



February 19, 2021

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

As our nation nears 500,000 deaths due to Covid-19, and as [new variants threaten to derail the global economic recovery](#), the Public Utility Commission is considering whether to let the statewide moratorium on energy disconnections expire on April 1. The PUC staff's revised recommendation to extend the moratorium until June 15 is an improvement, but it is still inadequate for a number of reasons.

First, the staff report includes an "alternate recommendation" that the commission allow the moratorium to expire on April 1, 2021. An April 1 expiration date contradicts the thoughtful, experience-informed perspectives that community advocates shared at the Feb. 12 meeting. Resuming disconnections in less than fifty days is simply not an option. Second, the June 15 extension, while certainly an improvement, wrongly assumes that the pandemic and its economic impacts will be "back to normal" by mid-summer. As the report notes, low-income workers are experiencing the slowest recovery of all workers, and thinking that this group will catch up to the rest by June is a dangerous assumption. Given this reality, we are concerned that we will find ourselves in a mostly unchanged position when the moratorium expires in four months: advocating for the same customers facing the same day-to-day challenges of quarantine and an economic recession. Third, and most importantly, the recommendation is based on the widespread assumption that shutting off electricity because of an inability to pay is acceptable in "normal" times. Oregon is better than this; allowing utilities to disconnect customers from electricity, even if only to bring non-paying customers to the table, is inherently wrong. **As organizations in direct contact with the populations most at risk of disconnection, we strongly oppose denying people their right to energy, especially during a pandemic and an**

economic recession. We urge the commission to extend the disconnection moratorium until at least April 1, 2022 and study long-term solutions for ending disconnections for overdue bills.

Our request is based on decades of thinking about human rights. Article 26 of the [United Nations' Universal Declaration of Human Rights](#) declares the right to “a standard of living adequate for the health and well-being of [oneself] and of [one’s] family,” including access to affordable utilities. [Numerous nations](#) have enshrined the right to water and electricity in law. During the Covid pandemic, our government has upheld the right to housing through temporary eviction moratoria. Just as it is wrong to deny a person housing simply based on their inability to pay, we believe it is wrong to deny a person access to energy simply because they cannot afford a bill.

The recommendation to let the current moratorium expire in four months will unquestionably hurt Oregon’s families, who are already dealing with past-due rent, higher food costs, [higher water bills](#), remote schooling and high unemployment. In any given year, energy shutoffs threaten the health of residents; rarely have shutoffs been so threatening as this year, when Oregonians are experiencing an unusually cold winter and enduring a pandemic that has dramatically increased dependence on energy access. Further, we know that these hardships are not equitably distributed; we know that [utility shutoffs and evictions have been more common for households of color than white households](#) during the pandemic. When disconnected, certain groups become especially vulnerable, including low-income households with children, rural communities, the elderly, pregnant and lactating women, people with disabilities, and people suffering chronic illnesses. **Disconnection because of inability to pay is an injustice felt first and worst by those most dependent on reliable energy.**

Although many utilities and state agencies have laudably developed [assistance programs](#) to mitigate the risk of disconnection, **assistance is not sufficient**; utilities and the Public Utility Commission must also adopt policies that avoid disconnections and promote long-term affordability. The moratorium extension for which we are advocating is an opportunity for the commission to reframe its thinking on shutoffs by **opening a new docket, convening stakeholders, studying the effects of shutoffs on under-resourced communities (including environmental justice communities, as prescribed in ORS 182.545), and generating creative, long-term solutions to the serious injustice of shutoffs based on inability to pay.**

Ensuring access to basic goods affirms the human dignity of every person that enjoys them; to deny anyone access constitutes a violation of their human dignity. Utility shutoffs are today largely treated as a necessary evil, justified by utilities’ need to maintain affordable rates for ratepayers. However, a system sustained only by the threat of denying vital goods to customers is not, in fact, sustainable. **We therefore urge the commission to vote to extend the current disconnections moratorium for at least a year and study long-term solutions to this problem. Our most vulnerable neighbors can’t afford anything less.**

Sincerely,

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