



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

April 1, 2022

*Via Electronic Filing*  
Public Utility Commission of Oregon  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: AR 653 / UM 2114, PGE’s Second Round Comment on Recommended Low-Income Designation in Division 21 of the Oregon Administrative Rules**

Dear Filing Center:

In addition to the second-round joint response comments provided by Avista Utilities, Cascade Natural Gas, Idaho Power Company, NW Natural, PacifiCorp d/b/a Pacific Power, and Portland General Electric Company (PGE) (collectively “the Joint Utilities”) on revised changes to Division 21 of the Oregon Administrative Rules (OAR) in AR 653/UM 2114, PGE appreciates the opportunity to make one additional comment on the proposed language for low-income designation.

PGE appreciates Staff’s incorporation of the Joint Utilities’ feedback to Staff’s initial proposal for the definition of “Low-Income Residential Customers.”

Staff’s second proposal is as follows:

**860-021-0180**

**Verification of Eligibility for Low-income Residential Customer**

**(1) A residential customer shall qualify as an eligible low-income residential customer for purposes of OAR 860-021-0205(5), OAR 860-021-0210, OAR 860- 021-0330, or OAR 860-021-0420 through the following methods:**

**(a) The customer is a recipient of energy assistance through the Low income Home Energy Assistance Program (LIHEAP) or the Oregon Energy Assistance Program (OEAP) or an energy assistance program offered by an energy utility; or**

**(b) The customer is enrolled in any of the utility’s income-qualified energy assistance programs, including discounted rates offered by a utility pursuant to 2021 House Bill 2475.**

Since the Commission has yet to approve *any* new discount rate programs under House Bill 2475, it is premature to mandate Division 21 allowances apply to those future programs. Instead, PGE suggests the Commission retain its discretion to determine whether the programs in (1)(b) should be included in the Division 21 definition. The number of participants in these future programs are still uncertain. In docket ADV 1365, parties were recommending eligibility criteria for PGE’s income-qualified program that could double the eligibility pool and significantly increase costs. While this may be an effective way to assist customers in paying their monthly bills, it is unknown how future expansion of eligibility in this rule could shift costs normally recovered through fees allowed under Division 21 to other customers.

For this reason, PGE suggests the language in OAR 860-021-0180(1)(b) be revised to:

**(b) As authorized by commission order, the participants in a utility's income-qualified energy assistance program, including discounted rates offered by a utility pursuant to 2021 House Bill 2475.**

PGE suggests the stakeholders discuss this proposed revision further in the April 6 workshop. We appreciate the opportunity to provide this additional comment and look forward to continued discussions.

Sincerely,

*\s\ Robert Macfarlane*

Robert Macfarlane  
Manager, Pricing and Tariffs