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October 28, 2024

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

**RE: UM 2211, Cascade's Comments on Draft Revisions to
OAR 860-021-0480, Disconnect Reporting Rule**

Cascade Natural Gas Corporation ("Cascade" or "Company") provides the following comments in response to Oregon Public Utility Commission ("Commission") Staff's proposed draft revisions to Oregon Administrative Rule ("OAR") 860-021-0408, Disconnect Reporting Rule, as presented at the October 21, 2024, workshop. Attached are the draft rules with Cascade's proposed revisions in redline text. A brief explanation of the edits is provided below

Rule Title

Cascade recommends that the rule be retitled, "Reporting Rule" to accommodate Staff's proposed revisions which are broader in scope than disconnections.

General

Cascade revises a number of definitions and subsequent sections for consistency and clarity, adding modifiers such as monthly, residential, and bill discount where the specificity will aid utilities with compliance. Other edits are made to ensure the rule uses the defined term when appropriate (e.g., 31-60 days *in arrears*, emphasis added to illustrate words in defined term that are missing in rule references.)

Definitions

(1)(c) Arrearage Balance

Cascade proposes that the definition of arrearage balance be limited to any amount owing the utility for services rendered, as opposed to any amount owing past the due date. In Cascade's vernacular, arrearage days begin when the bill is issued. Past due is defined as dollars owing after the due date of the bill. It would be a significant programming change for Cascade to reconfigure how it defines arrearages.

Cascade's billing process is as follows:

- Day Zero – The bill is issued
- Day One – The amount due is considered an arrearage.
- Day 22 – The bill is due.
- Day 23 – The bill is overdue.

Cascade revises a number of definitions so they align with Cascade's definition for arrearage balance.

Please note, the definition for "(t)otal arrearage balance" includes the clarification that this metric is quarterly ("during the reporting period.") Cascade adds "monthly" in definitions throughout where the timeframe is not defined. Whether monthly or quarterly is chosen, Cascade believes a consistent timeframe should be added for each metric.

(1)(j) Companywide

"Geographical region" is replaced by "an energy utility's certificated service territory," which does not encompass any regions where a utility may offer below-the-line or affiliate products or services.

(1)(k) Disenrollments

Cascade reads this definition as including customers who have voluntarily disconnected service and/or moved from the service territory. Assuming this is unintentional, Cascade proposes language to exclude customers who no longer have an active account with the energy utility.

(1)(l) Energy Assistance Recipient

In agreement with comments made at the October 21, 2024, workshop, Cascade believes the phrase "utility-supported bill payment assistance fund or program" is confusing and recommends this be replaced with "utility offered donation bill payment assistance program." For further clarification, Cascade adds a sentence stating that energy assistance does not include payments from friends, family, and churches.

(1)(m) High-Usage Customer

The word "Oregon" is added to modify the service area. This is not necessary, as the rules are specific to Oregon; however, the addition is consistent with the specificity offered in other definitions such as Average Residential Bill, Average Residential Usage, and Companywide.

(1)(n) New Enrollments

This definition is revised to define new enrollments a customers who sign up for a bill discount program for the first time in the current calendar year. As the program ages, it will be difficult, if not impossible, to track customers historical participation in a bill assistance program.

(1)(q) Residential Customer

This definition is revised to clarify that residential energy usage is specific to energy usage in a living space. A customer may have a shop or office that, if it were separately metered, might be commercial, but because the customer's usage is mostly for their personal habitation, the

service is considered residential. Stating a residential customer will not have commercial usage is not always accurate.

(1)(v) Total Bill Discount Program Costs

Cascade's internal labor used for administering its bill discount program is recovered in rate base and is not separately tracked. As such, Cascade revises this definition so that it refers only to incremental costs.

Reporting Requirements

(4) -The reporting requirement as currently drafted are specific to residential accounts. This language did not carry forward in Staff's draft. Cascade adds it back in under Section (4).

(4)(a)(A) & (B) The referenced arrearage buckets are revised to refer to the defined terms.

