

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 435

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

VERDE'S CROSS EXAMINATION
STATEMENT AND IDENTIFICATION OF
CROSS-EXAMINATION EXHIBITS

Request for a General Rate Revision.

CROSS EXAMINATION STATEMENT

Pursuant to the Administrative Law Judge (ALJ) ruling issued on September 27, 2024, Verde submits this Cross-Examination Statement and identifies Cross-Examination exhibits for the hearing scheduled for October 10, 2024. Verde reserves cross-examination time for witnesses as detailed below and reserves the right to conduct follow-up cross examinations of any witness who is cross-examined by another party, the ALJ, or the Commissioners.

LIST OF ACTIVE PARTICIPANTS

Tonia Moro or Alex Houston, co-counsel for Verde, will be active participants for the purposes of conducting cross examination and follow-up cross examination of any witnesses that are cross-examined by other parties or the ALJ. Anahi Segovia Rodriguez may attend all sessions and is a qualified individual for confidential materials/sessions.

LIST OF WITNESSES

Witness	Party	Estimated Time	Subject
Kristen Sheeran	PGE	20 minutes Non-confidential	IQBD/Affordability/ EBA/Disconnections/ Procedural equity

Jake Wise	PGE	20 minutes Non-confidential	IQBD/Affordability/ EBA/Disconnections/ Procedural equity
Jackie Ferchland	PGE	20 minutes Non-Confidential	EBA/Adv. No. 24- 19/Disconnections
Robert Macfarlane	PGE	10 minutes Non-Confidential	EBA/Adv. NO. 24- 19

CROSS-EXAMINATION EXHIBITS

Verde submits the following cross-examination exhibits for inclusion in the administrative record.

Exhibit Name	Exhibit Number	Witness	Subject Matter
PGE Filing RE: Advice No. 24-19, Schedule 18, Income Qualified Bill Discount	301	Robert Macfarlane	IQBD/EBA
UM 2211 Arrearage and Disconnection Assessment	303	Kristen Sheeran Jake Wise Jackie Ferchland	Disconnections
PGE to Verde DR 1- 16 Responses	304	Jackie Ferchland Kristen Sheeran	Adv. No 24- 19/IQBD/EBA

These Exhibits are (1) data responses that were received during this proceeding (2) Schedules referenced by PGE in the data responses, and (3) reports related to bill discount, arrearage, and disconnection issues Verde has raised and is prepared to discuss. All relate to the company's Joint Issues List. The Exhibits are attached to this filing.

Verde may rely on additional cross-examination exhibits, depending on discovery

///

responses from PGE. Verde will follow-up with an amended statement providing those cross-examination exhibits as soon as possible.

Dated this 8th day of October, 2024.

/s/ Tonia Moro
Tonia Moro
Of Counsel for Verde



Portland General Electric

121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

September 27, 2024

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

RE: Advice No. 24-19, Schedule 18, Income Qualified Bill Discount

Portland General Electric Company (PGE) submits this filing pursuant to Oregon Revised Statutes 757.205 and 757.210, and Oregon Administrative Rule (OAR) 860-022-0025, for filing proposed tariff sheets associated with Tariff P.U.C. No. 19. with a requested effective date of **March 1, 2025**:

First Revision of Sheet No. 18-1

First Revision of Sheet No. 18-2

As part of the UE 416 Sixth Partial Stipulation to Portland General Electric Company's (PGE or Company) 2024 rate review, OPUC Order No. 23-386 directed PGE to conduct an Energy Burden Assessment (EBA) by June 30, 2024. PGE submitted on June 28, 2024, the results of the Company's 2024 EBA pursuant to that order. Findings were presented to Income Qualified Bill Discount (IQBD) stakeholders on June 25, 2024, and to PGE's Community Benefits & Impacts Advisory Group (CBIAG) on June 26, 2024. Consistent with the terms of the Sixth Partial Settlement, PGE analyzed the assessment's recommendations and is proposing an expansion of its IQBD program accordingly.

PGE's proposed IQBD expansion centers on creation of a new bill discount option for the more than 3,000 households within master-metered affordable housing in PGE's service area. This population segment is disproportionately comprised of low-income and other environmental justice communities but is not currently eligible for IQBD. In addition, PGE proposes a transition to a targeted post-enrollment verification approach in line with EBA recommendations and input from stakeholders that will make post-enrollment verification less burdensome and more effective.

As PGE will lay out in a forthcoming update to be filed in Docket UM 2211, we are pursuing a suite of concrete actions beyond these tariff changes to improve IQBD and other program offerings in direct response to EBA recommendations. This approach reflects PGE's view, informed by the EBA, that the current IQBD design appropriately balances meaningful assistance to energy burdened customers, streamlined customer enrollment, and a manageable cost burden to PGE's customer base, and that the highest priority over the coming year is in improving customer participation rates in IQBD as well as other assistance and bill reduction programs.

PGE Advice No. 24-19, Schedule 18, Income Qualified Bill Discount
Page 2

The revisions to Schedule 18 update the program and applicability to include non-residential customers under a new special condition. Special Condition 8 allows for master-metered buildings consisting of individual residents. Monthly discount tiers remain for residential customers and a new discount of 25% is applicable to eligible master-metered non-residential customers. In addition, these updates provide clarity that the bill discounts are applied prior to taxes and do not apply to Schedule 300 Charges as defined by the Rules and Regulations and Miscellaneous Charges or optional charges. Language is also updated on enrollment and eligibility.

Additionally, PGE has proposed changes to remove the requirement to conduct fully randomized post-enrollment verification. PGE intends to engage Staff, stakeholders and the CBIAG in advance of the next annual post-enrollment verification cycle to seek input on criteria to apply in an updated, targeted post-enrollment verification approach. The March 1, 2025 effective date is driven by the need to update building systems and program details in advance of launching the program for master-metered customers and the timing of PGE's annual post-enrollment verification process. Following Commission approval of this filing, PGE will work with OHCS in advance of the tariff effective date to identify potentially eligible customers and conduct outreach and enrollment efforts.

A redline version of Schedule 18 is included as a courtesy.

To satisfy the requirements of OARs 860-022-0025(2), PGE provides the following responses:

Beyond the bill discounts provided to participating Residential Customers, there are no price impacts to PGE Customers associated with this Schedule 18 update. Cost recovery for IQBD is implemented in Schedule 118, to be updated in a future advice filing.

Please direct questions to Ashleigh Keene at ashleigh.keene@pgn.com. Please direct all formal correspondence and requests to the following email address pge.opuc.filings@pgn.com.

