allowed on average between 34 and 90 days, depending on the service area and weather conditions. The proposed language change of removing “high” from the Current Rule would reduce disconnect days based on weather conditions by approximately 17.6 to 45.2 percent. This analysis does not include Cascade’s self-imposed practice to not disconnect during winter break due to children being off from school and at home, which could further reduce the number of disconnect days if Cascade kept this self-imposed practice.

Topic or Keyword:

STAFF'S DATA REQUEST NO. 1:

Please provide the number of business days a severe weather moratorium would be triggered by the 32-degree temperature threshold under the current language and the proposed changes to 860-21-0407 (1). Please provide the data by year (2020 and 2021) and county.

- a. Please provide the number of days a severe weather moratorium would be in effect due by a forecasted less than of 32 degrees. (Proposed language)
- b. Please provide the number of days a severe weather moratorium would be in effect due to a high temperature of 32 degrees. (Current language)

Please exclude days covered under 860-021-0320:

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IDAHO POWER COMPANY'S RESPONSE TO STAFF'S DATA REQUEST NO. 1:

Please see the data provided within the below tables in response to this request and note that Idaho Power offers a Commission-approved winter protection program.¹ As a result of Idaho Power offering a Commission-approved winter protection program, cold-weather protections are provided to customers in accordance with OAR 860-021-0407(8) and Rule F of the Company's Tariff.

- a. Proposed OAR 860-021-0407(1) language:

| County (Idaho Power's service area only): | Severe Weather Moratorium, Days' Temperature Less Than 32°F² | |
|--|--|-------------|
| | 2020 | 2021 |
| Baker | 93 | 91 |
| Harney | 91 | 99 |
| Malheur | 86 | 83 |

- b. Current OAR 860-021-0407(1) language:

| County (Idaho Power's service area only): | Severe Weather Moratorium, Days' High Temperature Less Than 32°F² | |
|--|---|-------------|
| | 2020 | 2021 |
| Baker | 5 | 11 |
| Harney | 6 | 10 |
| Malheur | 2 | 8 |

¹ Docket No. ADV 637, Idaho Power Winter Protection Program.

² Data is based on observed daily temperatures during the year.



Rates & Regulatory Affairs

AR 653

Strengthening Customer Protections Concerning Disconnections

Data Request Response

Request No.: AR 653 OPUC IR 1

1. Please provide the number of business days a severe weather moratorium would be triggered by the 32-degree temperature threshold under the current language and the proposed changes to 860-21-0407 (1). Please provide the data by year (2020 and 2021) and county.

a. Please provide the number of days a severe weather moratorium would be in effect due by a forecasted less than of 32 degrees. (Proposed language)

b. Please provide the number of days a severe weather moratorium would be in effect due to a high temperature of 32 degrees. (Current language)

Please exclude days covered under 860-021-0320:

Disconnection of Service on Weekends and Holidays

Utility service shall not be disconnected for nonpayment on a weekend or a state- or utility-recognized holiday. Utility service shall not be disconnected for nonpayment on a Friday or the day before a state- or utility-recognized holiday unless mutually agreed upon by the customer, utility, and the Commission's Consumer Services Division.

Response:

NW Natural provides the following estimates in response to this data request. Note that the Company has used the actual high temperature or actual low temperature for each day because we do not record the forecasted high temperature or forecasted low temperature in our customer information system. In addition, NW Natural only stores temperature data by the weather zones that correspond with our service districts, as approved in our Oregon tariff Rule 24 Gas Quality Standards and Determination of Thermal Units. As a result, we provide the data by zone/district and not by county because these weather zones may cross counties; providing the response by weather zone/district is more efficient and does not require assumptions as to which weather zone to use for each county.

- a. Number of days a severe weather moratorium would be in effect under the proposed language for OAR 860-21-0407(1) of an actual temperature of 32 degrees or less. Please note data have been truncated to remove the months of May-September, as there were no daily data in those months meeting the criteria. As shown in the table below, moratorium days would have totaled 244 in

2019, 197 in 2020, and 159 in 2021. Please note that these totals are a simple sum of all the moratorium days for each weather zone and useful only for comparing the results of this response part a to the response to part b.

