

April 8, 2022

Public Utility Commission
Attn: Michael Dougherty
Filing Center P.O. Box 1088 Salem, OR 97308-1088

Re: Docket No. AR 653
Strengthening Consumer Protections Concerning Disconnections
Docket No. UM 2114
Investigation into the Effects of the COVID-19 Pandemic on Utility Customers
Amended Advocates' Comments on Staff's Second Draft of Changes to Division
21 Rules

Dear Mr. Dougherty,

The attached amended Joint Advocates' comments only differ from the original version in the number of organizations and individuals signing. They include organizations and individuals that could not complete their review of the comments in time for the original April 1, 2022 deadline.

Thank you for your and your team's work in this process.

Respectfully,

Silvia Tanner
Senior Energy Policy and Legal Analyst
Multnomah County Office of Sustainability

April 1, 2022

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Re: Docket No. AR 653
Strengthening Consumer Protections Concerning Disconnections
Docket No. UM 2114
Investigation into the Effects of the COVID-19 Pandemic on Utility Customers
Advocates' Comments on Staff's Second Draft of Changes to Division 21 Rules

The Joint Advocates, representing community-based organizations, community action agencies, consumer advocates, energy and climate justice organizations, and local governments, thank Oregon Public Utility Commission (PUC) Staff for their work on the March 23, 2022 second draft of revisions to the Division 21 Rules as well as for outlining their thinking in the accompanying Division 21 Supplemental Information document.

Staff's second draft continues to take important steps to recognize that some customers live at higher risk of disconnection while less able to fare with its impacts. However, Staff's Supplemental Information document suggests room for improvement in the proposed rules as well as need for continued conversation on how policies that may seem neutral can have inequitable impacts. We encourage Staff to continue striving to apply an equity lens in this process and working closely with PUC equity staff as this rulemaking progresses. Both actions are important in this process and throughout the PUC's work. In these comments, we include recommendations aimed at further mitigating the negative impacts of disconnection, particularly on those most vulnerable in our communities.

Importantly, we offer these recommendations in the context of a set of holistic efforts to reduce disconnections for inability to pay. Those efforts include the frontline-community-led work to pass HB 2475 (2021) that has given the PUC the authority to consider "differential energy burdens on low-income customers and other economic, social equity or environmental justice factors that affect affordability for certain classes of utility customers." Those efforts also include HB 2475 implementation, a temporarily increased low-income charge to fund the Oregon Energy Assistance Program, as well as ongoing legislative, regulatory, and program design work to ensure that low-income customers' access to renewable energy, weatherization and other energy efficiency measures increases. Together, those efforts should help reduce the risk of disconnection for an increasing number of energy burdened Oregonians.

We structure the comments and recommendations below following the structure of Staff's supplemental information document.

OAR 860-021-0008 - Definition of low-income customer

We suggest defining “low-income residential customer” in OAR 860-021-0008(7) rather than by reference to OAR 860-021-0180, which deals with verification. Staff states that their goal in simplifying the definition of low-income residential customer is “to include traditional low income (60% of the state median income).”¹ However, this language is not currently included in the proposed rules. Who meets the definition of a residential low-income customer and how they verify eligibility are different things, so having a definition in OAR 860-021-0008(7) is important.

As currently defined, by reference to draft OAR 860-021-0180, a "low-income residential customer" is someone who has received energy assistance or is enrolled in the low-income rate program. This definition risks excluding customers who are not enrolled, who are in the process of enrolling in either program, or who choose to only seek Division 21 protections. We offer the following suggested change to OAR 860-021-0008(7):

“Low-income residential customer” means a customer or applicant whose ~~eligibility has been verified under OAR 860-021-0180~~, income is at or below 60% Oregon state median income. An energy utility is not limited to this definition and may adopt a broader definition to capture additional low-income residential customers.”

OAR 860-021-0009 - Deletion of section on utility demographic data collection

We recommend that Staff reincorporates the language allowing utilities to collect demographic data. Staff articulated the following reasons for removing this language:

- Allowing for consideration of specific information collection requirements as necessary in the future.²
- The utilities did not believe it necessary as it is not prohibited and they do not plan to collect the data.³

Reluctance by the utilities to collect demographic data limits our collective ability to understand how utility and PUC policies and programs are positively or negatively impacting, or failing to impact, specific communities. We cannot address issues that we cannot measure. Hence, the continued efforts by several of the Joint Advocates to encourage utilities to collect demographic data from customers who choose to provide it. This data collection is commonplace for organizations serving impacted communities.