Sincerely,

\s\ Robert Macfarlane

Robert Macfarlane
Manager, Pricing and Tariffs

Enclosures
cc: UE 416 Service List

PGE Advice No. 24-19

Courtesy Redline of Schedule 18

SCHEDULE 18
INCOME-QUALIFIED BILL DISCOUNT - OPTIONAL

PROGRAM DESCRIPTION

This is an optional bill discount for Income-Qualified Residential customers and Non-Residential Customers that qualify under Special Condition 8 of this schedule. This discount is enabled by House Bill 2475, which modified ORS 757.230 to allow for differentiated rates on the basis of affordability factors.

(C)
|
(C)

AVAILABLE

In all territory served by the Company.

APPLICABLE

To Income-Qualified Residential Customers with gross household income at or below 60% of Oregon State Median Income (SMI), adjusted for household size. For Customers in single-person households, eligibility is extended to those with gross household incomes up to the greater of 60% SMI or full-time wages at the Portland Metro minimum wage. Also applicable to Non-Residential Customers that qualify under Special Condition 8 of this schedule.

(C)

(C)
(C)

MONTHLY DISCOUNT

Monthly bill discounts are calculated as a percentage of bill. Residential Customer discounts are offered at five levels, based on the enrolled Customer's household income as a percentage of SMI.

(C)

Tier	Eligible Percent of SMI	Discount Percentage
A	0-5%	60%
B	6-15%	40%
C	16-30%	25%
D	31-45%	20%
E ¹	46-60%	15%

1. Tier E includes, for single-person households, customers with gross household incomes up to the greater of 60% SMI or full-time wages at the Portland Metro minimum wage.

Enrolled Customers with a verified Emergency Medical Certificate on their PGE account will be moved to the next highest discount level, if not already qualified for the highest discount level.

Discounts for Non-Residential Customer that qualify under Special Condition 8 will receive a 25% discount.

(N)
(N)

Bill discounts are applied prior to taxes and do not apply to Schedule 300 or optional charges.

(C)

(D)

SCHEDULE 18 (Concluded)

SPECIAL CONDITIONS

1. Program participants must be the accountholder.
2. Household size reflects all permanent residents in the home, including adults and children.
3. Qualifying income refers to total gross annual income, both taxable and nontaxable, from all sources for all persons in the applicant's household.
4. The discount applies only to bills associated with the Customer's permanent primary residence and only to new charges billed after enrollment.
5. PGE Customers who have qualified for the federal Low-Income Home Energy Assistance Program (LIHEAP) or the Oregon Energy Assistance Program (OEAP) and not already enrolled will be automatically enrolled or their discount level will be updated into the appropriate tier if already enrolled. Those who also have a verified Emergency Medical Certificate on their PGE account will automatically be enrolled into the next highest tier, unless they are already eligible for Tier A. Customers who do not wish to receive the discount can contact PGE to be unenrolled. (C)
| (C)
(T)
6. Customers not otherwise automatically enrolled may participate in the program after the approval of an application that includes a declaration of household size and income. Applications can be submitted directly by the Customer or a third-party on behalf of the Customer. Re-enrollment will be required every two years.
7. PGE will require post-enrollment verification of need of no more than 3% of annually enrolled Customers. Those identified for post-enrollment verification will be selected by PGE from participants who were not automatically enrolled or re-enrolled based on their verified eligibility for LIHEAP/OEAP. Customers selected must verify eligibility to continue receiving this discount. If a Customer's discount is discontinued due to non-responsiveness or ineligibility, they may re-enroll upon providing verification of eligibility. Customers who were automatically enrolled based on LIHEAP or OEAP eligibility are exempt from post-enrollment verification. (C)
| (C)
8. The Non-Residential discount is available for master-metered buildings consisting of individual residential units, served under a Non-Residential rate schedule and meeting the following criteria: (N)
|
 - a. At least 50% or greater of the dwelling units are dedicated to occupants whose income is at 60% or less of state median income;
 - b. Must qualify as affordable housing with Oregon Housing and Community Services as defined in OAR 330-240-0070(1); and
 - c. The master-metered customer must attest that it will pass its monthly bill discount back to its low-income occupants on a proportional basis. (N)

SCHEDULE 18 INCOME-QUALIFIED BILL DISCOUNT - OPTIONAL

PROGRAM DESCRIPTION

This is an optional bill discount for Income-Qualified Residential customers and Non-Residential Customers that qualify under Special Condition 8 of this schedule. This discount is enabled by House Bill 2475, which modified ORS 757.230 to allow for differentiated rates on the basis of affordability factors.

AVAILABLE

In all territory served by the Company.

APPLICABLE

To Income-Qualified Residential Customers, ~~defined as Customers~~ with gross household income at or below 60% of Oregon State Median Income (SMI), adjusted for household size. For Customers in single-person households, eligibility is extended to those with gross household incomes up to the greater of 60% SMI or full-time wages at the Portland Metro minimum wage. Also applicable to Non-Residential Customers that qualify under Special Condition 8 of this schedule.

MONTHLY DISCOUNT

Monthly bill discounts are calculated as a percentage of bill. Residential Customer discounts are offered at five levels, based on the enrolled Customer's household income as a percentage of SMI.

Tier	Eligible Percent of SMI	Discount Percentage
A	0-5%	60%
B	6-15%	40%
C	16-30%	25%
D	31-45%	20%
E ¹	46-60%	15%

1. Tier E includes, for single-person households, customers with gross household incomes up to the greater of 60% SMI or full-time wages at the Portland Metro minimum wage.

Enrolled Customers with a verified Emergency Medical Certificate on their PGE account will be moved to the next highest discount level, if not already qualified for the highest discount level.

Discounts for Non-Residential Customer that qualify under Special Condition 8 will receive a 25% discount.