| | Proposed Rules | | | | | | | | |
|-------------|----------------|-----------|-----------|-----------|--------------|-----------|-----------|------------|------------|
| | Albany | Astoria | Coos Bay | Eugene | Lincoln City | Portland | Salem | The Dalles | Total |
| 2019 | 36 | 25 | 11 | 43 | 13 | 22 | 39 | 55 | 244 |
| 01 Jan | 7 | 3 | 0 | 9 | 1 | 3 | 7 | 8 | 38 |
| 02 Feb | 10 | 8 | 8 | 11 | 9 | 9 | 10 | 14 | 79 |
| 03 Mar | 7 | 5 | 2 | 6 | 2 | 4 | 6 | 10 | 42 |
| 04 Apr | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 |
| 10 Oct | 4 | 5 | 0 | 6 | 0 | 2 | 6 | 8 | 31 |
| 11 Nov | 2 | 2 | 0 | 4 | 1 | 0 | 3 | 5 | 17 |
| 12 Dec | 6 | 2 | 1 | 7 | 0 | 4 | 7 | 9 | 36 |
| 2020 | 33 | 18 | 6 | 33 | 15 | 18 | 33 | 41 | 197 |
| 01 Jan | 3 | 4 | 0 | 2 | 3 | 2 | 3 | 4 | 21 |
| 02 Feb | 8 | 4 | 5 | 10 | 4 | 5 | 12 | 10 | 58 |
| 03 Mar | 9 | 4 | 0 | 8 | 6 | 4 | 6 | 8 | 45 |
| 04 Apr | 1 | 2 | 0 | 1 | 1 | 0 | 1 | 2 | 8 |
| 10 Oct | 3 | 0 | 0 | 4 | 0 | 2 | 2 | 4 | 15 |
| 11 Nov | 3 | 1 | 1 | 3 | 1 | 2 | 3 | 5 | 19 |
| 12 Dec | 6 | 3 | 0 | 5 | 0 | 3 | 6 | 8 | 31 |
| 2021 | 25 | 23 | 3 | 25 | 15 | 10 | 20 | 38 | 159 |
| 01 Jan | 5 | 5 | 1 | 4 | 1 | 2 | 4 | 3 | 25 |
| 02 Feb | 4 | 4 | 0 | 5 | 2 | 3 | 4 | 8 | 30 |
| 03 Mar | 8 | 9 | 1 | 7 | 7 | 2 | 8 | 12 | 54 |
| 04 Apr | 1 | 1 | 0 | 2 | 2 | 0 | 1 | 2 | 9 |
| 10 Oct | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 1 | 3 |
| 11 Nov | 1 | 1 | 0 | 1 | 0 | 0 | 0 | 3 | 6 |
| 12 Dec | 5 | 3 | 1 | 5 | 3 | 3 | 3 | 9 | 32 |

- b. Number of days a severe weather moratorium would be in effect under the current language of OAR 860-21-0407(1) of a high actual temperature of 32 degrees or less. Please note data have been truncated to remove the months of May-September, as there were no daily data in those months meeting the criteria. As shown in the table below, moratorium days would have totaled 6 in 2019, 1 in 2020, and 4 in 2021. Please note that these totals are a simple sum of all the moratorium days for each weather zone and useful only for comparing the results of this response part b to the response to part a.

| | Current Rules | | | | | | | | |
|-------------|---------------|----------|----------|----------|--------------|----------|----------|------------|----------|
| | Albany | Astoria | Coos Bay | Eugene | Lincoln City | Portland | Salem | The Dalles | Total |
| 2019 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 6 |
| 01 Jan | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 02 Feb | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 | 4 |
| 03 Mar | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 2 |
| 04 Apr | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 10 Oct | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 11 Nov | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 12 Dec | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2020 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 |
| 01 Jan | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 |
| 02 Feb | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 03 Mar | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 04 Apr | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 10 Oct | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 11 Nov | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 12 Dec | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2021 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 3 | 4 |
| 01 Jan | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 02 Feb | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 03 Mar | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 04 Apr | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 10 Oct | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 11 Nov | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 12 Dec | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 3 | 4 |

An additional view of the impact of the proposed rule change would be to look at the days available for field collections without a moratorium both under the current and proposed rules. The following table provides this comparison, with heat mapping format used to illustrate the impact of the proposed rules. This table shows, for example, that in January 2019 the Portland weather zone would have had 14 days available for field collections under the proposed rules versus 17 days under the current rules, illustrating how the proposed rule would restrict the number of days available for field collections. For an extreme example, note that in February 2019, The Dalles zone would have had only one day available out of the entire month for field collections under the proposed rules versus having 11 days under the current rules.

