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February 19, 2021

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

**RE: UM 2114 – Comments of Joint Utilities Regarding the COVID-19
Disconnection Moratorium for Residential Customers**

Northwest Natural Gas Company dba NW Natural, on behalf of Avista Utilities, Cascade Natural Gas, NW Natural, PacifiCorp, Idaho Power Company and Portland General Electric Company (the “Joint Utilities”), provides the attached comments in response to the Public Utility Commission of Oregon Staff’s February 23, 2021 Public Meeting Memo.

Please contact me with any questions.

Sincerely,

/s/ Natasha Siores

Natasha Siores
Manager, Regulatory Affairs
NW Natural
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RE: UM 2114 – Comments of Joint Utilities Regarding the COVID-19 Disconnection Moratorium for Residential Customers

The Joint Utilities (Avista, Cascade Natural Gas, NW Natural, PacifiCorp, Idaho Power Company and Portland General Electric Company) appreciate this opportunity to provide comments on the Public Utility Commission of Oregon (Commission) Staff's report regarding the COVID-19 disconnection moratorium for residential customers in the above-referenced docket. The Joint Utilities thank Commission Staff for their leadership on this difficult issue. Commission Staff continue to seek to understand the concerns of a broad and diverse group of stakeholders. This has provided a robust process where ideas and proposals have been freely shared and scrutinized. The Joint Utilities also thank the stakeholders that have participated in this docket. Their additional perspectives and voices are valuable and contribute greatly to the discussion.

When the COVID-19 pandemic began nearly a year ago, all electric and gas utilities in Oregon voluntarily suspended normal collections processes due to the unprecedented conditions. Since that time the utilities, Commission Staff, and stakeholders have agreed on principles to assist customers adversely impacted by the COVID-19 pandemic, including extended time payment arrangements, arrearage management plans with debt forgiveness, and continuing the late fee moratorium, among others. The Joint Utilities strongly believe these additional customer protections will mitigate the impact of resuming residential collections processes, and greatly reduce the number of customers that may otherwise be disconnected for nonpayment. The Joint Utilities' shared goal is to provide flexible options and relief to our customers.

Given these customer assistance options, the Joint Utilities believe that the moratorium on issuing 15-day disconnection notices could be lifted on April 1 as originally planned. The Joint Utilities share the Commission Staff concern regarding overall growth of the arrearage balances, particularly the 90+ day balances. The data also shows that the overall number of customers in arrears is not increasing at the same pace as the balances, and in some cases is declining. The Joint Utilities believe that reaching these customers through typical collections processes and with the newly implemented assistance tools will mitigate the growth of the arrearage balances and also slow the growth of the deferral balance that will eventually be recovered from our broader customer base.

In the Commission Staff's most recent update to the Commission, Staff has recommended to extend the April 1, 2021 date on which the energy utilities may resume providing a 15-day disconnection notice for residential customers before disconnection to June 15, 2021. Notwithstanding the concerns raised above, the Joint Utilities can support the Commission Staff's recommendation to delay the resumption of 15-day disconnection notices for residential customers until June 15. However, both utilities and our customers need certainty as to when the moratorium will end and customer notices will need to resume. Having a firm resumption date will ensure clear communications in relaying date-specific information to customers and will help the utility/customer relationship by enabling utilities to appropriately balance the volume of touchpoints per customer by being able to target a date-certain, which we believe will increase our ability to make meaningful contact with customers and make them aware of additional assistance that is available. To the extent any further review is necessary, it should be limited to ensuring that the utilities are prepared to support customers with customer assistance programs developed in this proceeding.

Finally, the Joint Utilities recommend that any such review should occur in advance of May 15, rather than the June 15th date proposed by Commission Staff. The Energy Term Sheet, approved in Order No. 20-401, requires utilities to notify customers with past due balances 30 days in advance of issuing 15-day disconnection notices (i.e., by May 15). Any extension of the moratorium after the 30-day notices were sent to customers would result in unnecessary confusion and may cause customers to distrust the information they receive from their utility.

Thank you for the opportunity to comment. We look forward to participating in the open meeting on February 23, 2021 to further discuss these issues.

Sincerely,

/s/ Zach Kravitz

Zach Kravitz
NW Natural

/s/ Michael Parvinen

Michael Parvinen
Cascade Natural Gas

/s/ Etta Lockey

Etta Lockey
PacifiCorp

/s/ Connie Aschenbrenner

Connie Aschenbrenner
Idaho Power

/s/ Jay Tinker

Jay Tinker
Portland General

/s/ Shawn Bonfield

Shawn Bonfield
Avista