



Portland General Electric Company
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204
portlandgeneral.com

June 15, 2021

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

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

Dear Filing Center:

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 June 23 workshop that will discuss “specific characteristics to identify customers that should receive special protection against energy disconnections, and the circumstances under which such protections should be provided.”¹

Below are the Joint Utilities’ recommendations for accounts that would not be eligible for disconnection based on Staff’s recommendation in Order No. 21-164. Past due customers that fall into these criteria would still receive a disconnection notice unless the customer has set-up an arrangement that would suppress the notice. Each utility may provide additional flexibility based on unique circumstances in each utility’s service area.

- Accounts that will be excluded from disconnection on a monthly basis through December 2021:
 - Actively enrolled in an AMP matching program and have made one or more payments since enrollment;
 - On a time-payment arrangement (TPA) or renegotiated TPA and making payments;
 - Not on a TPA but have made a payment in the past month of at least 10% of the past due balance;
 - Have an appointment/seeking energy assistance;
 - Will allow disconnection to be canceled for one month if customer has communicated they have an appointment or has been calling to receive an

¹ OPUC Order # 21-164, pg. 3. <https://apps.puc.state.or.us/orders/2021ords/21-164.pdf>

application with energy assistance. If the customer needs additional time outside of the one month, the utility will work with the customer on a case by case basis; or

- Have an active medical certificate.

We look forward to participating in the upcoming workshops.

Sincerely,

/s/ Jay Tinker

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

JT/np

cc: Michael Dougherty, OPUC
Shawn Bonfield, Avista Utilities
Patrick Ehrbar, Avista Utilities
Michael Parvinen, Cascade Natural Gas
Connie Aschenbrenner, Idaho Power Company
Zachary Kravitz, Northwest Natural
Etta Lockey, Pacific Power