~~The bill discounts are applied prior to taxes and do not apply to Schedule 300 or optional charges. -applies to most components of a Customer's bill, with a small number of charges not subject to the discount. Excluded charges include the following, where applicable:~~

- ~~• Green Future Solar, Fixed and Habitat Optional Charges~~
- ~~• Solar Customer Charge for Customers on Solar Payment Option~~
- ~~• Energy Efficiency Funding Adjustment (Schedule 109)~~
- ~~• Low Income Assistance Charge (Schedule 115)~~

• ~~Meter Rental and Non-Network Meter Read Charges (Schedule 300)~~

~~1. Tier E includes, for single person households, customers with gross household incomes up to the greater of 60% SMI or full-time wages at the Portland Metro minimum wage.~~

Advice No. 24-19

Issued September 27, 2024

Larry Bekkedahl, Vice President

**Effective for service
on and after March 1, 2025**

SCHEDULE 18 (Concluded)

SPECIAL CONDITIONS

1. Program participants must be the accountholder.
2. Household size reflects all permanent residents in the home, including adults and children.
3. Qualifying income refers to total gross annual income, both taxable and nontaxable, from all sources for all persons in the applicant's household.
4. The discount applies only to bills associated with the Customer's permanent primary residence and only to new charges billed after enrollment.
5. PGE Customers who have qualified for the federal Low-Income Home Energy Assistance Program (LIHEAP) or the Oregon Energy Assistance Program (OEAP) and not already enrolled will be automatically enrolled or their discount level will be updated into the appropriate tier if already enrolled. Those who also have a verified Emergency Medical Certificate on their PGE account will automatically be enrolled into the next highest tier, unless they are already eligible for Tier A-. Customers who do not wish to receive the discount can contact PGE to be unenrolled.
6. Customers not otherwise automatically enrolled may participate in the program after the approval of an application that includes a declaration of household size and income. Applications can be submitted directly by the Customer or a third-party on behalf of the Customer. Re-enrollment will be required every two years.
7. PGE will require post-enrollment verification of need ~~from a randomly~~ of no more than 3% of annually enrolled Customers. selected 3% of enrolled Customers annually to continue receiving this discount. Those identified for post-enrollment verification will be ~~randomly selected~~ by PGE from among participants who were not automatically enrolled or re-enrolled based on their verified eligibility for LIHEAP/OEAP. Customers selected must verify eligibility to continue receiving this discount. If a Customer's discount is discontinued due to non-responsiveness or ineligibility, they may re-enroll upon providing verification of eligibility. Customers who were automatically enrolled based on LIHEAP or OEAP eligibility are exempt from post-enrollment verification.
8. The Non-Residential discount is available for master-metered buildings consisting of individual residential units, served under a Non-Residential rate schedule and meeting the following criteria:
 - a. At least 50% or greater of the dwelling units are dedicated to occupants whose income is at 60% or less of state median income;
 - b. Must qualify as affordable housing with Oregon Housing and Community Services as defined in OAR 330-240-0070(1); and
 - c. The master-metered customer must attest that it will pass its monthly bill discount back to its low-income occupants on a proportional basis.

Arrearage and Disconnection Assessment

Docket No. UM 2211: HB 2475 Implementation of Differential Rates and Programs in Oregon

Staff's Phase 2 Update ([Phase 2 Work Plan Update](#)) filed by Staff in Docket UM 2211 in August 2024 announced Staff's interest in investigating and addressing the potential immediate need for action to address rising disconnections and arrearages observed in 2024.

Staff launched a revised work stream in the Phase 2 process specifically targeted at mitigating customer harms associated with arrearages and disconnection. This document provides the first part of this process, Staff's Regulated Energy Utility Arrearage and Disconnection Assessment. The assessment provides a high-level data visualization and resource tool that includes:

- [Summarized energy security metrics and information](#) on residential arrearage and disconnection activity across Oregon regulated energy utilities
- Utility disconnection practices ([Attachment A](#))
- An overview of notable information, and proposals shared by parties in recent energy burden assessments (EBAs) and general rate case proceedings related to arrearages and disconnections ([Attachment B](#))
- An overview of the recommended rule changes resulting from AR 653, Revision to Division 21 Rules to Strengthen Customer Protections Concerning Disconnections, as well as a summary of party comments in the final two rounds of commenting ([Attachment C](#))

Staff offers the following information as a starting point for additional conversations with utilities, stakeholders and Staff in upcoming workshops, written comment opportunities, and discussions on solutions and upcoming Proposals for Action.

Staff hopes that this information will provide a starting point for outcomes-based discussion of near-term concerns and opportunities. Staff's intent is to use this process to inform recommendations that are responsive to concerns and identified gaps in customer arrearage management options and disconnection protections. Staff will bring these recommendations before the Commission in November.

If you have questions about the HB 2475 phase 2 process or schedule, please contact Kate Ayres, kate.ayres@puc.oregon.gov or 503-510-9611.

/s/ Kate Ayres





The following provides a high-level overview of the state of arrearages and disconnections across Oregon's regulated investor-owned energy utilities through May 2024. This is meant to inform the second phase of Docket UM 2211, Staff's coordinated HB 2475 implementation effort.

Contents

- **Arrearage Levels**
 - Residential Customer Arrears Data
 - Low-Income Residential Arrearage Data
 - Aging Arrears Trends
 - Existing Arrearage Management
- **Disconnections**
 - Residential Disconnections
 - Low-Income Disconnections
- **Utility Disconnection Practices (*Attachment A*)**
- **AR 653 Overview** (2021 Division 21 Rulemaking for Enhanced Disconnection Protection; *Attachment B*)
- **2024 General Rate Case & Energy Burden Assessment Recommendations** (Arrearage and disconnection Recommendations Summary; *Attachment C*)

Who?

