



Avista Corp.

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February 17, 2021

Public Utility Commission of Oregon
550 Capitol St. N.E. Suite 215
Salem, OR 97301-2551

Re: UM 2114 - Comments of Avista Utilities Regarding Disconnection Moratorium for Residential Customers

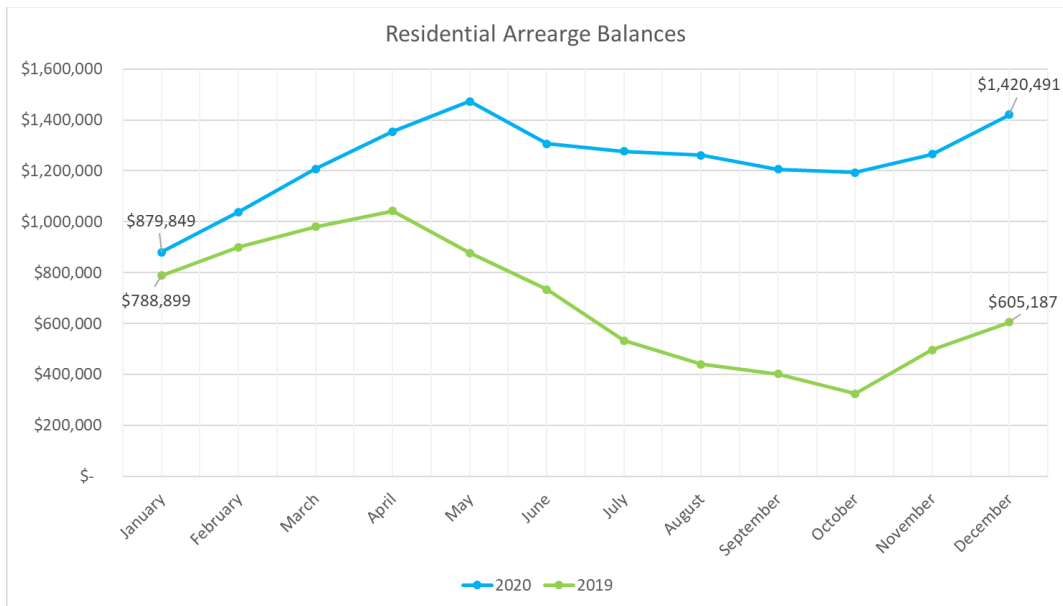
Avista Corporation, dba Avista Utilities (Avista or the Company), submits the following comments in response to the Public Utility Commission of Oregon Staff Report for the Public Meeting to be held on February 23, 2021 in Docket No. UM 2114, regarding the Investigation into the Effects of the COVID-19 Pandemic on Utility Customers. Avista greatly appreciates Staff's continued leadership throughout the investigation, pursuit of collaboration amongst the various stakeholders, and balancing of all customer, utilities, and stakeholder interests. Regarding Staff's recommendation 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 (effectively extending the disconnection moratorium to June 30, 2021), Avista supports Staff's recommendation. Avista also supports Staff's other three recommendation in the report.

Avista is ready and prepared for the disconnection moratorium to be lifted. With the bill assistance, energy assistance, and flexible long-term payments arrangements available to assist residential customers, there is no reason an Avista customer should find themselves in a disconnection situation. It is important to note that when disconnections for nonpayment resume, disconnection would only occur if a customer did not respond to the numerous communications provided by the Company regarding the assistance and options available to them.

As the Commission continues to evaluate the need for the disconnection moratorium, Avista recommends that the central focus not be on the date that disconnections may resume, but rather on the Company's preparedness to assist customers when collections do resume. Further extending the disconnection moratorium beyond what Staff is recommending may put some customers in a worse situation as it relates to the accumulation of arrearage debt. Trends in data show the increase in the overall arrearages are largely coming from those customers who are 90+

days behind on their bill; however, the total number of customers with arrearage balances is not growing at the same pace, and in some cases is declining. This means that a small portion of our customers are facing significant, and growing, arrearage balances.

It is imperative that Avista be able to reliably engage with its customers, discuss assistance options, and help customers plan for the resumption of our normal collection practices, which can be accomplished by ending the disconnection moratorium on June 30th. For Avista, June 30th is an ideal time to end the disconnection moratorium as the school year will be over for kids attending school virtually from home, customers use little to no natural gas in the summer months, and historically arrearage debt typically declines between April through October as customers get caught on their winter heating bills as shown in the following chart.



Again, we thank Staff for the leadership in navigating through the difficult process of how utilities and the Commission respond to the impacts of COVID-19 on utility customers. Please direct any questions regarding these comments to me at 509-495-2782 or shawn.bonfield@avistacorp.com

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager of Regulatory Policy & Strategy