



SBUA Public Comment on Commission Staff Report on UM 2114 2/23/21

During negotiations of the COVID-19 Stipulation, SBUA advocated, based on expert opinion, for similar treatment of small commercial customers and residential customers.¹ Since the last Commission COVID-19 focused public meeting, Commission and other data show that small commercial customers continue to get hammered during the pandemic and that the Commission has opportunity to fairly support more Oregon's second largest customer group. At a minimum, SBUA encourages the Commission to request more collaboration to address the large electric and natural gas arrearages accumulating on small commercial customer accounts. SBUA also welcomes opportunity to revise the Stipulation to include small commercial customers in extended moratoria, arrearage management plans, time payment plans.

With the data received and posted by the Commission in February 2021 SBUA notes that the percentage increases of arrears among small commercial customers that are 90+ days in arrears are perhaps the most dramatic impact of all the data received. SBUA has been unable to fully review in detail the Staff Report describing the data but SBUA notes as what may be misleading in Staff's Report on page 25 seeming to indicate there are 46,807 small commercial customers in PacifiCorp Oregon territory.² SBUA has learned from workshops and its members that utilities are approaching the small commercial customers in varied ways some positive, though there are disconnections and notices going out. Re the disconnection and notices, SBUA reiterates its support for treating small commercial customers similarly to residential. Even if a business will not be disconnected it is stressful to receive these notices at already stressful times. Regarding positive measures, SBUA appreciates these and emphasizes that these efforts must be greatly increased. It would be unfair and unreasonable for Oregon utilities to recover from bad debt associated with COVID-19 associated arrearages from small commercial customers where no or little means were employed to eliminate the arrearage.

Providing some comparative and contrasting data to the Staff Report regarding impact and recovery.³ Data-based reports show that COVID-19 continues to take a toll on the small

¹ See <https://www.oregon.gov/puc/utilities/Pages/COVID-19-Impacts.aspx> including SBUA comments and SBUA comments regarding the Stipulation and why SBUA did not sign on: <https://edocs.puc.state.or.us/efdocs/HAC/um2114hac172244.pdf>

² UM 2114 2/23/21 Staff Report p25 — the UE 374 General Rate Revision docket showed approximately 83,000 small commercial customers.

³ UM 2114 Staff Report 2/23/21 https://oregonpuc.granicus.com/MetaViewer.php?view_id=2&event_id=580&meta_id=28709, (herein "Staff Report" p 21



business in Oregon and elsewhere. Staff looks to sources to indicate a leveling off of impact⁴ and there are some positive points with some opening of business venues. But, SBUA agrees with other stakeholders commenting that it is too soon to read recovery is here in this COVID-19 impacts docket. SBUA provides links to sources for more data concerning COVID-19 impacts and recovery nationally⁵ and also state-wide.⁶ It is important to point out that the assistance reported by Staff to assist small business from federal assistance like the Payroll Protection Plan (“PPP”), is well-known to have benefitted larger businesses in the 2020.⁷

SBUA asks the Commission to incorporate the COVID-19 data fairly into its decisions in this docket. The State of Washington included small commercial with the residential customers in moratorium and continue to do so in the recent Order extension.⁸ SBUA encourages the Commission to take a similar approach as that state with regard, **at a minimum**, to arrearages of small commercial customers, “We also expect the Joint Utilities to reach out to new community partners to explore additional ways to communicate with hard-to-reach customers, to remove barriers that prevent customer engagement, and to facilitate the process for eligible customers to obtain financial assistance.”⁹

⁴ Oregon Office of Economic Activity Forecast <https://www.oregon.gov/das/OEA/Documents/forecast1220.pdf>

⁵ http://www.nativenationevents.org/wp-content/uploads/2021/02/covid-19-white-paper-february-update.pdf?vgo_ee=yosvU%2FOAv%2FwskcEPzzRFjvTlsI6OZFyrxAFQ92E55k%3D. For data capturing important nuanced information regarding COVID-19 impacts and recovery, see “Other Industry Sectors” beginning at page 34 (c.f. “As previously noted, outdoor activities, including hunting and fishing, have enjoyed a new spike in interest due to the greater perceived safety of being outdoors and the lack of many indoor recreation options. That spike has not been enough, however, to compensate for the difficulties in the agriculture sector and the loss of interstate and international travel, both of which provide important hunting and fishing demand.”)

⁶ The E2 Report reminds us of the significant role of small business in Oregon’s utility and energy sector and the impact of COVID-19, p1: https://e2.org/wp-content/uploads/2021/02/E2-Clean-Jobs-Oregon_February-2020.pdf. E2 shares the example that 10% of the state’s clean energy workforce pre-COVID was out of work at the beginning of 2021.

⁷ Due to shortage in time from the time Staff released its report for this meeting, this report is not yet available to SBUA but SBUA commits to furnishing a report with this information.

⁸ WUTC, In the Matter of Response to the COVID-19 Pandemic, DOCKET U-200281 ORDER 02 Extending Suspension of Disconnection of Energy Services for Nonpayment and Adopting Related Requirements and WUTC Staff’s Second Revised Term Sheet. <https://www.utc.wa.gov/docs/Pages/DocketLookup.aspx?FilingID=U-200281> (last accessed 2/23/21).

⁹ Id. Also see Staff Report p 25 regarding further federal recovery assistance, but note the 2021 State of Oregon Legislature contemplating bills re taxation of PPP and unemployment.



Washington has recently revised its moratoria and the Commission and utilities, and other stakeholders, should consider how to incorporate this fairness into treatment of the small commercial customer. SBUA commits to continuing to support the small commercial customers of public utilities regulated by the Commission in the midst of the COVID-19 public health crisis.

Respectfully submitted,

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