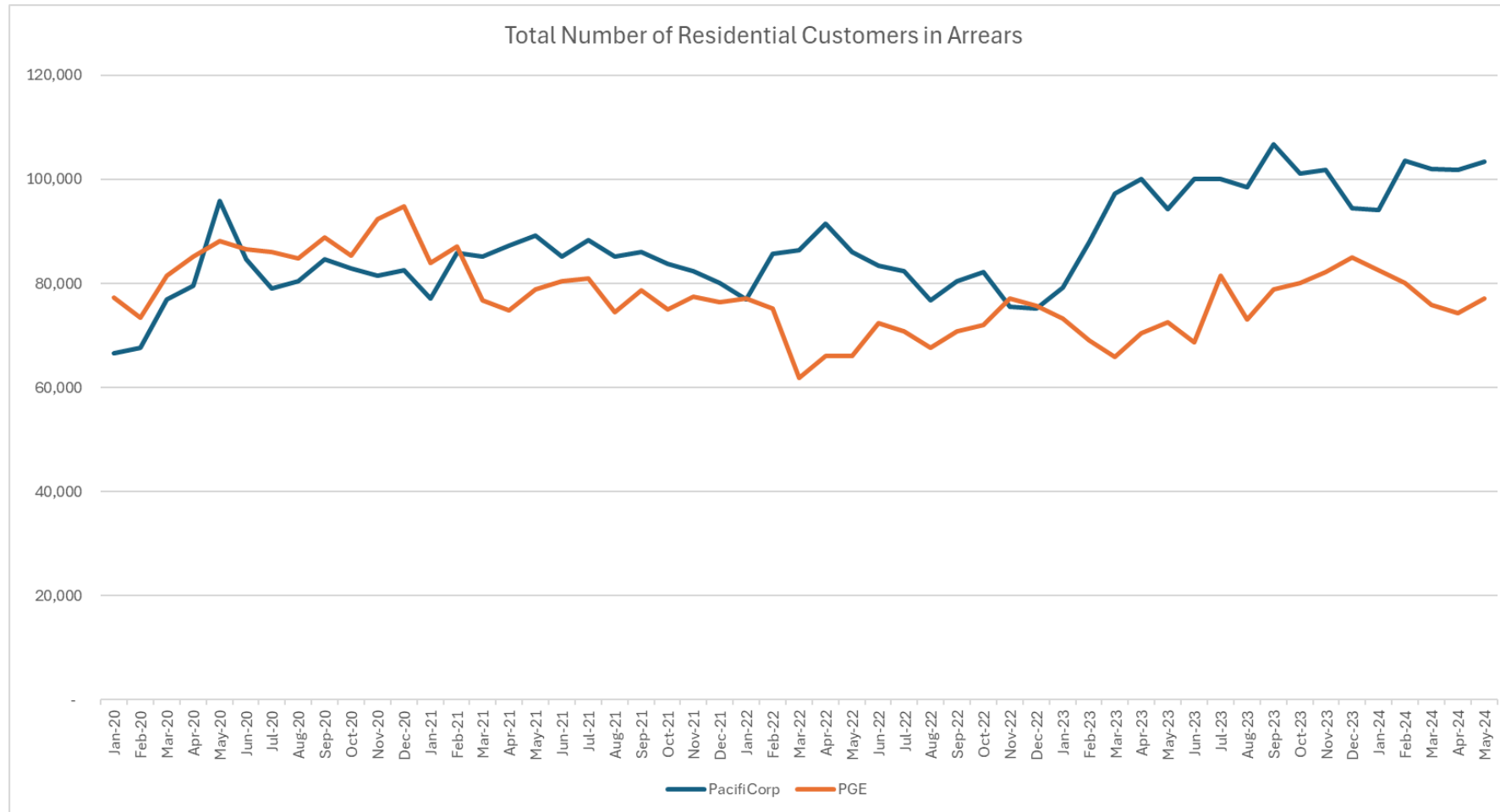
- Portland General Electric
- PacifiCorp
- Idaho Power Company
- NW Natural Gas
- Avista Utilities
- Cascade Natural Gas

What are “arrears”?

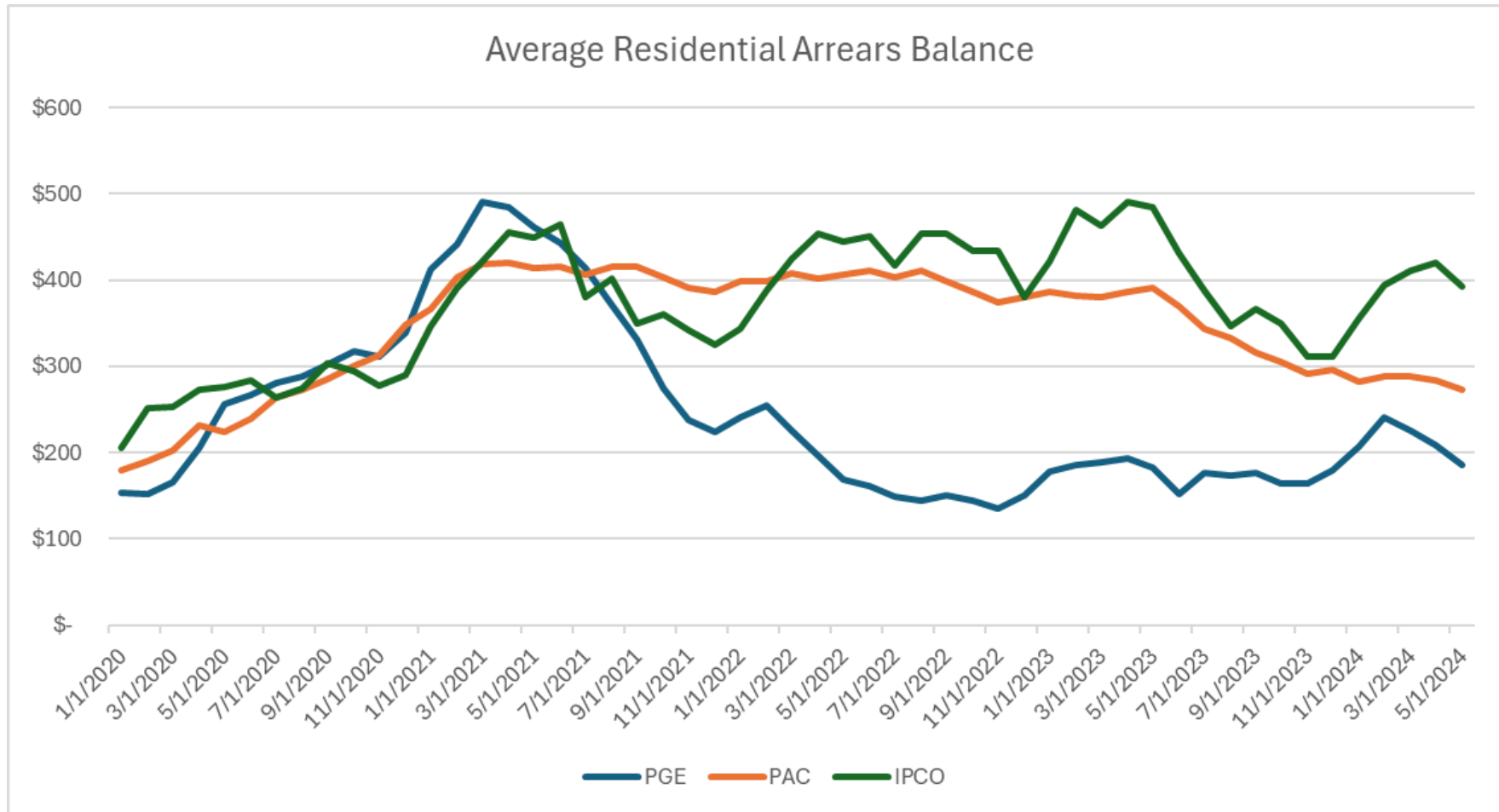
- Utility **arrears** refer to overdue payments that a customer has not paid by the due date.
- These unpaid amounts can accumulate over time and be reflected in the customers account balance

