

To: puc.publiccomments@state.or.us; PUC.FILINGCENTER@puc.oregon.gov
Re: UM 2114 COVID-19 Pandemic Impacts—6/13/21 Special Public Mtg Public
Comment of SBUA

Date: 7/13/21

By: Diane Henkels diane@utilityadvocates.org and Eli Pite eli@utilityadvocates.org

Small Business Utility Advocates (“SBUA”) is very pleased to see that Oregon Public Utility Commission (“Commission”) Staff recommends protecting small commercial customers affected by wildfire or certain hazardous air qualities from disconnection.¹ Additionally, we appreciate the advocacy of the Joint Comments from Community Advocates with regard to those concerns. SBUA seeks to support a fair Commission COVID-19 process by making it fair for small businesses, including small business utility customers. These businesses are key utility consumers, the economic engine of the state, and they provide jobs for the state’s residents.

As the pandemic and its variants continue the cause for measures and concern, SBUA continues to advocate for a small commercial customer-focused workshop to impacts of the COVID-19 Pandemic on small commercial customers, mitigation of these impacts, and data regarding these topics. We kindly request the Commission to consider the request once more and base this request on PUC COVID-19 reported data and information, including the following:

1. Given a six-month reporting, we still see substantial across the board increases, compared with January 2020, of total arrearage amounts, average number of customers in arrears, and average arrears per customer.
2. There are some large drops in numbers indicating avenues of mitigation to explore further.
3. There is some leveraging of federal pandemic aid in reducing arrearages with some utilities working with local government, and recent opportunity through America Rescue Plan Act (“ARPA”), as an example, for more similar mitigation.
4. Minimizing impact from the pandemic should reduce potential impact on future rates in each of the utilities.

Some trends for small commercial arrears are encouraging. However, SBUA remains concerned with present burdens of arrearages and late fees that press on our small businesses now and other costs that will be included potentially in future rate cases with the different utilities. A small commercial-focused workshop would provide benefits for all customers, not just small commercial ones.

Respectfully submitted.

¹ Regarding the standard applied to determine air quality SBUA hopes the reason that the federal Environmental Protection Agency standard is used over the Oregon Department of Environmental Quality standard available at: <https://oraqi.deq.state.or.us/home/map> SBUA does not express a scientific basis for its question but just that the DEQ source has been used in other contexts SBUA has observed.