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NWN Response
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| Days Available for Field Collection Not Under a Moratorium | | | | | | | | | | | | | | | | |
|--|---------------|---------|----------|--------|--------------|----------|-------|------------|----------------|---------|----------|--------|--------------|----------|-------|------------|
| Row Label: | Current Rules | | | | | | | | Proposed Rules | | | | | | | |
| | Albany | Astoria | Coos Bay | Eugene | Lincoln City | Portland | Salem | The Dalles | Albany | Astoria | Coos Bay | Eugene | Lincoln City | Portland | Salem | The Dalles |
| 2019 | | | | | | | | | | | | | | | | |
| 01 Jan | 17 | 17 | 17 | 17 | 17 | 17 | 17 | 17 | 10 | 14 | 17 | 8 | 16 | 14 | 10 | 9 |
| 02 Feb | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 11 | 5 | 7 | 7 | 4 | 6 | 6 | 5 | 1 |
| 03 Mar | 16 | 16 | 16 | 16 | 16 | 16 | 16 | 14 | 9 | 11 | 14 | 10 | 14 | 12 | 10 | 6 |
| 04 Apr | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 17 |
| 10 Oct | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 14 | 13 | 18 | 12 | 18 | 16 | 12 | 10 |
| 11 Nov | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 11 | 11 | 13 | 9 | 12 | 13 | 10 | 8 |
| 12 Dec | 14 | 14 | 14 | 14 | 14 | 14 | 14 | 14 | 8 | 12 | 13 | 7 | 14 | 10 | 7 | 5 |
| 2020 | | | | | | | | | | | | | | | | |
| 01 Jan | 16 | 16 | 16 | 16 | 16 | 16 | 16 | 15 | 13 | 12 | 16 | 14 | 13 | 14 | 13 | 12 |
| 02 Feb | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 7 | 11 | 10 | 5 | 11 | 10 | 3 | 5 |
| 03 Mar | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 9 | 14 | 18 | 10 | 12 | 14 | 12 | 10 |
| 04 Apr | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 17 | 16 | 18 | 17 | 17 | 18 | 17 | 16 |
| 10 Oct | 16 | 16 | 16 | 16 | 16 | 16 | 16 | 16 | 13 | 16 | 16 | 12 | 16 | 14 | 14 | 12 |
| 11 Nov | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 10 | 12 | 12 | 10 | 12 | 11 | 10 | 8 |
| 12 Dec | 16 | 16 | 16 | 16 | 16 | 16 | 16 | 16 | 10 | 13 | 16 | 11 | 16 | 13 | 10 | 8 |
| 2021 | | | | | | | | | | | | | | | | |
| 01 Jan | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 10 | 10 | 14 | 11 | 14 | 13 | 11 | 12 |
| 02 Feb | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 11 | 11 | 15 | 10 | 13 | 12 | 11 | 7 |
| 03 Mar | 19 | 19 | 19 | 19 | 19 | 19 | 19 | 19 | 11 | 10 | 18 | 12 | 12 | 17 | 11 | 7 |
| 04 Apr | 17 | 17 | 17 | 17 | 17 | 17 | 17 | 17 | 16 | 16 | 17 | 15 | 15 | 17 | 16 | 15 |
| 10 Oct | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 14 | 15 | 15 | 14 | 15 | 15 | 15 | 14 |
| 11 Nov | 14 | 14 | 14 | 14 | 14 | 14 | 14 | 14 | 13 | 13 | 14 | 13 | 14 | 14 | 14 | 11 |
| 12 Dec | 15 | 14 | 15 | 15 | 15 | 15 | 15 | 12 | 10 | 12 | 14 | 10 | 12 | 12 | 12 | 6 |

