



February 19th, 2021

To: Oregon Public Utilities Commission

**RE: COVID-19 Utility Disconnection Moratorium**

Dear Chair Decker, Commissioner Tawney, and Commissioner Thompson,

We, the undersigned signatories, urge the Commission to extend Oregon's moratorium on utility disconnections beyond June 2021. As an alliance of culturally specific community-based organizations working to improve outcomes for communities of color, we are concerned about the impacts utility disconnections have on low-income Black, Indigenous, and people of color.

Numerous studies have shown that systemic social inequities make many racial groups particularly vulnerable to becoming infected with COVID-19. Native American, Asian, Black, and Latinx people are being hospitalized and dying from the virus at higher rates compared to white Americans in the United States. Yet, early research of vaccination rates at the national level has demonstrated that Black and Hispanic people are receiving the vaccines at lower rates.<sup>1</sup> These statistics simply reflect the disparities that result from deeply rooted, institutionalized systems of discrimination and racism.

In addition to shouldering the health impacts of the pandemic, people of color – Black and Latinx Americans, particularly – have seen the highest rates of job losses across the United States.<sup>2</sup> Again, these statistics do not exist in a vacuum – they are indicative of the systematic barriers communities of color face to accessing jobs, resources, health services, and opportunities.

Given the racial and class disparities of this public health crisis, it is imperative that crisis response be equitable, fair, and just. This means centering the needs of low-income, marginalized communities. This means focusing on the needs of those struggling to pay expenses for food, rent, medical services, utilities, transportation, and all the other costs of living. This also means ensuring that while families are still dealing with the real-time hits of a global pandemic that has caused widespread job loss, families are still able to heat their homes, keep their lights on, cook meals, power critical medical devices, and attend virtual classes.

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<sup>1</sup> Ndugga, Nambi et al. "Latest Data on COVID-19 Vaccinations Race/Ethnicity." *Kaiser Family Foundation*. February 18, 2021.

<https://www.kff.org/coronavirus-covid-19/issue-brief/latest-data-covid-19-vaccinations-cases-deaths-race-ethnicity/>

<sup>2</sup> Groeger, Lena V. "What Coronavirus Job Losses Reveal About Racism in America." *ProPublica*. July 20, 2020. <https://projects.propublica.org/coronavirus-unemployment/>

Further, people whose utilities are shut off or are threatened with disconnection often experience “stress, hunger, respiratory illness, and heat and fire risks” in addition to compromised early childhood health and development.<sup>3</sup> Shutoffs danger the lives of those on dialysis machines or oxygen machines, and of those who require medicines that must be refrigerated, such as insulin. In addition to protecting families from facing additional health hazards and mental health stress, housing protections such as utility shutoff moratoriums have also been proven to curb the spread of COVID-19.<sup>4</sup> Resuming utility shutoffs in the midst of this crisis is inhumane, unjust, and unsafe.

This crisis has caused immeasurable harm to all of us, but especially to those who were already on the social and economic margins. While some of this devastation can be captured by data, statistics, and research, much of the trauma and tragedy experienced over the past year and yet to be experienced in the aftermath of this crisis do not fit neatly within the axes of a graph, or on a spreadsheet. These are the stories, narratives, and realities of all of us, and of those who live them. It is our duty to put people before profits and center these tragedies as we respond to this emergency.

We strongly urge the Commission to consider alternative options to arrearage management and utility disconnections. PUC staff have expressed their belief that the threat of utility shutoffs will spur residents to seek utility bill assistance programs. While we understand the concerns with allowing customer debt to accrue, we firmly reject the notion that this is the only way to encourage participation in assistance programs. There are many reasons for a family to be deterred from seeking this assistance – distrust of the state agencies responsible for managing bills and lack of clear information regarding existing debt or match requirements are possible reasons. By extending the utility shutoff moratorium, the Commission, its staff, and communities will have more time to collaborate to craft equitable, trauma-informed solutions to the barriers faced by many in accessing these programs, and to consider other strategies, such as debt forgiveness. Pressuring households with shutoff notices, however, is not a solution.

**We urge the Commission to extend the utility disconnection moratorium to April 2022, or January 2022 at the earliest, with opportunity to extend.** While we believe access to electricity and healthy, safe living conditions are basic human rights and should never be disconnected for households unable to keep up with payments, these disconnections should certainly not happen in the wake of a deadly global pandemic. Continuing utility shutoffs this year does not allow low-income Oregonians adequate time to get back on their feet, but would rather harm these households the most. Further, we cannot be certain how long it will take for

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<sup>3</sup> “Living Without Power: Health Impacts of Utility Shutoffs in California.” *The Utility Reform Network*. [https://downloads.cfassets.net/ntcn17ss1ow9/2AXQK5L\\_v4gwQkgD88IAGDY/f9b42f76d4d3bde79c4e84060bce9710/2018\\_TURN\\_Shut-Off-Report\\_FINAL.pdf](https://downloads.cfassets.net/ntcn17ss1ow9/2AXQK5L_v4gwQkgD88IAGDY/f9b42f76d4d3bde79c4e84060bce9710/2018_TURN_Shut-Off-Report_FINAL.pdf)

<sup>4</sup> Jowers, et al. “Policy in the Pandemic: Housing Security Policies Reduce U.S. Covid-19 Infection Rates.” *Nicholas Institute, Duke University*. June 29, 2020. <https://nicholasinstitute.duke.edu/articles/policy-pandemic-housing-security-policies-reduce-us-covid-19-infection-rates>

people to recover from the hardship caused by the pandemic. We cannot assume that people's lives will return to normal this summer, or even this year. Ensuring that they can still be connected to electricity in their homes throughout this year will provide families with peace of mind as we recover and rebuild.

Sincerely,

Coalition of Communities of Color  
Asian Pacific American Network of Oregon  
Slavic and Eastern European Center  
Immigrant and Refugee Community Organization  
Pacific Islander and Asian Family Center  
Africa House  
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