



September 28, 2021

Public Utility Commission of Oregon
Attention: Mike Dougherty
201 High Street SE, Suite 100
Salem, OR 97301-1088

Re: UM 2114 Investigation in the Effects of the COVID-19 Pandemic on Utility Customers

Dear Mr. Dougherty:

Avista Utilities, Cascade Natural Gas, Idaho Power Company, Northwest Natural, Pacific Power, and Portland General Electric Company, collectively the Joint Utilities, welcome the opportunity to offer comments in preparation for the September 30th workshop that will discuss continued residential customer protections, including reconnect fees, late payment fees, service disconnections & same day reconnections, and self-certification of Medical Certificates, amongst other topics. The following are the Joint Utilities' responses to the specific paragraphs of the approved Stipulation¹ that will be discussed at the workshop:

¶11. Utilities will not apply service disconnection and reconnection fees to residential customers until October 1, 2022. Utilities may include associated costs in deferral tracking as described below. Parties agree to confer in good faith on or about October 1, 2021 to determine whether to request that the Commission modify the October 1, 2022 end date.

Response: First, and most important, disconnections have been and will continue to be a last resort for customers who are unable to pay their energy bill. With the extended consumer protections and energy assistance in place, including extended payment arrangements, Arrearage Management Programs, additional LIHEAP funding available, most customers behind on their energy bill should not find themselves in a position of facing potential disconnection.

With disconnections resuming on or after August 1st utilities are not charging disconnection or reconnection fees. Although the utilities are allowed to defer these foregone fees per paragraph 25(d), which all customers will eventually pay for, at some point charging the fees to the customers that caused them (cost causation principle) must resume. The Joint Utilities support sunseting the moratorium on these fees prior to October 1, 2022, and believe a date of April 1, 2022 is reasonable, to ensure continued protection through the upcoming winter heating season. By

¹ UM 2114, Settlement Stipulation approved by Order No. 20-401, entered into on November 5, 2020.

waiting until October 1, 2022 to resume charging these fees, it continues to add cost pressure to all other customers.

¶12. Utilities will not accrue and collect late payment fees, interest, and penalties for all residential customers retroactive to the date of the start of the Utility's disconnect moratorium and through October 1, 2022. Utilities may include associated costs in deferral tracking as described below. Parties agree to confer in good faith on or about October 1, 2021 to determine whether to request that the Commission modify the October 1, 2022 end date.

Response: Similar to the response to paragraph 11 above, the collection of late payment fees, interest, and penalties must resume at some point. The Joint Utilities support not resuming charging these fees until after the winter heating season on April 1, 2022. By waiting until October 1, 2022 to resume charging these fees, it continues to add cost pressure to all other customers.

¶13. Service disconnections for non-payment will be limited between the hours of 8:00 a.m. and 2:00 p.m. to facilitate responsive, same-day reconnection of service through October 1, 2022. Utilities will endeavor to reconnect customers on the same day of disconnections if opportunity and time allows for same day reconnections. Parties agree to confer in good faith on or about October 1, 2021 to determine whether to request that the Commission modify the October 1, 2022 end date.

Response: The Joint Utilities support the continuation of this customer protection through October 1, 2022.

¶16. The Utilities will allow initial self-certification of customer medical certificates when a medical certificate is required and allow customers two months to submit confirming certification from a qualified medical professional through October 1, 2022. The Parties agree to confer in good faith on or about October 1, 2021 to determine whether to request that the Commission modify the October 1, 2022 end date.

Response: The Joint Utilities support the continuation of this customer protection through October 1, 2022.

The Joint Utilities look forward to participating in the upcoming workshop.

Sincerely,

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

/s/Connie Aschenbrenner
Connie Aschenbrenner
Rate Design Manager
Idaho Power

/s/Mike Parvinen
Mike Parvinen
Manager, Regulatory Affairs
Cascade Natural Gas

/s/Natasha Siores
Natasha Siores
Manager, Rates & Regulatory Affairs
Northwest Natural Gas

/s/Melissa Nottingham
Melissa Nottingham
Manager, Regulation & Customer Advocacy
PacifiCorp

/s/ Jay Tinker
Jay Tinker
Director, Rates & Regulatory Affairs
Portland General Electric Company