PacifiCorp Attachment OPUC 1

a. Please provide the number of days a severe weather moratorium would be in effect due by a forecasted less than 32 degrees. (Proposed language)

| County | January | | February | | March | | April | | May | | June | | July | | August | | September | | October | | November | | December | | Totals | |
|---------------|------------|------------|------------|------------|------------|------------|------------|------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------|------------|------------|------------|------------|------------|-------------|-------------|
| | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 |
| BENTON | 2 | 6 | 12 | 4 | 10 | 9 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 | 1 | 3 | 2 | 5 | 8 | 36 | 26 |
| CROOK | 11 | 12 | 14 | 12 | 16 | 19 | 8 | 11 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 4 | 8 | 11 | 16 | 14 | 81 | 71 |
| DESCHUTES | 13 | 14 | 14 | 15 | 18 | 19 | 10 | 16 | 6 | 5 | 3 | 6 | 0 | 1 | 0 | 1 | 2 | 2 | 10 | 8 | 9 | 10 | 17 | 16 | 102 | 99 |
| DOUGLAS | 15 | 15 | 14 | 15 | 18 | 19 | 14 | 16 | 6 | 7 | 0 | 1 | 1 | 0 | 2 | 0 | 1 | 2 | 8 | 7 | 8 | 12 | 19 | 17 | 106 | 96 |
| GILLIAM | 5 | 4 | 10 | 7 | 9 | 11 | 1 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 | 0 | 7 | 5 | 7 | 10 | 43 | 35 |
| HOOD RIVER | 11 | 13 | 14 | 14 | 17 | 17 | 4 | 6 | 2 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5 | 4 | 8 | 10 | 15 | 14 | 76 | 67 |
| JACKSON | 16 | 14 | 15 | 15 | 17 | 19 | 12 | 16 | 6 | 9 | 2 | 1 | 3 | 1 | 3 | 0 | 0 | 4 | 6 | 11 | 12 | 11 | 19 | 18 | 111 | 105 |
| JEFFERSON | 11 | 13 | 15 | 11 | 14 | 17 | 10 | 11 | 5 | 4 | 0 | 12 | 0 | 9 | 0 | 7 | 0 | 6 | 7 | 11 | 9 | 15 | 15 | 14 | 86 | 117 |
| JOSEPHINE | 16 | 15 | 15 | 15 | 18 | 19 | 18 | 17 | 15 | 16 | 18 | 18 | 18 | 17 | 17 | 18 | 17 | 17 | 17 | 16 | 14 | 16 | 19 | 18 | 202 | 187 |
| KLAMATH | 16 | 15 | 15 | 15 | 18 | 19 | 18 | 17 | 11 | 15 | 7 | 6 | 5 | 0 | 0 | 8 | 11 | 13 | 16 | 15 | 14 | 15 | 19 | 18 | 150 | 141 |
| LAKE | 15 | 14 | 15 | 14 | 16 | 19 | 11 | 13 | 4 | 6 | 3 | 2 | 0 | 0 | 0 | 0 | 0 | 3 | 5 | 5 | 8 | 8 | 19 | 16 | 96 | 86 |
| LANE | 2 | 7 | 12 | 5 | 9 | 10 | 1 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 5 | 1 | 6 | 3 | 10 | 6 | 45 | 32 |
| LINN | 12 | 13 | 15 | 14 | 16 | 19 | 10 | 12 | 3 | 2 | 0 | 0 | 0 | 8 | 0 | 0 | 1 | 0 | 6 | 4 | 8 | 9 | 18 | 14 | 89 | 82 |
| MARION | 2 | 3 | 10 | 3 | 6 | 9 | 0 | 5 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 0 | 5 | 5 | 9 | 6 | 35 | 29 |
| MULTNOMAH | 2 | 2 | 4 | 3 | 3 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 1 | 0 | 5 | 5 | 17 | 11 |
| POLK | 5 | 4 | 8 | 4 | 9 | 9 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 1 | 2 | 1 | 6 | 8 | 33 | 25 |
| SHERMAN | 7 | 11 | 10 | 11 | 12 | 11 | 8 | 5 | 1 | 0 | 0 | 1 | 0 | 2 | 0 | 1 | 0 | 0 | 3 | 3 | 8 | 9 | 14 | 15 | 63 | 58 |
| UMATILLA | 10 | 12 | 14 | 12 | 16 | 16 | 9 | 13 | 4 | 1 | 0 | 0 | 0 | 4 | 0 | 3 | 0 | 3 | 5 | 7 | 9 | 11 | 17 | 14 | 84 | 84 |
| WALLOWA | 15 | 15 | 15 | 15 | 17 | 19 | 13 | 15 | 5 | 6 | 0 | 1 | 0 | 0 | 0 | 1 | 2 | 7 | 8 | 7 | 12 | 13 | 19 | 17 | 106 | 101 |
| WASCO | 10 | 13 | 14 | 12 | 15 | 15 | 9 | 11 | 3 | 2 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 6 | 7 | 8 | 8 | 16 | 14 | 82 | 71 |
| Totals | 196 | 215 | 255 | 216 | 274 | 298 | 156 | 197 | 73 | 75 | 34 | 49 | 27 | 42 | 22 | 39 | 34 | 59 | 129 | 112 | 159 | 174 | 284 | 262 | 1643 | 1523 |