Cascade appreciates the inclusion of Section 8 as reviewing and refreshing the reporting requirements are essential to keeping them relevant for contemporaneous concerns.

Conclusion

Cascade appreciates the opportunity to comment in this proceeding and is grateful for Staff's continued efforts to draft rules that consider the differences with each utilities' billing systems.

Please direct any questions regarding this filing to me at (208) 377-6015 or to Jennifer Gross at (509)-975-9473.

Sincerely,

/s/ Lori Blattner

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Attachment

OAD 860-021-0408

~~Disconnect~~ Reporting Rule

Draft Revision

(1) As used in this rule:

- (a) "Administrative costs" means all incremental expenses related to the management and operation of the bill discount program. This includes but is not limited to: incremental costs for program design, staff salaries, data processing, customer outreach, eligibility verification, compliance, reporting, and any other overhead or indirect costs necessary to administer the program.
- (b) "Applied credits" means the aggregate dollar value of discounts applied to the utility bills of residential customers that participate in the utility's bill discount program.
- (c) "Arrearage balance" means any amount of money that a customer owes to the utility ~~company~~ for services provided, ~~which remains unpaid past the due date specified on the bill.~~
- (d) "Average bill of high-usage customers" means the average monthly dollar amount the utility billed ~~amount for~~ all high-usage customers, ~~expressed in dollars.~~
- (e) "Average bill discount program participant bill" means the average monthly dollar amount the utility bill ~~for~~ residential customers enrolled in a utility-administered bill discount program
- (f) "Average bill discount program participant usage" means the average monthly usage of residential customers enrolled in a utility-administered bill discount program.
- (g) "Average residential bill" means the average monthly amount billed ~~to for~~ residential ~~customers~~ ~~for~~ utility services within a utility's Oregon service territory.
- (h) "Average residential usage" means the average monthly amount ~~of energy billed bill~~ per residential customer within a utility's Oregon service territory.
- (i) "Average usage of high use customers" means the average monthly energy consumption of all high-usage customers within a utility's Oregon service territory classified as high-usage.
- (j) "Companywide" means ~~the geographic area served an energy utility's certificated service territory by a particular energy utility~~ within the state of Oregon.
- (k) "Disenrollments" means residential customers who were enrolled in a utility's bill discount program as of the previous reporting period but are no longer participating as of current the reporting period. This includes customers who voluntarily withdrew, no longer meet eligibility criteria, or were removed from the program due to ineligibility or non-compliance, but it does not include customers who no longer have an active account with the energy utility.

- (l) “Energy assistance recipient” means a residential customer who has received bill payment assistance with an energy bill from any federal, state, ratepayer-funded, or utility-supported offered donation bill payment assistance fund or program at least once within the past 12 months. Energy assistance does not include payments from individuals, such as friends or families, or churches.
- (m) “High-usage customer” means a residential customer participating in a utility-administered bill discount program whose energy consumption places ~~them is within~~ in the 90th percentile or above of all other bill discount program participants within the utility’s Oregon service area.
- (n) “New enrollments” means residential customers ~~who are enrolled~~ in a utility’s bill discount program for the first time within the current calendar year.
- (o) “Pre-discount average bill discount program participant bill” means the average monthly utility bill ~~amount~~ for bill discount program participants before the application of any bill discount.
- (p) “Post-discount average bill discount program participant bill” means the average monthly utility bill ~~amount~~ for bill discount program participants after the application of a bill discount.
- (q) “Residential customer” means any individual ~~or household~~ that receives utility services for their personal, ~~non-commercial use~~ living space. This includes all customers ~~being served~~ on a utility’s residential service tariff.
- (r) “Service disconnection for non-payment” means instances where utility service to a residential account was terminated due to the customer’s failure to pay their utility bill.
- (s) “Total arrears balance of high-usage customers” means the cumulative dollar amount of ~~overdue~~ balances owing for all high-usage customers ~~with an arrearage balance~~ during the reporting period.
- (t) “Total arrears balance of bill discount program participants” means the total ~~dollar monthly~~ amount ~~of outstanding balances owed by~~ residential customers enrolled in a utility-administered bill discount program owe for utility service on their utility bills.
- (u) “Total dollars provided to bill discount program participants” means the aggregate dollar value of discounts applied to ~~utility bills of utility’s bill discount program participants’ residential customers monthly bills that participate in a utility’s bill discount program.~~
- (v) “Total bill discount program costs” means the total ~~expenditure incremental costs~~ incurred by a utility in administering its income-qualified bill discount program ~~for low income residential customers.~~