Reincorporating language allowing utilities to collect demographic information seems especially important in light of utilities expressing in the past that they were not sure that they could collect that data.

¹ Division 21 Supplemental Information at 4.

² *Id.* at 2.

³ *Id.* at 27.

OAR 860-021-0021 - Interruption of utility service/Commission notification when disconnection lasts more than 21 days

We are concerned about customers experiencing disconnection for more than 21 days and are curious about how the Commission plans on utilizing the information that it will gather during this notification process. We understand that in some circumstances, such as in a natural disaster scenario, it may be difficult and dangerous to reconnect a customer. However, the inquiry should not end here. In a more general situation, 21 days is a long time to be without power. We believe too long.

At the very least, the PUC should not only be notified that a customer is without power for more than 21 days but should disallow it unless there are good reasons. We urge Staff to go back to its original proposed language. We do not understand what the Commission would do with simple notification from utilities when they are unable to reconnect a customer for more than 21 days. We also suggest that this topic is flagged for discussion at the April 6, 2022 workshop.

OAR 860-021-0126 - Late payment charge

We support adding the protection from late payments for low-income customers in OAR 860-021-0126(3).

OAR 860-021-0180 - Verification of low-income residential customer

We appreciate Staff's efforts to simplify eligibility for Division 21 low-income protections. We also celebrate Staff's efforts to create room for including customers that may be above the 60% SMI threshold yet still be low-income, like minimum wage earners in Portland. We propose the following additional enhancements.

Narrowing verification only to whether someone has received energy assistance or is enrolled in the low-income rate program risks leaving out customers who would fall under the 60% SMI threshold but meet neither of those conditions. This could happen because customers are working to obtain energy assistance, a process that can take time, because they are working to enroll in the utility program, or because they are choosing to exclusively apply for Division 21 protections. Specifically tying eligibility for Division 21 protections to programs can discourage certain households from applying, like singles awaiting disability or households with undocumented residents that have had challenges providing the required documentation, have concerns about impact of getting assistance, or fear that every program has some federal connection.

In response to this concern, we propose including a third subsection for verification based on self-verification that one meets the 60% SMI threshold, or any higher thresholds adopted by the utility and suggest the following language:

“(c) the customer has self-certified that they meet the definition of low-income residential customer.”

This subsection would indicate that a person can access Division 21 protections outside of other established programs, like with how energy assistance people can complete and sign the Declaration of HH Income (DHI) form attesting that they receive no income or receive sporadic income, like collecting cans. This language would also clearly account for, and inform of, an alternate way to enroll other than actively participating in other energy-related programs.

We also propose adding a fourth subsection that brings back categorical eligibility through programs other than those specific to energy assistance as Staff had originally included in its January 22, 2022 draft. These programs include SNAP, Free and Reduced Price School Meals, WIC, TANF, and the like. It is no question that individuals enrolled in these programs are income burdened and should be able to access low-income protections offered through these rules.

Finally, we also suggest amending OAR 860-021-0180(1)(b) in recognition that the longer HB 2475 investigation has not begun and that what emerges may be different from a discounted rate (i.e. a percentage of income payment plan). For that reason, we recommend striking “discounted rates” and replacing with “any program offered by a utility to low-income customers pursuant to House Bill 2475 of 2021.”

OAR 860-021-0180 - Rejection of proposal to expand populations covered by Division 21 protections

The Joint Advocates proposed including customers with medical certificates and some of the Functional and Access Needs/At-Risk Populations as eligible for Division 21 protections in recognition that households are vulnerable to disconnection for more reasons than just income. In rejecting that proposal, Staff stated that “not all elderly and medical certificate holders (or eligible holders) and families with children are disconnection sensitive based on income and asset wealth.” While we agree that income and asset wealth may reduce the risk of disconnection for inability to pay, it does not reduce the impacts of disconnection on those populations. That has been a driver for our long-standing advocacy for the PUC to recognize the vulnerability of those populations, and has presumably led other PUCs to adopt protective measures for those populations. We ask Staff to please continue to explore how to recognize the vulnerability to the impacts of disconnection for these populations.

