

November 13, 2025

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

Re: UM 2211/AR 671 - Community Organization request for emergency disconnection moratorium through April 1, 2026 or 45 days after LIHEAP is funded in Oregon, whichever comes later

Dear Commissioners and Staff:

The undersigned climate, environmental, consumer justice, and environmental justice advocacy organizations, community based organizations, and Energy Justice Advocates submit this request in support of, and complementary to, the Energy Justice Advocates' request, in their November 12, 2025 AR 671 comments, for a temporary moratorium on disconnections due to the geopolitical, economic, societal, and/or environmental conditions that threaten customers' ability to pay their energy bills now and into the near future. We submit this specific request within UM 2211, the general umbrella docket for HB 2475 (2021), and the rulemaking docket for AR 671 surrounding permanent rules for disconnection protections, in the interests of consistency, transparency, expediency, and efficiency. We also submit this request here in case that the Oregon Public Utility Commission and Commission Staff determine that a separate expedited rulemaking or docket is the more appropriate forum to consider this moratorium request.

A. This Commission should immediately institute an emergency winter moratorium on disconnections through at least April 1, 2026 or 45 days after Oregon receives LIHEAP funds, whichever comes later. Further, this Commission should extend Time Payment Arrangements (TPAs) from 12-months to at least 24-months for residential arrears incurred from now through the temporary moratorium, with additional flexibility on missed payments, particularly in the summer and winter months.

In July 2025, Congress passed HR 1 ("the budget bill") which has several impacts to low-income Oregonians who normally receive or qualify to receive the Supplemental Nutrition Assistance Program (SNAP), Medicaid, Low Income Home Energy Assistance Program (LIHEAP), and other safety net programs with federal funding.¹ Some of these impacts include changes to who can qualify to receive SNAP—with particular impacts to immigrant households, along with new work requirements for many households. For example, the work requirement age threshold was changed from 54 years old to 64 years old, as was the age of dependents which was changed

¹ H.R. 1, 119th Cong., <https://www.congress.gov/bill/119th-congress/house-bill/1>.

from 18 years old to 14 years old.² According to the Oregon Department of Human Services (ODHS), “Able-bodied Adults Without Children” who do not meet the new work rules from HR 1 may lose SNAP benefits three months from October 1. Other negative HR 1 impacts to federal benefits will affect recipients of programs like Medicaid.³

Additionally, energy assistance will now count as income for most households when their monthly SNAP benefit amounts are calculated, except for households with an adult age 60 years or older or someone with a disability.⁴ About 9,600 Oregon low-income households who receive LIHEAP and SNAP benefits saw their SNAP benefits reduced this November because they recertified⁵ between July 4 and October 1.⁶⁷ SNAP benefits for an additional 20,000 low-income Oregon households will be reduced once they recertify after October 1.⁸ Roughly 29,000 low-income Oregon households will see their SNAP benefits reduced by \$58/month because of this change related to the Standard Utility Deduction.⁹ According to ODHS, “The budget bill makes sweeping restrictions, funding shifts, and cuts that disproportionately impact low-income families, older adults, children, immigrants, and the financial stability of households.”¹⁰ It is also worth noting that the majority of community members who receive LIHEAP and OEAP benefits are renters, adding to their risk. All of these actions and impacts are beyond the control of impacted families.

On top of HR 1 impacts, on October 1, 2025 the federal government shut down. This has been the longest shut-down in U.S.history, and while the shutdown is over, its impacts remain. As a result of the shut-down, payments for SNAP were delayed. Federal funding for LIHEAP is not only still delayed but the timing of distribution to the states remains uncertain due to staff cuts at the U.S. Department of Health and Human Services and perceptions in the federal executive branch that LIHEAP is unnecessary. On October 29, 2025, Governor Kotek declared a Food Emergency in response to the 757,000 Oregonians whose SNAP benefits were delayed by the

² Oregon Department of Human Services, *Frequently Asked Questions: Implementing HR1 Changes to SNAP Eligibility Oct. 1., 2025* (Oct. 7, 2025), <https://www.oregon.gov/odhs/news/Documents/hr1-implementation-faq.pdf>.