b. Please provide the number of days a severe weather moratorium would be in effect due to high temperature of 32 degrees. (Current language)

| County | January | | February | | March | | April | | May | | June | | July | | August | | September | | October | | November | | December | | |
|---------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|-----------|----------|----------|----------|----------|----------|----------|----------|---|
| | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | 2020 | 2021 | |
| BENTON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| CROOK | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| DESCHUTES | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| DOUGLAS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| GILLIAM | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| HOOD RIVER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| JACKSON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| JEFFERSON | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| JOSEPHINE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| KLAMATH | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| LAKE | 2 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| LANE | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LINN | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MARION | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MULTNOMAH | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| POLK | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SHERMAN | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| UMATILLA | 2 | 2 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 2 |
| WALLOWA | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| WASCO | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Totals | 7 | 2 | 3 | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 6 | |

August 19, 2022

To: Melissa Nottingham
Public Utility Commission of Oregon

From: Robert Macfarlane
Manager, Pricing and Tariffs

Portland General Electric Company
AR 653
PGE Response to OPUC Information Request 01
Dated July 29, 2022

Request:

- (1) Please provide the number of business days a severe weather moratorium would be triggered by the 32-degree temperature threshold under the current language and the proposed changes to 860-21-0407 (1). Please provide the data by year (2020 and 2021) and county.
 - a. Please provide the number of days a severe weather moratorium would be in effect due by a forecasted less than of 32 degrees. (Proposed language)
 - b. Please provide the number of days a severe weather moratorium would be in effect due to a high temperature of 32 degrees. (Current language)

Please exclude days covered under 860-021-0320:

Disconnection of Service on Weekends and Holidays

Utility service shall not be disconnected for nonpayment on a weekend or a state- or utility-recognized holiday. Utility service shall not be disconnected for nonpayment on a Friday or the day before a state- or utility-recognized holiday unless mutually agreed upon by the customer, utility, and the Commission's Consumer Services Division.

Response:

Table 1 below details the number of days in 2019-2021 that would have been triggered by a severe weather moratorium under the current language, "any day a high temperature of less than 32 degrees is forecasted," and under the proposed language, "any day a temperature of less than 32 degrees is forecasted." These counts, shown for each non-summer month, are incremental to the number of days when disconnection for non-payment would be disallowed under 860-021-0320, per request. Table 2 provides the number of available days per month that would have been eligible for non-payment disconnections under the current and proposed language.

PGE provides an additional year of data (2019) to show a broader range of impacts, as 2019 was colder than the past two years. Data responses are provided by weather station rather than county, reflecting Portland General Electric's (PGE) standard weather data. Furthermore, since PGE does not store forecasted temperature values, actual temperature values are used as a proxy.

AR 653 PGE Response to OPUC Information Request 01

August 19, 2022

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Table 1. Days triggered by a severe weather moratorium under current and proposed language, by month, 2019-2021