We appreciate Staff’s perspective that the Division 21 rules were written for low-income protections.⁴ We offer that energy burden, energy poverty, low-income and financial vulnerability do not begin at 60% of SMI. Many low-income people at risk of disconnection, and who live with energy burden and energy poverty, will not be protected by Division 21 protections or maybe even by the programs that emerge from HB 2475 implementation. Some of them will be Functional and Access Needs/At-Risk Populations. While this rulemaking may not be the forum where the PUC choosed to address this reality, we must center it in our work in utility regulation.

⁴ *Id.* at 20.

OAR 860-021-0200 - Establishing credit for residential utility service

We recommend referring to “low-income residential customers” in OAR 860-021-0200(2)(b) rather than to “low-income customers.” We found a few other instances throughout the document and encourage Staff to update that language for consistency.

The Joint Advocates still believe that the PUC should do away with a deposit requirement for any residential customer, as two of the six investor-owned utilities in Oregon have already done. Staff included language in OAR 860-021-0205(1) clarifying a low-income residential customer cannot be required to pay a deposit. We recommend that it also be included or at least referenced in OAR 860-021-0200.

OAR 860-021-0205 - Deposit payment arrangements for residential energy utility service

While our position is that deposits should be eliminated for all customers, under the current construct we support providing the time allowed by two subsequent monthly bills to pay installments as well as exempting residential low-income customers from deposit requirements.

OAR 860-021-0328 - Reconnection of residential energy utility service

We would like to learn more about how many additional days would the change to OAR 860-021-0328(3)(a)(A) add to the number of days when utilities would not need to reconnect customers under the rules. We request that this is addressed at the April 6 workshop.

OAR 860-021-0330 - Cap on number of reconnection fee waivers for low-income residential customers

The Joint Advocates appreciate that Staff’s first and second draft recommendations include a reconnection fee waiver. As we articulated in our March 7, 2022 comments, these types of fees are specially punishing for those experiencing financial insecurity. When a person does not have the money to cover their utility bill and is disconnected as a result, a reconnection fee can make regaining utility service that much harder.

We called for a more data driven determination of the appropriate cap for reconnection fee waivers in a given year since those living with financial insecurity are more likely to experience disconnection and be charged reconnection fees. Staff’s second draft Division 21 rule changes maintains the cap that Staff had already identified. Staff’s decision is grounded on their belief that “the revised rule offers adequate protections to low-income customers without placing extraordinary additional costs to the system.”⁵ Still, Staff commits to sending out data requests

⁵ *Id.* at 10.

on energy assistance customers and disconnects. We appreciate Staff's openness to look at the data and hope we can further explore this issue at the April 6 workshop.

We also acknowledge Staff's concerns about system costs. As our introduction highlights, this rulemaking takes place during an important period of holistic efforts to mitigate the harm of disconnection in our community (including this rulemaking, increased energy assistance funding, HB 2475 implementation, and an increasing focus on energy efficiency for energy burdened and energy poor customers). While we have yet to get a sense of potential costs associated with a higher cap on fee waivers, if that is what the data suggests, we believe that these multitude of efforts will likely result in less disconnections and lower costs associated with reconnection fee waivers, even as enhanced by our proposal.

OAR 860-021-0330 - After-hours disconnections and fee waivers

We reiterate our request that customers be granted some fee waivers for after-hours reconnections, at least for customers with specific circumstances. Accordingly, we are concerned about the prohibition on fee waivers for after-hour reconnections. We understand that there may be some concern when reconnection is not safe due to hazardous occurrences like wildfires; however, this does not justify an outright ban on fee waivers for after hour disconnections.

If a utility is actively engaged in an after-hour reconnection, then the customer should be able to utilize a fee waiver if that is available to them. Staff points out that active participation by a customer may alleviate the need for after-hour disconnections.⁶ However, there are a variety of reasons and experiences for customers in crisis that may not allow for active participation, even though that level of participation may seem obvious and easy for those of us not living that crisis. We do not see why a customer should not be able to utilize their fee waiver when reestablishing utility service.

While our recommendation was not adopted in Staff's second draft of Division 21 rules updates, we appreciate seeing in Staff's Supplemental Information document an openness to discussion on this issue and hope to have a fruitful conversation on this topic at the April 6 workshop.⁷

OAR 860-021-0335 - Refusal of utility service and two billing cycles to pay the amount owed

We support granting customers two subsequent billing cycles bills to pay the balance of the amount owed to the energy utility so that the utility does not refuse service.