³ See *Id.*; See Governor’s Office Preliminary H.R. 1 Impact Analysis (Aug. 11, 2025), <https://drive.google.com/drive/folders/11yr4bNXj9OBk7e0ZKgU30wC4DG3sQ4aR>.

⁴ U.S. Department of Agriculture, Food and Nutrition Service, *SNAP Implementation of the One Big Beautiful Bill Act of 2025 - Treatment of Energy Assistance Payments* (Aug. 29, 2025), <https://www.fns.usda.gov/snap/admin/energy-assistance-payments>.

⁵ National Council on Aging, *SNAP Recertification: Why, When, and How to Renew Your Benefits Eligibility* (May 19, 2025), <https://www.ncoa.org/article/snap-recertification-why-when-and-how-to-renew-your-benefits-eligibility/>.

⁶ *Implementing HR1 Changes to SNAP Eligibility*, *supra* note 24.

⁷ This does not account for the federal government’s request for States to scale back the SNAP benefits they released on Friday November 7, 2025 and the possible forthcoming outcomes from this request.

⁸ *Implementing HR1 Changes to SNAP Eligibility*, *supra* note 24.

⁹ *Id.* at 4.

¹⁰ *Id.* at 5.

federal government.¹¹ Oregonians received SNAP benefits for November pursuant to a court order. However, uncertainty still remains for the coming months and even for this month as the Supreme Court temporarily blocked the order to fully fund SNAP food aid payments amid the government shutdown on November 7. This situation is also quickly changing.¹² Even after the end of the shut-down, we expect that impacts will linger, and cannot overemphasize our concern about LIHEAP benefits potentially taking weeks to make it to the states and to Community Action Agencies.

Simultaneously, ramped up immigration enforcement has had a chilling effect on immigrant households in Oregon.¹³ These community members are fearful of leaving their home at all, missing shifts at work. An increasing number of families are now also missing family members who normally contribute to household income, while dealing with trauma and scrambling to find funding for legal representation of their family members in immigration detention. This environment of heightened immigration enforcement results in community members being unable or afraid to seek necessary assistance.

We have seen important calls and steps to respond to these crises. In response to these converging crises, Washington County, Oregon declared two states of emergency on November 4.¹⁴ The County Commissioners recognized that food insecurity and “recent federal activity across the county related to the immigration and refugee community” are putting people at risk.¹⁵ Washington County is the second most populous county in Oregon, with roughly 617,000 residents.¹⁶ The majority of its residents are PGE and NW Natural customers. As of November 7, eighteen of Oregon’s legislators have also formally recognized this compounded crisis through their request to this Commission and utilities to issue a temporary moratorium on utility shutoffs in light of the exigent economic circumstances.¹⁷

¹¹ See Governor’s Office, *Governor Kotek Declares Food Emergency, Directs \$5 Million to Food Banks, and Calls Oregonians to Action as Federal Shutdown Cuts Off SNAP Benefits* (Oct. 29, 2025), <https://apps.oregon.gov/oregon-newsroom/OR/GOV/Posts/Post/governor-kotek-declares-food-emergency-directs-5-million-to-food-banks-and-calls-oregonians-to-action-as-federal-shutdown-cuts-off-snap-benefits>.

¹² Associated Press, David A. Lieb, Michael Casey, Scott Bauer, and Mike Catalini, *Supreme Court issues emergency order to block full SNAP food aid payments* (Nov. 7, 2025), <https://apnews.com/article/snap-food-government-shutdown-trump-a807e9f0c0a7213e203c074553dc1f9b>.

¹³ Yesenia Amaro, The Oregonian/OregonLive, *U.S. Border Patrol agents are making arrests in the Portland area, officials confirm. What to know* (Nov. 12, 2025), <https://www.oregonlive.com/politics/2025/11/us-border-patrol-agents-are-making-arrests-in-the-portland-area-officials-confirm-what-to-know.html>.