| | Days disallowed by 860-021-0320 | Severe Weather Moratorium Days under Current Language | | | | Severe Weather Moratorium Days under Proposed Language | | | |
|-------------------------------|---------------------------------|---|----------|-----------|-----------|--|-----------|-----------|-----------|
| | | Portland | Salem | Troutdale | Hillsboro | Portland | Salem | Troutdale | Hillsboro |
| 2021 | 97 | 0 | 1 | 0 | 1 | 10 | 13 | 19 | 31 |
| Jan | 16 | 0 | 0 | 0 | 0 | 2 | 1 | 4 | 3 |
| Feb | 13 | 0 | 0 | 0 | 0 | 3 | 2 | 4 | 5 |
| Mar | 12 | 0 | 0 | 0 | 0 | 1 | 4 | 7 | 10 |
| Apr | 13 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 3 |
| Oct | 16 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| Nov | 14 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| Dec | 13 | 0 | 1 | 0 | 1 | 4 | 5 | 3 | 7 |
| 2020 | 96 | 0 | 0 | 0 | 0 | 12 | 17 | 30 | 37 |
| Jan | 15 | 0 | 0 | 0 | 0 | 0 | 3 | 3 | 4 |
| Feb | 14 | 0 | 0 | 0 | 0 | 3 | 7 | 11 | 11 |
| Mar | 13 | 0 | 0 | 0 | 0 | 2 | 3 | 5 | 9 |
| Apr | 12 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| Oct | 15 | 0 | 0 | 0 | 0 | 2 | 1 | 2 | 3 |
| Nov | 15 | 0 | 0 | 0 | 0 | 1 | 2 | 2 | 3 |
| Dec | 12 | 0 | 0 | 0 | 0 | 4 | 1 | 7 | 6 |
| 2019 | 97 | 0 | 0 | 0 | 0 | 19 | 16 | 35 | 35 |
| Jan | 14 | 0 | 0 | 0 | 0 | 3 | 1 | 5 | 8 |
| Feb | 13 | 0 | 0 | 0 | 0 | 9 | 9 | 9 | 9 |
| Mar | 15 | 0 | 0 | 0 | 0 | 4 | 3 | 5 | 4 |
| Apr | 12 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Oct | 13 | 0 | 0 | 0 | 0 | 1 | 1 | 6 | 5 |
| Nov | 16 | 0 | 0 | 0 | 0 | 0 | 1 | 3 | 3 |
| Dec | 14 | 0 | 0 | 0 | 0 | 2 | 1 | 7 | 6 |
| Annual Ave (2019-2021) | 97 | 0 | 0 | 0 | 0 | 14 | 15 | 28 | 34 |

AR 653 PGE Response to OPUC Information Request 01

August 19, 2022

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Table 2. Available days for disconnection under current and proposed language, by month, 2019-2021

| | Available Days for Disconnection under Current Language | | | | Available Days for Disconnection under Proposed Language | | | |
|-------------------------------|---|------------|------------|------------|--|------------|------------|------------|
| | Portland | Salem | Troutdale | Hillsboro | Portland | Salem | Troutdale | Hillsboro |
| 2021 | 200 | 199 | 200 | 199 | 190 | 187 | 181 | 169 |
| Jan | 15 | 15 | 15 | 15 | 13 | 14 | 11 | 12 |
| Feb | 15 | 15 | 15 | 15 | 12 | 13 | 11 | 10 |
| Mar | 19 | 19 | 19 | 19 | 18 | 15 | 12 | 9 |
| Apr | 17 | 17 | 17 | 17 | 17 | 16 | 16 | 14 |
| Oct | 15 | 15 | 15 | 15 | 15 | 15 | 15 | 14 |
| Nov | 16 | 16 | 16 | 16 | 16 | 16 | 16 | 14 |
| Dec | 18 | 17 | 18 | 17 | 14 | 13 | 15 | 11 |
| 2020 | 202 | 202 | 202 | 202 | 190 | 185 | 172 | 165 |
| Jan | 16 | 16 | 16 | 16 | 16 | 13 | 13 | 12 |
| Feb | 15 | 15 | 15 | 15 | 12 | 8 | 4 | 4 |
| Mar | 18 | 18 | 18 | 18 | 16 | 15 | 13 | 9 |
| Apr | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 17 |
| Oct | 16 | 16 | 16 | 16 | 14 | 15 | 14 | 13 |
| Nov | 15 | 15 | 15 | 15 | 14 | 13 | 13 | 12 |
| Dec | 19 | 19 | 19 | 19 | 15 | 18 | 12 | 13 |
| 2019 | 199 | 199 | 199 | 199 | 180 | 183 | 164 | 164 |
| Jan | 17 | 17 | 17 | 17 | 14 | 16 | 12 | 9 |
| Feb | 15 | 15 | 15 | 15 | 6 | 6 | 6 | 6 |
| Mar | 16 | 16 | 16 | 16 | 12 | 13 | 11 | 12 |
| Apr | 18 | 18 | 18 | 18 | 18 | 18 | 18 | 18 |
| Oct | 18 | 18 | 18 | 18 | 17 | 17 | 12 | 13 |
| Nov | 14 | 14 | 14 | 14 | 14 | 13 | 11 | 11 |
| Dec | 17 | 17 | 17 | 17 | 15 | 16 | 10 | 11 |
| Annual Ave (2019-2021) | 200 | 200 | 200 | 200 | 187 | 185 | 172 | 166 |

AR 653

Formal Rulemaking Round 2 Comments of the Joint Utilities

Attachment B

Redline Adjustments Proposed by the Joint Utilities for Clarity and Consistency

OAR 860-021-0008, Definitions for Regulation of Utility Services

(7) "Low-income residential customer" means a customer ~~or applicant~~ whose eligibility has been verified under OAR 860-021-0180.

