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Public Utility Commission of Oregon
201 High St. SE, Suite 100
Salem, Oregon 97301-3398

Re: PUC Memo on COVID-19 and Disconnections Date

As per the CEP letter submitted on Tuesday, February 9, we would like to reinforce our request for the Oregon Public Utility Commission (PUC) to extend the utility disconnection moratorium beyond April 1, 2021. In response to points brought forth during the Moratorium Workshop on Friday, February 12, as well as the revised February 16th memo submitted, we'd like to make the following comments:

While extending the disconnection moratorium by two months is a good first step, it is nowhere near enough. It is still unknown if the worst of the pandemic has yet to pass. There are more infectious SARS-CoV-2 variants, such as the B.1.1.7 variant, that have started to circulate the United States.¹

Furthermore, even if the economy is showing signs of turnaround, it is not reflective of all communities. People who have been severely financially impacted by the pandemic will need months, if not years, to fully recover from the impacts of COVID-19.

As such, CEP recommends that the moratorium is extended ideally through April 1, 2022 or at least through January 1, 2022. In a town hall on CNN on February 16, President Biden said his administration expects the US will be more back to normal by the end of 2021.² Even the President does not expect results by June.

With such an extension, the utilities will have time to contact customers in arrears with their new payment plan options, without the threat of a shut off. In the past week, CEP staff spoke to 41

¹Walensky, R. P., Walke, H. T., & Fauci, A. S. (2021, February 17). SARS-CoV-2 Variants of Concern in the United States—Challenges and Opportunities. JAMA. <https://doi.org/10.1001/jama.2021.2294>

² Liptak, K. (2021, February 17). *Biden says things may be back to normal by next Christmas*. CNN. <https://www.cnn.com/2021/02/16/politics/biden-town-hall-february/index.html>.

low-income clients. The majority of these clients were struggling to pay utility bills, and did not know whom to contact to get assistance. They also expressed willingness to set up payment plans with help.

While CEP is ready to work with utilities to reach such clients, it is concerning that the staff memo from February 17th seems to expect “low-income, social justice, and environmental justice groups” to reach out to customers in arrears and inform them about available resources in only two months. Not only is this timeline unrealistic, it also puts a burden on community based groups with questions remaining about how this work would be compensated and coordinated.

We are also concerned that some arrearage plans assume customers will receive energy assistance funds to help pay for part of the arrears. Per CAPO, LIHEAP budgets are spent by April in a normal year and new funding will not be available until October. This will result in customers not able to access energy assistance to help pay bills between April and October.

We cannot emphasize enough that a threat of power cutoff could force people to resort to choosing utility bills payments over buying essential food and medicine they need to survive. As we have seen the past few days in Oregon and Texas, having energy cutoffs can put vulnerable communities in life-or-death situations. It is harmful logic for utilities to argue that penalizing customers with power cutoffs is necessary to gain their attention.

Lastly, we'd like to reiterate that extending the moratorium is an action the PUC can take to fulfill the directives of EO 20-04 to “prioritize actions that will help vulnerable populations and impacted communities adapt to the effects of climate change.”

Sincerely,

Community Energy Project
Electrify Now