

September 07, 2022

Oregon Public Utility Commission (PUC)

Via e-mail only to: PUC.FILINGCENTER@puc.oregon.gov

Copy PUC Staff and counsel Michael Dougherty (Lead), Ezell Watkins, Michele Scala, Mark Brown, Johanna Riemenschneider

RE: UM 2114 Final Formal Comments of SBUA re the Revision of Division 21 Rules

SBUA would like to take this opportunity to thank all the participants involved in the process of this rulemaking that will have such profound effects on utility customers. As the stipulation agreement that was set forth by the PUC to investigate the effects of the COVID-19 pandemic on utility customers is set to expire on October 1st, 2022, SBUA notes and appreciates the Commission's role in ensuring the strengthening of customer protections through the revision of Division 21 rules.

The inclusion of the word, "small commercial" in some of the provisions of these revisions demonstrates to SBUA, the Commission's intention to assure that small business customers are being treated fairly in utility regulations with inclusive language as well as their analysis on the impacts small businesses face regarding extreme weather and natural disasters. Furthermore, SBUA believes this progress is further showcased in such revisions such as the Disconnect Reporting Rule by including reporting on small commercial customer disconnections. Such considerations by the Commission show progress to SBUA on small businesses being afforded fair and reasonable treatment in utility regulations. Further growth in this could be made by the Commission in reviewing rules that are as appropriate for small commercial customers as they are in these rules for residential customers based on available data. SBUA's expert provided previously the example of regressive fees that are no longer based on cost. Also we SBUA is concerned that the small businesses in the environmental justice communities are fairly and reasonably treated as the residential customers.

Also, SBUA suggests that the Commission consider examples of other best practices to approaching the determining the cost of compliance on small business that is required under ORS 183.336. As Oregon evolves in implementing mandates to remove carbon from its fuel supply it is important to assess the impact on the second largest customer group of the utilities providing Oregon businesses the energy needed to light their businesses, create and sell their product. SBUA will continue to work with the Commission in such efforts and increase the understanding of the Commission of how the Commission's rules impact small businesses.

Respectfully Submitted,



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