Arrearage Levels

Count of Residential Customers in Arrears

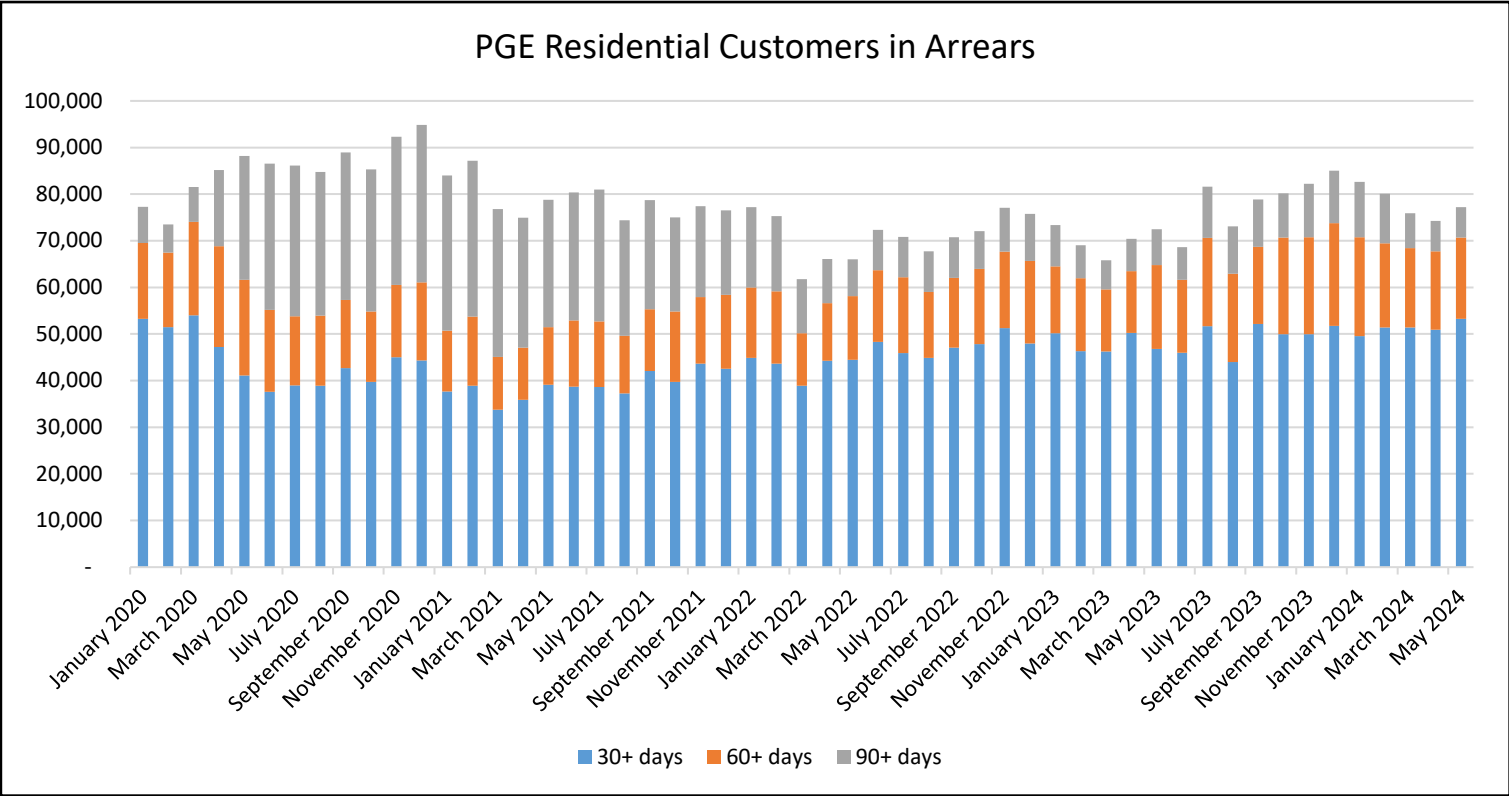


Average Residential Customer Arrearage Balance



Count of Residential Customers in Arrears (#)