Recommend removing the word applicant from the definition. Customers and applicants are specifically different terms, and an applicant should not be considered a customer. Except for charging a deposit or reconnect fee to an applicant, all of Division 21's low-income protections are for customers. Additionally, the proposed rule changes include a requirement that the utility must allow an application for verification as a low-income customer (OAR 860-021-0328) and OAR 860-021-0180 allows that applicant to self-attest to being low income, which then means we would not charge a deposit or reconnection fee, in qualifying instances, for a low-income applicant's connection or reconnection of service.

OAR 860-021-0180, Verification of Eligibility for Low-Income

(1) A residential customer shall qualify as an eligible low-income residential customer for purposes of OAR 860-021-0205(5), OAR 860-021-0210, OAR 860-021-0330 or OAR 860-021-0420 through the following methods:

- (a) The customer is a recipient within at least the past 12 months of energy assistance through the Low-Income Home Energy Assistance Program (LIHEAP), ~~or~~ the Oregon Energy Assistance Program (OEAP) or an energy assistance program offered by an energy utility; or
- (b) The customer is enrolled in any of the utility's income-qualified energy assistance programs, including or qualifies to enroll in any program offered by a utility to residential customers based on differential energy burdens based on factors that affect affordability pursuant to ORS 757.230(1).

Recommend adding "within at least the past 12 months" to recognize that Energy Assistance isn't an ongoing status and that some time interval needs to be assumed. Also modified section (1)(b) to allow for low-income protections to be provided to customers who otherwise qualify to participate in a utility's HB 2475-related program.

OAR 860-021-0205, Deposit Payment Arrangements for Residential Energy Utility Service

(1) ~~W~~Except as provided in OAR 860-021-0335(1) and (2), when an energy utility requires a deposit, the customer or applicant may pay the deposit in full or in three installments. The first installment is due immediately; the remaining installments are due ~~30 days and 60 day~~ with the subsequent two monthly bills after the first installment payment. Except for the last payment, installments shall be the greater of \$30 or one-third of the deposit. **An energy utility shall not require a low-income residential customer to pay a deposit.**

The Joint Utilities support the proposed change but recommend the bolded language be moved and incorporated into OAR 860-021-0200, Establishing Credit for Residential Utility Service. As an example, the proposed clause at the end of 860-021-0200(2)(b), "or is a low-income residential customer," could be modified to, "or is a low-income residential customer who shall not be charged a deposit."

OAR 860-021-0215, Refund of Deposits for Residential and Nonresidential Utility Service

(6) An energy utility that collects or has collected a deposit from a low-income residential customer must apply or return the deposit as outlined in this section. For a low-income residential customer, the energy utility will return the deposit within two billing cycles.

- (a) The deposit will first be applied to any outstanding balance on a low-income residential customer's account. If there are any remaining funds, the funds will be applied to the customer's account or returned by electronic payment or check mailed to the last-known address,
- (b) If a low-income residential customer account is current, the deposit will be applied to a customer's account or returned by electronic payment or check mailed to the last-known address,

(c) For a low-income residential customer that pays the deposit in installments ~~per section (1) above as set forth in OAR 860-021-0205~~, the energy utility will return the deposit within two billing cycles, after the last installment payment is made.

Recommend modernizing adjustments to both 6(a) and 6(b) to allow for return of the deposit by electronic payment by adding "by electronic payment or" before "by check mailed to the last-known address". Additionally, section (6)(c)'s section reference has been clarified.

OAR 860-021-0305, Grounds for Disconnecting Utility Service

(3) When the customer fails to pay Oregon tariff~~ed~~ or price-listed charges due for services rendered.

OAR 860-021-0328, Reconnection of Residential Energy Utility Service

(3)(b) For a request for reconnection received anytime other than a Business Day, ~~e~~ Except as provided under section (6) of this rule, the request for reconnection must be treated as if it were received at 8:00 a.m. on the next Business Day and service must be restored in accordance with Subsection (3)(a)(A) of this rule.

Correction of typographical errors.