⁶ *Id.* at 22.

⁷ *Id.*

OAR 860-021-0405 - Number of days required for notice

We strongly support extending the notice requirement beyond the current 15 days. We appreciate the movement to 20 days for all customers.

We would also like to better understand and explore at the April 6 workshop the challenges to implementing different notice timelines for low-income customers when utilities are already going to be implementing different policies for this group.

OAR 860-021-0405 - Changes in call requirement

We would like to learn about the implications of the changes in OAR 860-021-0405(9)(b)(B) from Staff and the utilities at the April 6 workshop.

OAR 860-021-0405 - Doing away with requirement that utilities request waiver before adopting “no cash at the door” policies

Our March 7 comments requested that Staff's subsequent rule revisions do not include changes to its current requirement that utilities request a waiver before adopting “no cash at the door” policies. Staff rejected our request because of its belief that “collecting money at the door should be a utility decision and not required by the Commission,” as well as its understanding that the multiple means of paying bills that utilities have adopted are sufficient.⁸ Staff also pointed to possible hesitancy to transact with a utility at the door, and to its belief that the practice is unsafe.⁹

We appreciate that, as Staff pointed out, the utilities would have leeway to accept cash at the door. However, the utilities today also have leeway to request a waiver and to address the appropriateness of their request to adopt a “no cash at the door policy” through the waiver process.

In fact, we believe that it is reasonable for a utility to have to accept some payment at the door to prevent a customer from experiencing disconnection when utility staff is there to disconnect. Recognizing the need to keep utility staff safe, and balancing that interest with that of its customers, we think a possible middle ground solution is to put a cap on the amount of money to be tendered at the door to prevent service disconnection. This balance would both heighten utilities' staff safety and ensure that customers are not disconnected from an essential service.

OAR 860-021-0406: Wildfire displacement protections - evacuation levels

We would like to thank Staff for adding both level 2 and level 3 evacuation notices as thresholds for moratoria on disconnection to ensure utilities are ready to spring to action. Customers who are expected to be ready to leave at any moment need the power even if they are at risk of

⁸ *Id.* at 13.

⁹ *Id.*

disconnection for inability to pay. Our feedback on this section is grounded on the experience of needing to evacuate during a wildfire and also of working closely with communities severely impacted by wildfires.

OAR 860-021-0406 - Addition of “upon request” language to reconnection provision

As for the option for reconnection, with utility readiness there must also be presence. Customers must be made aware of the process to reconnect utility service upon their request to the utility. During disasters and other emergencies, people are left scrambling, tired, and overwhelmed. We do not want to add any more complications to an already stressful situation.

Our March 7 comments recommended that we have a conversation on how outreach happens and we reiterate that request. It is imperative to find a middle ground here, so customers who need their power can have it and customers who don't need it will remain disconnected. Though the language “Upon Request” for reconnections in OAR 860-021-0406(3) may seem neutral and may even serve some, for others who need power and are not aware of this process it will be burdensome and can even put people's lives in danger.

We recommend that Staff, utilities, and advocates take the time to explore a balance that can work for various circumstances and that takes advantage of broad communication strategies. That conversation could begin at the April 6 workshop. Regardless of what the process is for reconnection after evaluation notices, customers must be aware of this process immediately after implementation. This means requiring outreach methods for utilities to ensure proper dissemination of information, such as local news coverage, radio advertisements in various languages, outreach to community-based organizations and school districts, and more.

There are various circumstances that can prevent someone from knowing the proper steps to take to be reconnected (lack of access to the internet, no bill records, no power, digitally illiterate, non-English speaking, disabled, etc.). Simply stating that the utility can be contacted because their number is on the internet and on the utility bills is incognizant as it disregards the multiple realities people face. How people are made aware is important, and that low-income customers, medically vulnerable customers, and other Functional and Access Needs/At-Risk Populations are prioritized in that outreach about the protections that these Division 21 rules warrant them is crucial.