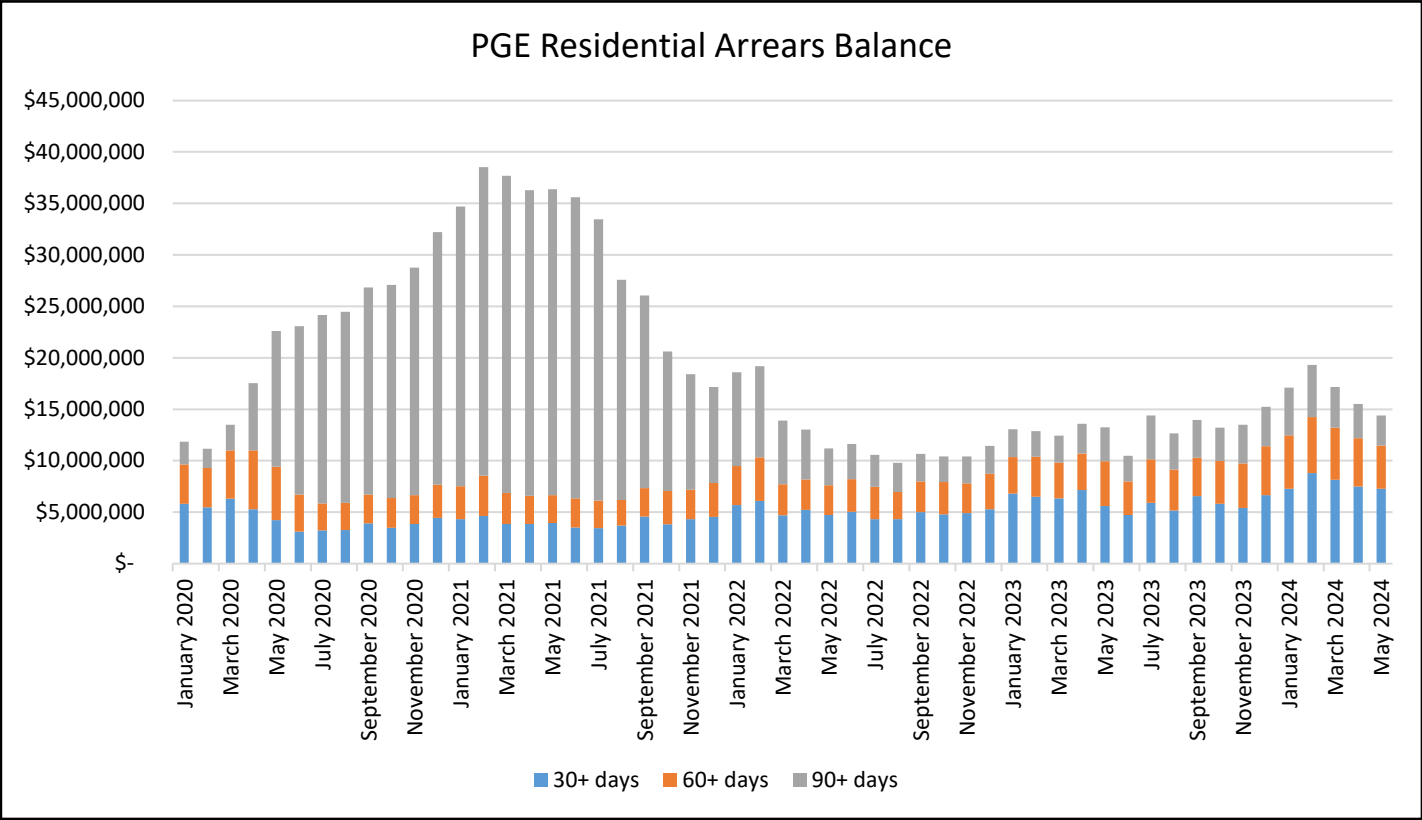
Number of Occupied Households
~800,000



As of May 2024, roughly **10%** of PGE customers are in arrears

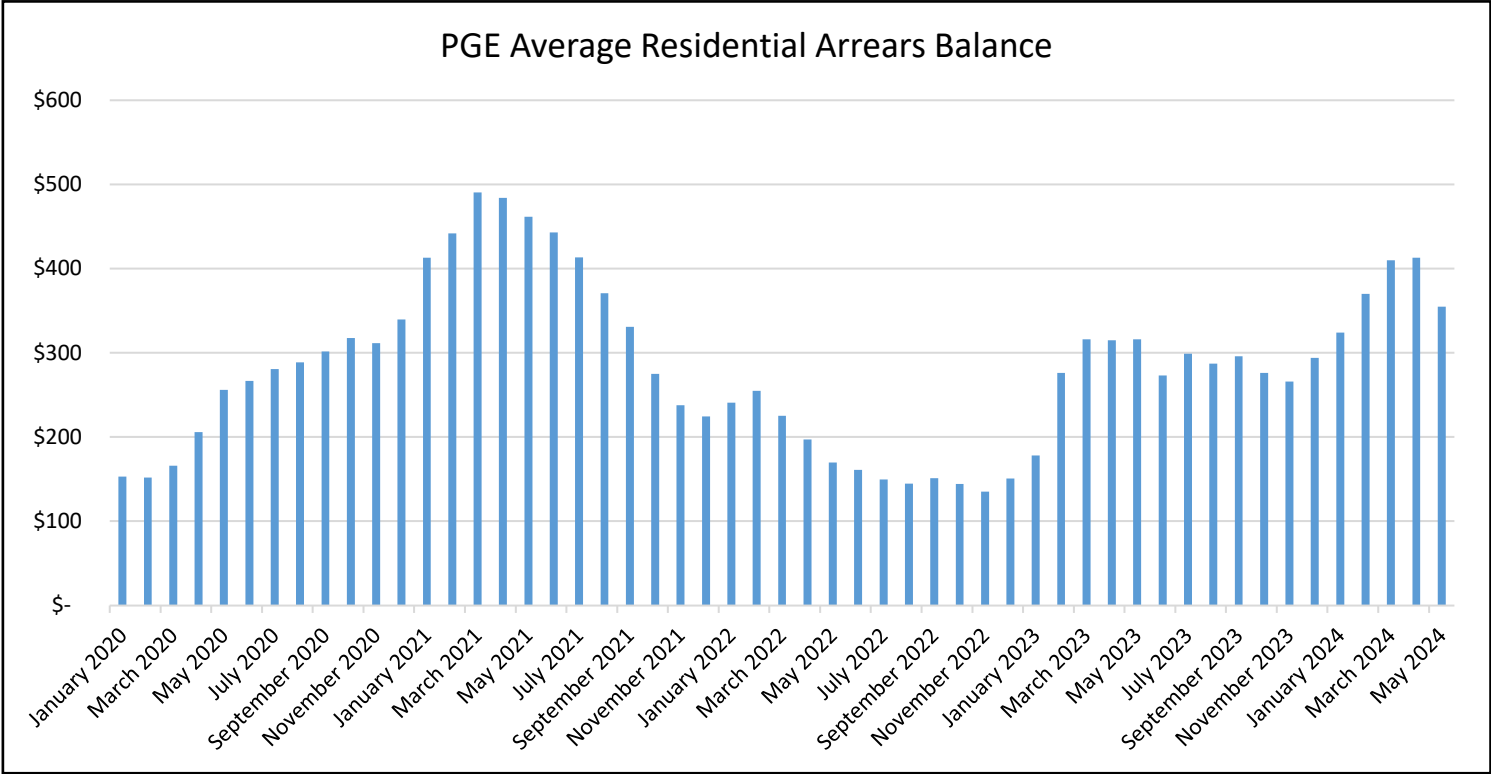
Customers in Arrears				
Month	30+ days	60+ days	90+ days	Total
July 2023	51,690	18,930	10,949	81,569
August 2023	43,969	18,978	10,120	73,067
September 2023	52,114	16,555	10,156	78,825
October 2023	49,977	20,671	9,476	80,124
November 2023	49,978	20,788	11,468	82,234
December 2023	51,745	22,022	11,283	85,050
January 2024	49,549	21,168	11,897	82,614
February 2024	51,407	18,044	10,605	80,056
March 2024	51,405	17,040	7,424	75,869
April 2024	50,883	16,828	6,550	74,261
May 2024	53,272	17,397	6,527	77,196

Total Residential Arrearages (\$)



Arrears Balance				
Month	30+ days	60+ days	90+ days	Total
July 2023	5,914,355	4,229,706	4,241,164	14,385,224
August 2023	5,172,098	3,981,891	3,508,696	12,662,685
September 2023	6,560,324	3,733,146	3,663,902	13,957,371
October 2023	5,816,445	4,167,218	3,232,575	13,216,238
November 2023	5,406,100	4,328,447	3,755,535	13,490,082
December 2023	6,663,999	4,737,402	3,841,817	15,243,218
January 2024	7,291,034	5,176,397	4,623,533	17,090,964
February 2024	8,806,547	5,423,772	5,078,944	19,309,263
March 2024	8,141,575	5,086,897	3,921,173	17,149,645
April 2024	7,480,511	4,694,082	3,336,620	15,511,213
May 2024	7,284,274	4,175,609	2,923,294	14,383,177

Average Residential Arrears Balance (\$)