- (w) "Total residential arrearage balances" means the total dollar amount ~~of outstanding balances~~ owed by residential customers on their utility bills.
 - (x) "Total residential usage" means the total amount of energy billed for all residential customers within a utility's Oregon service territory.
 - (y) "31-60 days in arrears" means a customer who has an ~~arrearage balance that has been unpaid for a period of amount owing~~ between 31 and 60 days from the ~~original due date~~ issuance of a monthly utility bill.
 - (z) "61-90 days in arrears" means ~~a~~ customer who has an ~~arrearage balance that has been unpaid for a period of amount owing~~ between 61 and 90 days from the ~~original due date~~ issuance of a monthly utility bill.
 - (aa) "91 or more days in arrears" means a customer who has an ~~arrearage balance that amount owing has been unpaid~~ for a period greater than 90 days from the ~~issuance of a monthly utility bill~~ original due date.
- (2) Each energy utility must submit electronic quarterly reports containing the data described in this rule. Electronic reports must be submitted in text-searchable excel and PDF formats. Utilities shall include zip-code level data within the accompanying excel files.
- (a) For quarterly reporting purposes, the following four time periods apply: January 1 to March 31, April 1 to June 30, July 1 to September 30, and October 1 to December 31.
 - (b) The energy utility must file a quarterly report as required under this rule within 45 days of the end of each reporting period.
 - (3) If errors or omissions are discovered in a utility company's report after its report has been submitted, the utility must submit a revised report within 30 days of the discovery.
 - (4) The quarterly report must provide the following data points for residential account for each month within the quarter:
 - (a) On a companywide basis, the:
 - (A) Total Number of Residential Customers with Arrearage Balances segmented into three groups based on the age of the arrearage including: 31-60 days in arrears ~~31-60 days~~, 61-90 days in arrears, and 91 or more days ~~past due~~ in arrears. Each residential customer should only be counted in one group, based on their oldest arrearage balance;

- (B) Total residential arrearage balances segmented into three groups based on the age of the arrearage, including: 31-60 days in arrears, 61-90 days in arrears, and 91 or more days in arrears past due;
- (C) Total number of customers enrolled in Time Payment Arrangements or other extended payment plans. This includes all residential customers who are actively enrolled in a Time Payment Arrangement or any other extended payment plan offered by the utility as of the reporting period;
- (D) Total number of active residential accounts;
- (E) Total number of service disconnections for non-payment;
- (F) Percentage of accounts with service disconnections for non-payment. This includes the proportion of active residential accounts that experienced a service disconnection for non-payment during the reporting period. This percentage is determined by dividing the total number of service disconnections for non-payment by the total number of active residential accounts and multiplying by 100;
- (G) Total number of bill discount recipient program participants that have experienced service disconnections for non-payment;
- (H) Total number of energy assistance recipients that have experienced service disconnections for non-payment;
- (I) Total number of residential service disconnections for non-payment on medical certificate holder accounts;
- (J) Number of residential service reconnections following a service disconnection for non-payment on the same day or next calendar day following disconnection;
- (K) Number of residential service reconnections following a service disconnection for non-payment that occur more than one day and within seven calendar days following disconnection;
- (L) Number of days on which the energy utility was required to impose a moratorium on service disconnection for severe weather as required by OAR 860-021-0407 (Severe Weather Moratorium on Involuntary Disconnection of Residential Electric or Gas Utility Service);
- (M) Total residential usage during the reporting period;
- (N) Average residential usage during the reporting period. This data point should be calculated by dividing the total residential usage by the total number of residential customers billed during the same reporting period;