OAR 860-021-0406 - Role of the utility in wildfire situations (resources/data on disconnections)

Besides the preparation of this process and making customers aware, it is also critical for utilities to have a presence during or following a disaster, once safe, to work on-the-ground with communities' needs. As our March 7 comments raised, many of those needs are within the scope of the utility's relationship to its customers. For instance, the Jackson County Expo was open to agencies and the public during and after the Almeda Fire to give vital resources and help people start the process for recovery. Fire survivors were asked multiple times by

government agencies to prove their home residency, yet they kept hitting walls since their records were lost in the fire. Having access to their utility bill that indicates their home address can be the golden ticket to get the recovery process started. Having utility staff on-site at evacuation centers and other community-based disaster/emergency resource centers will ease the process for utilities to identify impacted households who may or may not want their power on, as well as ease the stress for their customers in recovering records and applying for assistance.

We would also like to reinforce the importance of collecting data on disconnected households, including during PSPS. As we move to build resilient communities, we need to capture the reliability, or lack thereof, of the larger energy grid to explore and implement energy systems that will not only benefit local communities, but also allow them to thrive when the larger electrical grid is down or stressed. We challenge the notion that this is a questionable expansion of an energy utilities' responsibilities.¹⁰ We are asking for information on how utility customers are impacted by utility disconnections. This is information that only the utility has access to, and that the utility should be able to provide in conjunction with any information it has about those customers that can help us have a sense of vulnerability of impacted customers.

OAR 860-021-0407 - Introduction to our comments regarding the rules around severe weather moratoria

The recommendations regarding severe weather in our March 7 comments, as well as our comments below, are predicated on our desire to see the severe weather rules be grounded on health and safety. We recognize that access to heating and cooling, as well as access to air purification, are vital, and cannot happen for most Oregonians without energy utility service. Centering that recognition in these rules is especially important because we are likely to see severe weather events that are increasingly dangerous due to climate change. As the last two years have illustrated, what has worked until recently is unlikely to work in the same way moving forward.

In various instances of rejecting our recommendations, Staff stated that they did not believe that the changes were necessary or that they considered their proposed language adequate. Reasonable minds can disagree, but we need to have a thoughtful conversation about the bases for those positions and about whether they are consistent with a more health protective approach. Utility service is not just a convenience, it is a necessity. The conversation about how our severe weather rules evolve in this rulemaking should be grounded on that reality and should allow enough time for thoughtful exploration of these issues with the thoroughness that our communities deserve.

¹⁰ *Id.* at 24.

OAR 860-021-0407 - Rejection of request to explore more health-protective triggers for cold-weather-based severe weather moratoria

We continue to ask for a deeper conversation on more health protective triggers for cold weather based severe weather moratoria. Our March 7 comments outline why the current triggers are not sufficient, and why the proposed triggers still have room for improvement.¹¹ We described specific events in our region and how they would not have triggered a moratorium under the current rules or the rules as staff proposed to amend them, even though temperatures were extremely cold. Our Mach 7 comments also outlined our concerns regarding the inequitable impacts of having to face cold weather while disconnected. People who are at risk of disconnection because they cannot afford their energy bill are also likely to be the same people who live in poorly weatherized homes. As you can infer, this leads to higher bills and places these individuals at higher risk due to low indoor temperatures. With this in mind, we respectfully disagree with Staff's sentiment that the current or the revised rules provide sufficient protection and that no additional changes are necessary.¹²

While we continue to advocate for having a human health and safety centered conversation on this issue, we restate our proposal that local government's extreme or severe weather emergency declarations be included to the list of triggers. Local governments generally collaborate with utilities in situations of high risk to human health and safety, like severe weather events, so utilities are likely to be informed of these local alerts. While the National Weather Service is indeed a source of government expertise on weather,¹³ local governments respond to protect life and health in severe weather events and best understand the needs and vulnerabilities of their communities. Staff would be remiss to dismiss local government expertise in this process.

OAR 860-021-0407 - Rejection of request for forecasted severe weather/air quality event in future days

We reiterate and clarify our request for forecasted weather and air quality events to trigger a moratorium a few days before the predicted event. To illustrate, if a severe weather event is forecasted within the next 72 hours, and utilities would need to reconnect those disconnected in that period, why disconnect people in the first place? As Staff points out, forecasts decrease in accuracy as they go further out in days, but the change between the forecast today and two days from now is unlikely to be more than a few degrees. If the forecast changes the next day, then the utility can recommence disconnections.