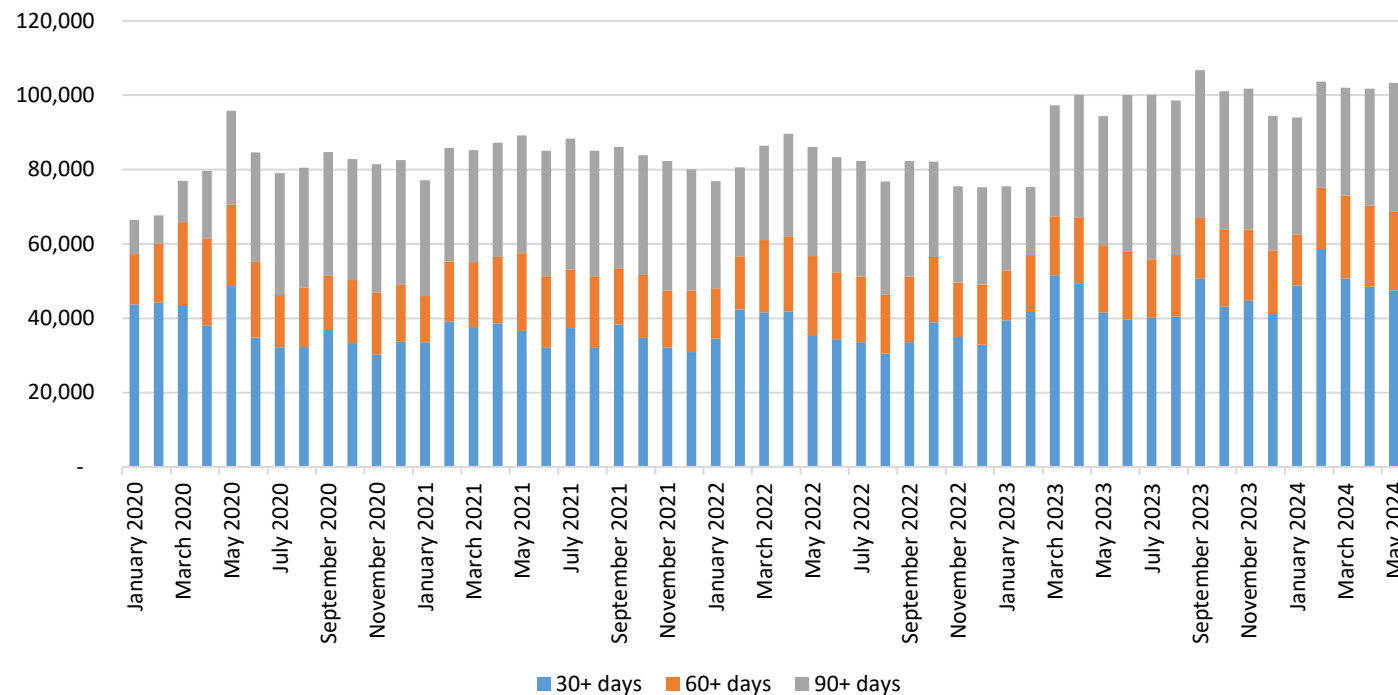
Average Residential Arrearage Balance			
	31-60 Days	61-90 Days	91+ Days
July 2023	\$ 122	\$ 273	\$ 509
August 2023	\$ 130	\$ 229	\$ 503
September 2023	\$ 134	\$ 258	\$ 500
October 2023	\$ 129	\$ 228	\$ 480
November 2023	\$ 121	\$ 245	\$ 438
December 2023	\$ 149	\$ 248	\$ 495
January 2024	\$ 169	\$ 286	\$ 529
February 2024	\$ 197	\$ 348	\$ 576
March 2024	\$ 186	\$ 368	\$ 689
April 2024	\$ 177	\$ 345	\$ 731
May 2024	\$ 159	\$ 284	\$ 636

Count of Residential Customers in Arrears (#)