- (O) Average residential bill during the during the reporting period. This data point should be calculated by dividing the total amount billed to all residential customers by the total number of residential customers billed during the same reporting period;
- (P) Total number of residential customers ~~which~~who received a bill discount, by discount tier;
- (Q) Total dollars provided to bill discount program participants, by discount tier.
- (R) Total program costs divided into two distinct categories: incremental administrative costs and applied ~~credits~~bill discounts;
- (S) Total number of new enrollments;
- (T) Total number of disenrollments;
- (U) Average bill discount program participant usage, categorized by bill discount tier;
- (V) Average bill discount program participant bill, categorized by bill discount tier.
- (W) Pre-~~d~~Discount ~~a~~Average bill for a bill discount pProgram ~~P~~pparticipant ~~Bill~~, categorized by bill discount tier;
- (X) Post-~~D~~Discount ~~A~~average bill for a bill discount program pParticipant ~~Bill~~, categorized by bill discount ~~by~~ tier;
- (Y) The number of bill discount program participants with an arrearage balance segmented into three groups based on the age of the arrearage: 31-60 days in arrears, 61-90 days in arrears, and 91 or more days in arrears, past due. Each bill discount program participant should only be counted in one group, based on their oldest arrearage balance.; and
- (Z) Total arrears balance of bill discount program participants segmented into three groups based on the age of the arrearage: 31-60 days in arrears, 61-90 days in arrears,, and 91 or more days in arrears, 31-60 days, 61-90 days, and 91 or more days past due.
- (5) For annual reporting purposes, the following time period applies: January 1 to December 31.
- (6) Each utility, in addition to the quarterly reporting requirements, shall submit an annual supplement report which provides the following information for each month within the year:
- (a) The number of high-usage residential customers;
- (b) Average usage of high-usage residential customers;
- (c) Average bill of high-usage residential customers;

- (d) Number of high-usage residential customers with an arrearage balance, segmented into three groups based on the age of the arrearage: 31-60 days in arrears, 61-90 days in arrears,, and 91 or more days in arrears,~~1-60 days, 61-90 days, and 91+ days past due~~. Each residential customer should only be counted in one group, based on their oldest arrearage balance.
 - (e) Total arrears balance of high-usage residential customers, segmented into three groups based on the age of the arrearage: 31-60 days in arrears, 61-90 days in arrears,, and 91 or more days in arrears,~~31-60 days, 61-90 days, and 91+ days past due~~; and
 - (f) Total number of high-usage residential customers who experienced a service disconnection for non-payment.
- (7) Each utility must provide the following information by zip code:
- (a) Number of residential customers with arrearage balances;
 - (b) Total residential arrearage balances;
 - (c) Number of customers enrolled in time payment arrangements or other extended payment plans;
 - (d) Number of active residential accounts;
 - (e) Number of residential service disconnections for non-payment;
 - (f) Percentage of residential accounts with service disconnections for non-payment;
 - (g) Number of residential service disconnections for non-payment on bill discount program ~~particiant~~recipient accounts;
 - (h) Number of residential service disconnections for non-payment on energy assistance recipient accounts;
 - (i) Number of residential service disconnections for non-payment on medical certificate holder accounts;
 - (j) Number of residential service disconnections for non-payment on medical certificate holder accounts that are also energy assistance recipient accounts;
 - (k) Number of residential service reconnections following a disconnection for non-payment on the same day or next calendar day following disconnection;
 - (l) Number of residential service reconnections following a disconnection for non-payment that occur more than one day and within 7 calendar days following disconnection;

(m) Average residential usage;

(n) Average residential bill;

(o) The number of residential customers ~~which~~who received a bill discount, by discount tier;

(p) New enrollments;

(q) Disenrollments; and

(r) The total dollars provided to bill discount program participants, by discount tier

(8) The Commission will review the reporting metrics outlined in this rule every two years. In doing so, the Commission may engage stakeholders to ensure the relevance of data for addressing energy burden.