¹⁴ Washington County, *Washington County Declares State of Emergency in Response to Federal Actions* (Nov. 4, 2025), <https://www.washingtoncountyor.gov/bcc/news/2025/11/04/washington-county-declares-state-emergency-response-federal-actions>.

¹⁵ *Id.*

¹⁶ World Population Review, *Washington County* (Accessed on Nov. 10, 2025), <https://worldpopulationreview.com/us-counties/oregon/washington-county#:~:text=State:%20Oregon,Annual%20Population%20Growth>.

¹⁷ Office of Senator Deb Patterson, *Oregon Senator Deb Patterson and Colleagues Request Power Companies Keep Service Connected for Struggling Families* (Nov. 7, 2025), <https://links-2.govdelivery.com/CL0/https:%2F%2Fwww.oregonlegislature.gov%2Fsenatedemocrats%2FDocuments%2FOregon>

These recognized emergencies, which are very much outside the control of impacted families, have made energy security less attainable and put already struggling families in higher risk situations—threatening their access to heat and electricity in winter months and beyond, in addition to the rippling effects of disconnection.¹⁸ All of this is taking place while statewide day-time average temperatures range from 50-60F, with average overnight lows of 30-40F. In the previous program year, there were 59,113 families in Oregon who benefited from LIHEAP.¹⁹ In 2024, in October, November and December, all six utilities collectively disconnected 13,475 households.²⁰ This substantial level of disconnections occurred at a time when LIHEAP funds were available as well as with a moratorium on disconnections due to AR 667 for most of December for Pacific Power and PGE customers enrolled in bill discount programs and/or with medical certificates.²¹

To meet the moment of these compounding crises, the undersigned, joins Oregon’s legislators²² and formally requests this Commission recognize these current crises that threaten households’ access to energy and thus their health and safety, and enact a temporary disconnection moratorium for *all* utilities and *all* households through at least April 1, 2026. If LIHEAP remains unfunded on April 1, then the moratorium should extend through 45 days after Oregon receives LIHEAP funds. Further, this Commission should extend Time Payment Arrangements (TPAs) from 12-months to at least 24-months for debt incurred during the moratorium, with additional flexibility on missed payments, particularly in the summer and winter months.

We appreciate that PGE and Pacific Power have announced a temporary disconnection moratorium through December 31, 2025 for their bill discount program participants and medical certificate customers, respectively. We also learned today, from Senator Deb Patterson’s press release, that NW Natural is adopting a moratorium for low-income qualifying customers until the end of the year, Cascade Natural Gas is suspending collections and disconnections for 30 days

<https://www.oregonlive.com/politics/2025/11/thousands-of-oregonians-may-be-without-heat-as-government-shutdown-continues.html> and <https://www.oregonlive.com/politics/2025/11/thousands-of-oregonians-may-be-without-heat-as-government-shutdown-continues.html> (“Please adopt policies to prevent utility disconnections during the federal government shutdown.”)

¹⁸ As we have discussed throughout AR 671, disconnection threatens households food security, health, housing, among other impacts.

¹⁹ Thousands of LIHEAP Clearing House, *Oregon*, (Accessed on November 10, 2025), <https://liheapch.acf.gov/profiles/Oregon.htm#:~:text=LIHEAP%20Households%20Served%20in%20FY,Weatherization:%20691>; The Oregonian/OregonLive, Destiny Johnson, *Thousands of Oregonians may be without heat as government shutdown continues* (Nov 6, 2025), <https://www.oregonlive.com/politics/2025/11/thousands-of-oregonians-may-be-without-heat-as-government-shutdown-continues.html>.

²⁰ See Docket RO 12

²¹ Docket No. AR 667, *Staff Report for the December 17, 2025 Public Meeting* (Dec. 12, 2024), <https://edocs.puc.state.or.us/efdocs/HAU/ar667hau333510024.pdf>.