OAR 860-021-0335, Refusal of Utility Service

(1) Except as provided in section (2) of this rule and in OAR 860-021-0330, an energy utility may refuse to provide service to a customer or applicant until the utility receives full payment of any overdue amount of an Oregon tariffed or price-listed charge and any other like obligation related to an ~~Oregon~~ prior account.

Inclusion of "an Oregon" appears to be a typographical error and could be removed to align with similar verbiage within section (2) of this rule.

OAR 860-021-0405, Notice of Pending Disconnection of Residential Electric or Gas Utility Service

(11) When the energy utility makes personal contact under this rule, the utility's representative making contact ~~is~~ may be empowered to accept reasonable partial payment of the overdue balance under the time-payment provisions of OAR 860-021-0415. If an energy utility has a policy to not allow collections at the door, the utility representative shall attempt to notify the customer of methods to pay the outstanding balance or a reasonable partial payment to prevent disconnection. The energy utility shall delay disconnection, ~~as determined by the utility,~~ and notify the customer in such case that they have a minimum of 24 hours ~~for the customer~~ to contact the energy utility and make adequate payments.

Recommend the addition of commas around "as determined by the utility" for readability and the removal of the redundant "for the customer".

OAR 860-021-0406, Wildfire Displacement Protection

(4) An energy utility shall make best efforts to have information available on its website concerning wildfire displacement protections; and when practical, information from the energy utility that includes energy utility contact information shall be available at local emergency command centers, local ~~community-based~~ community-based organizations, and local media.

OAR 860-021-0407, Severe Weather Moratorium on Involuntary Disconnection of Residential and Small Commercial Electric or Gas Utility Service-for Nonpayment

(1) Except as set forth in section (~~4410~~) of this rule, an energy utility must put into effect a moratorium on the disconnection of residential service for nonpayment on any day a ~~high~~-temperature of less than 32 degrees

Fahrenheit is forecasted by the applicable weather reporting service or a winter storm warning indicating weather conditions pose a threat to life or property is issued by the applicable weather reporting service.

Corrected the section being referenced to within section (1).

OAR 860-021-0410, Emergency Medical Certificate for Residential Electric and Gas Service

(2) ~~The oral~~ Any oral certification by a qualified medical professional and any residential customer's initial self-certification, to the utility must be confirmed in writing within 4430 days by ~~the~~ a qualified medical professional prescribing medical care. Written certifications must include:

(6) If a medical certificate customer fails to enter into a written time-payment agreement within 20 days of filing the certificate, or to abide by its terms, the energy utility shall notify the Commission's Consumer Services Division of its intent to disconnect service and the reason for the disconnection. The energy utility may disconnect service after providing a notice ~~45-20~~ days in advance of disconnection for nonpayment, or five days before disconnection for failure to enter into a written time-payment agreement. The notice shall comply with the requirements of OAR 860-021-0405, except paragraph (2)(d)(C) shall not be applicable. A hearing may thereafter be held to determine whether the energy utility should be permitted to disconnect service to the customer.

Slightly tweaked section (2)'s verbiage for readability and updated the noticing timeline within section (6) to align with OAR 860-021-0405's requirements.

OAR 860-021-0415, Time-Payment Agreements for Residential Electric and Gas Service (Nonmedical Certificate Customers)

(5) ~~During the term of the time-payment agreement, a~~ customer whose financial condition changes during the term of a time-payment agreement, ~~and who defaults on a time-payment agreement and who~~ seeks to renegotiate ~~such time-payment agreements~~, may do so at least one time under the same terms specified above.

Streamlined this rule's verbiage for readability.

OAR 860-021-0420, Field Visit Charge

A Commission approved fee may be charged whenever an energy utility visits a residential service address intending to reconnect or disconnect service, but due to customer action, the energy utility is unable to complete the reconnection or disconnection at the time of the visit. An energy utility shall waive the first ~~filed~~ field-visit charge within a 12-month window to low-income residential customers.

Corrected a typo ("first filed" instead of "first field") and recommend adding "within a 12-month window" for clarity.

OAR 860-021-0505, Disconnection Procedures for All Commercial Electric and Gas Utility Customers and All Customers of Large Telecommunications Utilities

(5) The energy or large telecommunications utility must serve the notice of disconnection in person or send it by first class mail, or electronically, to the last known addresses of the customer and the customer's designated representative. Service is complete on the date of personal delivery, electronic transmittal, or, if service is by US Mail, on the day after the US Postal Service postmark or the day after the date of postage metering.