Delaying disconnections when a severe weather event is in the forecast errs on the side of caution and of protecting health and life. If someone cannot afford to pay their utility bills, they are likely vulnerable in more than one way. As a result, we disagree with Staff that the current and revised rules offer sufficient protection and that no changes are necessary. We encourage

¹¹ Joint Advocates Comments at 5-6.

¹² Division 21 Supplemental Information at 22.

¹³ *Id.* 23.

Staff to consider adopting language that declares a moratorium when a severe weather event is forecasted within 72 or 48 hours, not just on the day of the severe weather event.

OAR 860-021-0407 - Rejection of request to add utility outreach requirement to disconnected customers during severe weather/air quality events

We restate our request that Staff include in subsequent drafts of the Division 21 rules a requirement that utilities engage in outreach to disconnected customers during severe weather events. Further conversation on the basis of Staff's discomfort with our request revealed Staff's concern that our request would ask the utility to engage in a social service function that Staff considers outside the realm of utilities' work. To this end, we want to emphasize that, as far as we are aware, a utility is the only entity that knows that a particular household is disconnected due to inability to pay during a severe weather event. A person or family facing a severe weather event without utility service is especially vulnerable to the impacts of that event.

While most of us engaged in this process could find ways to cope if faced with disconnection during a severe weather event, that is not the case for everyone in our communities. Not everyone is mobile, speaks English, has access to the internet, or has social support. Additionally, not everyone disconnected during a severe weather event may know that there are shelters available for their refuge. Even more worrying, public health entities do not always know who those vulnerable people are, further limiting life saving measures to these folks.

In contrast, we do know that they are at greater risk and that utilities can readily identify them. It therefore follows that utility outreach (i.e. by phone) to inform vulnerable people of their options (i.e. ability to request reconnection, energy assistance, shelters available) is appropriate. The cost of this outreach is outweighed by the likelihood of preventing serious and life threatening consequences.

OAR 860-021-0407 - Addition of language requiring that disconnected customers request reconnections due to severe weather/air quality events

We ask for a conversation about the addition of "upon request" language to the 72 hour reconnection requirement in OAR 860-021-0407(9). Here, our concerns mirror the concerns we expressed in response to the addition of similar language in OAR 860-021-0406(9). We worry that the right to reconnection due to severe weather will only be helpful with clear utility outreach requirements and expectations so that customers know that they can make that request. How people are informed of their ability to seek reconnection is key to making this section meaningful. We request a more robust conversation on this topic at the April 6 workshop.

OAR 860-021-0410 - Period for documenting self-certification

The Joint Advocates supported the original 60-day period to submit documentation after someone has self-certified as being medically vulnerable. We are not comfortable with decreasing it to 30 days, let alone 14 days, without a broader conversation grounded on the

realities of the process and time it takes to obtain confirmation from a medical professional. Not only is this process entangled with healthcare accessibility issues, but it is dependent on third-party (medical professional) availability, which we know is increasingly scarce. Allowing a longer period to obtain confirmation is necessary for offering realistic and workable protections through these rules. In sum, we support the 60-day period, and strongly oppose going below Staff's current 30-day period.

Relatedly, we would like to understand the utilities' concern with the initial proposal that erred on the side of greater flexibility through a 60-day period.

OAR 860-021-0410 - Rejection of request to add customers with medical certificates to the list of people eligible for Division 21 protections

We appreciate Staff's concerns with our request; however, we repeat that while not everyone with medical certificates are at risk of disconnection due to inability to pay, people with medical certificates do indeed face greater health risks from disconnection. For this reason we continue to seek to identify additional ways in which these rules could be more protective of them. We ask that this topic be explored at the April 6 workshop.

OAR 860-021-0415 - Time payment arrangements

We thank Staff for its efforts to find a compromise between its original proposal, the Joint Advocates' position, and the utilities' position. The proposed position seems reasonable to us. Our one suggestion is that utilities are required to inform customers of longer duration plans and that the "may" in OAR 860-021-0415 be replaced with "should." Customers know their individualized needs better than the utility and should have information about all of their options at their disposal.

Conclusion

We appreciate Staff's work to move the Division 21 rules in a generally good direction and thank you in advance for considering our recommendations.

Respectfully submitted this 1st day of April, 2022.

Sincerely,

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