²² Docket No. AR 671, *Letter from Legislators to Oregon Public Utility Commissioners Re: Utility Shutoffs Amid the Federal Government Shutdown* (Nov. 7, 2025), <https://edocs.puc.state.or.us/efdocs/HAC/ar671hac341521028.pdf>

for customers who receive financial utility assistance or report being impacted by the shutdown, Avista is providing a 30-day grace period for customers affected by the shutdown, and Idaho Power planned to implement a temporary moratorium on disconnections for shutdown impacted customers until the shutdown ends.²³

Our request here is more comprehensive because the utilities' voluntary actions do not go far enough to sufficiently protect vulnerable households in a uniform and consistent manner that is enforceable by the Commission. For example, these temporary moratoria limit protections through the end of the year. This period would only address disconnections stemming from shoulder season bills in September and October, and some of November, and would not then help families struggling to meet their basic needs in the winter heating season under all of these crises. Further, due to HR 1 and its devastating impacts, the instability of SNAP funding in the face of legal battles, LIHEAP funding remaining over a month delayed and otherwise uncertain, federal employees in Oregon continuing to be laid off,²⁴ and increasing federal immigration activity in Oregon, we request this more comprehensive moratorium extending to April and beyond if LIHEAP still remains unfunded, for all utilities. Doing so will not only help protect the health and safety of households, but will also increase the efficacy of this Commission by adopting a thorough set of standards for all utilities, that addresses forecasted hardships and economic instability for more Oregonians. Otherwise, geography and the lack of alternatives for customers in monopoly utility territory limit protections for many Oregonians, while these hardships are being felt state-wide.

This Commission can and must take action to recognize the state of emergencies many Oregonians are in, particularly those most vulnerable amongst us. Under Oregon Revised Statute (ORS) 756.060, this Commission may adopt and amend reasonable and proper rules and regulations relative to all statutes administered by the Commission. ORS 756.040(2) vests the Commission with power and jurisdiction to supervise and regulate every public utility in this state, and to do all things necessary and convenient in the exercise of such power and jurisdiction.²⁵

Thank you for your consideration.

²³ Oregon State Legislature, *PRESS RELEASE: Oregon Senator Deb Patterson and Colleagues Secure Commitments to Keep Service Connected for Struggling Families* (Nov. 12, 2025), <https://content.govdelivery.com/accounts/ORLEG/bulletins/3fb2dae>.

²⁴ On October 22, 2025, 53 members of the US Congress penned a letter to “utility providers” requesting them to halt disconnections for federal workers during the government shutdown. https://beyer.house.gov/uploadedfiles/member_letter_re_feds_and_utility_bills_and_shutdowns.pdf

²⁵ See also Order 25-411, *supra* note 2.

Sincerely,

/s/ Jamie Pang, Director of Programs
Oregon Just Transition Alliance

/s/ Jess Grady-Benson
Rogue Climate

/s/ Anahi Segovia Rodriguez
Verde

/s/ Brian Stewart
Electrify Now

/s/ Siraat Younas
Community Energy Project

/s/ Kathy Keesee
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/s/ Alessandra de la Torre
NW Energy Coalition

/s/ Eliza Walton
Oregon League of Conservation Voters

/s/ John Maddalena
Self Enhancement, Inc.

/s/ Kelly Campbell
Columbia Riverkeeper

/s/ Nikita Daryanani
Coalition of Communities of Color

/s/ Dr. Cherice Bock
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/s/ Cynthia Ramirez
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/s/ Sam Guthman
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Oregon Environmental Council

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Beyond Toxics

/s/ Tami Darden
Partners for Sustainable Schools

/s/ Dave Cobar
ZERO Coalition

/s/ Claire Prihoda
Climate Solutions

/s/ John Seng
Spark Northwest

/s/ Pat DeLaquil
Clean Energy Commercialization LLC

/s/ Cassie Cohen
Portland Harbor Community Coalition

/s/ Jamie Johnson
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/s/ Alan Journet
Southern Oregon Climate Action Now (SOCAN)

/s/ Robert Hamerly, CEO
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/s/ Angela Donley
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/s/ Danny Noonan
Breach Collective

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Klamath and Lake Community Action Services

/s/ Ariel Knox
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/s/ Meredith Tufts
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/s/ Serena Campas
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Springfield Eugene Tenant Association

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