Number of Occupied
Households

~510,000

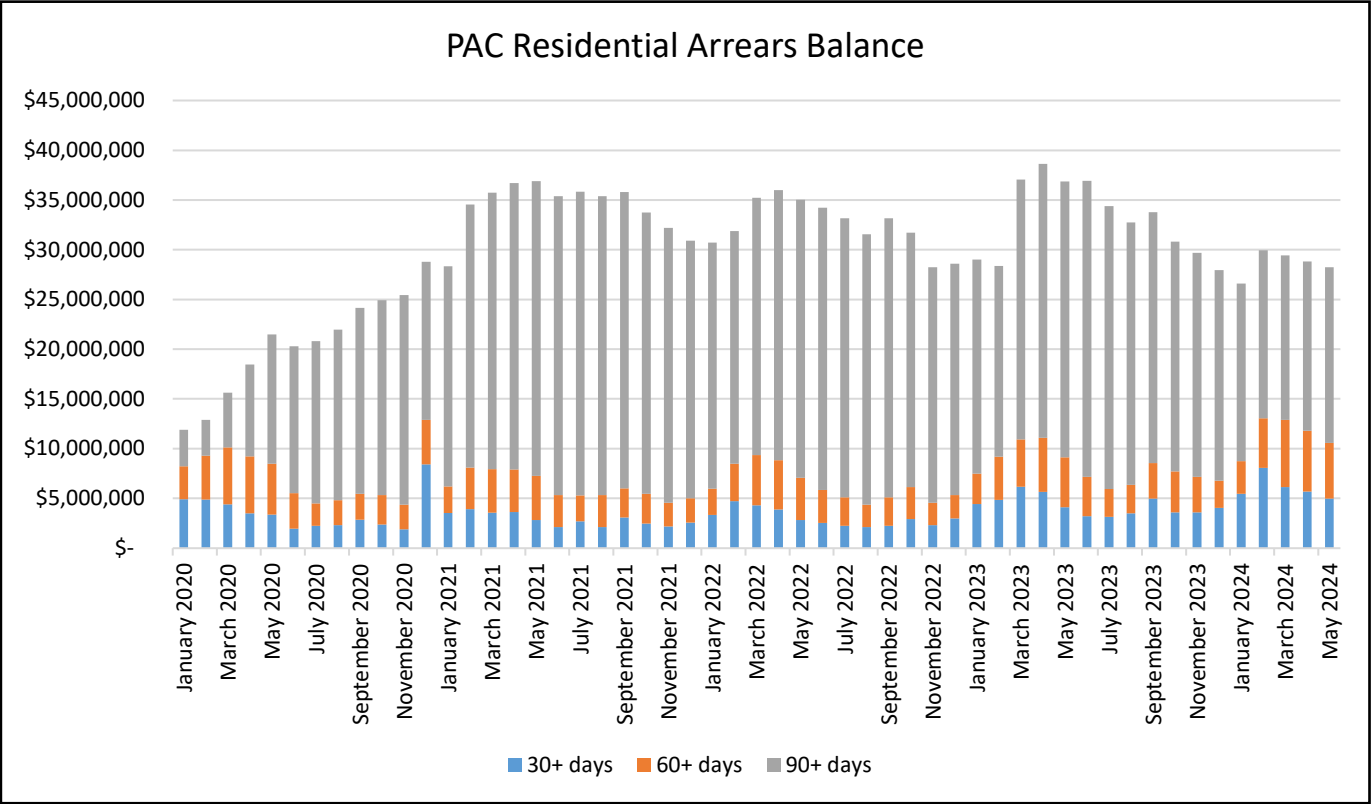
PAC Residential Customers in Arrears



As of May 2024, roughly **20%** of PAC customers are in arrears

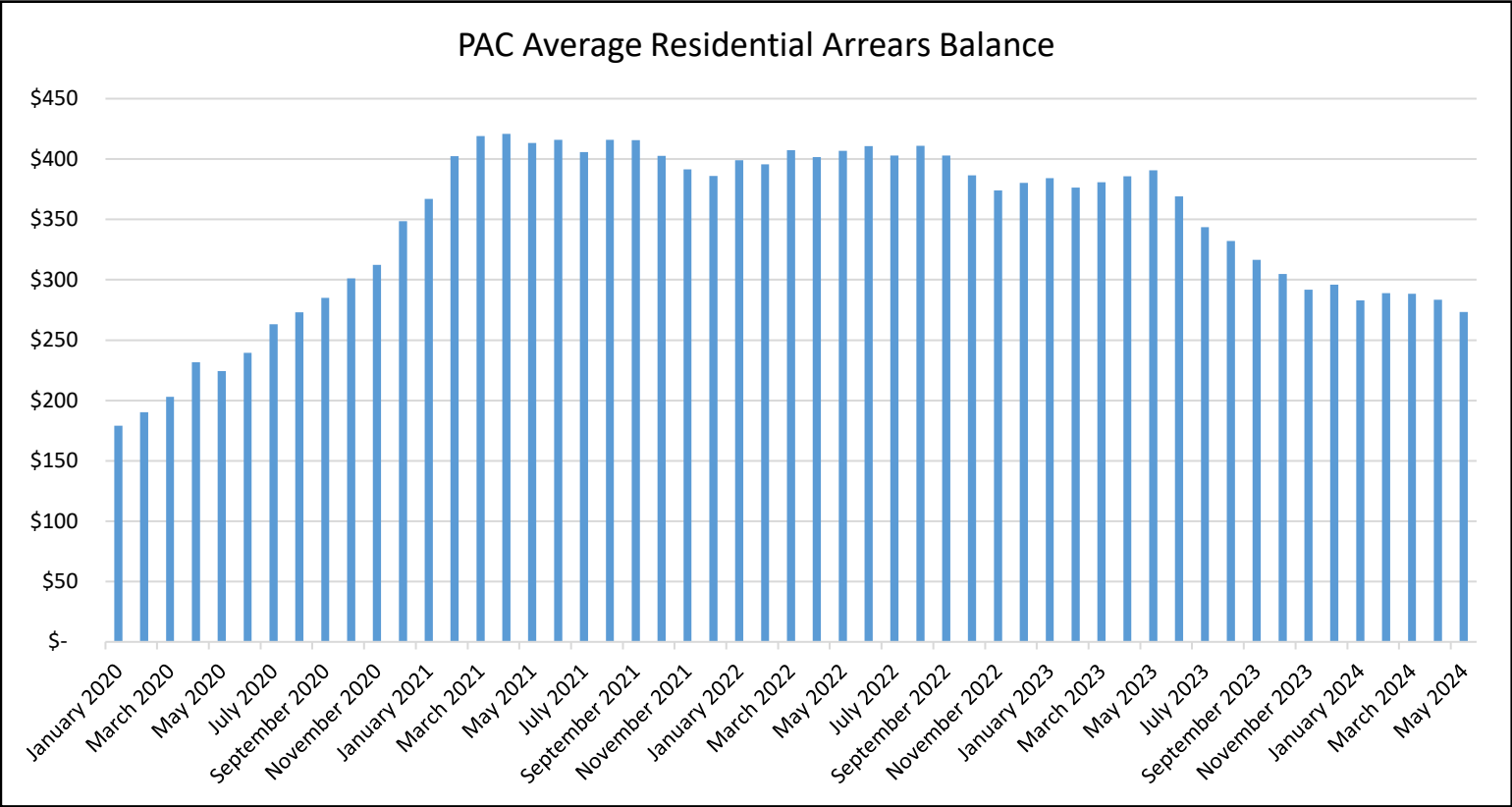
Customers in Arrears				
Month	30+ days	60+ days	90+ days	Total
July 2023	40,148	15,739	44,246	100,133
August 2023	40,514	16,470	41,564	98,548
September 2023	50,662	16,371	39,713	106,746
October 2023	43,139	20,766	37,201	101,106
November 2023	44,664	19,220	37,895	101,779
December 2023	41,469	16,801	36,194	94,464
January 2024	48,863	13,708	31,462	94,033
February 2024	58,636	16,556	28,424	103,616
March 2024	50,687	22,354	28,959	102,000
April 2024	48,527	21,777	31,446	101,750
May 2024	47,553	21,212	34,564	103,329

Total Residential Arrearages (\$)



Arrears Balance				
Month	30+ days	60+ days	90+ days	Total
July 2023	3,122,836	\$ 2,826,927	\$ 28,452,059	\$ 34,401,822
August 2023	3,501,677	\$ 2,871,449	\$ 26,371,717	\$ 32,744,844
September 2023	4,970,398	\$ 3,569,562	\$ 25,237,602	\$ 33,777,562
October 2023	3,577,151	\$ 4,127,185	\$ 23,109,114	\$ 30,813,450
November 2023	3,584,416	\$ 3,584,375	\$ 22,531,737	\$ 29,700,529
December 2023	4,048,027	\$ 2,733,975	\$ 21,165,527	\$ 27,947,529
January 2024	5,468,655	\$ 3,263,849	\$ 17,870,179	\$ 26,602,683
February 2024	8,067,931	\$ 4,998,621	\$ 16,868,830	\$ 29,935,383
March 2024	6,129,392	\$ 6,747,400	\$ 16,553,534	\$ 29,430,326
April 2024	5,686,525	\$ 6,114,093	\$ 17,030,576	\$ 28,831,194
May 2024	4,979,681	\$ 5,608,450	\$ 17,649,405	\$ 28,237,536

Average Residential Arrears Balance (\$)

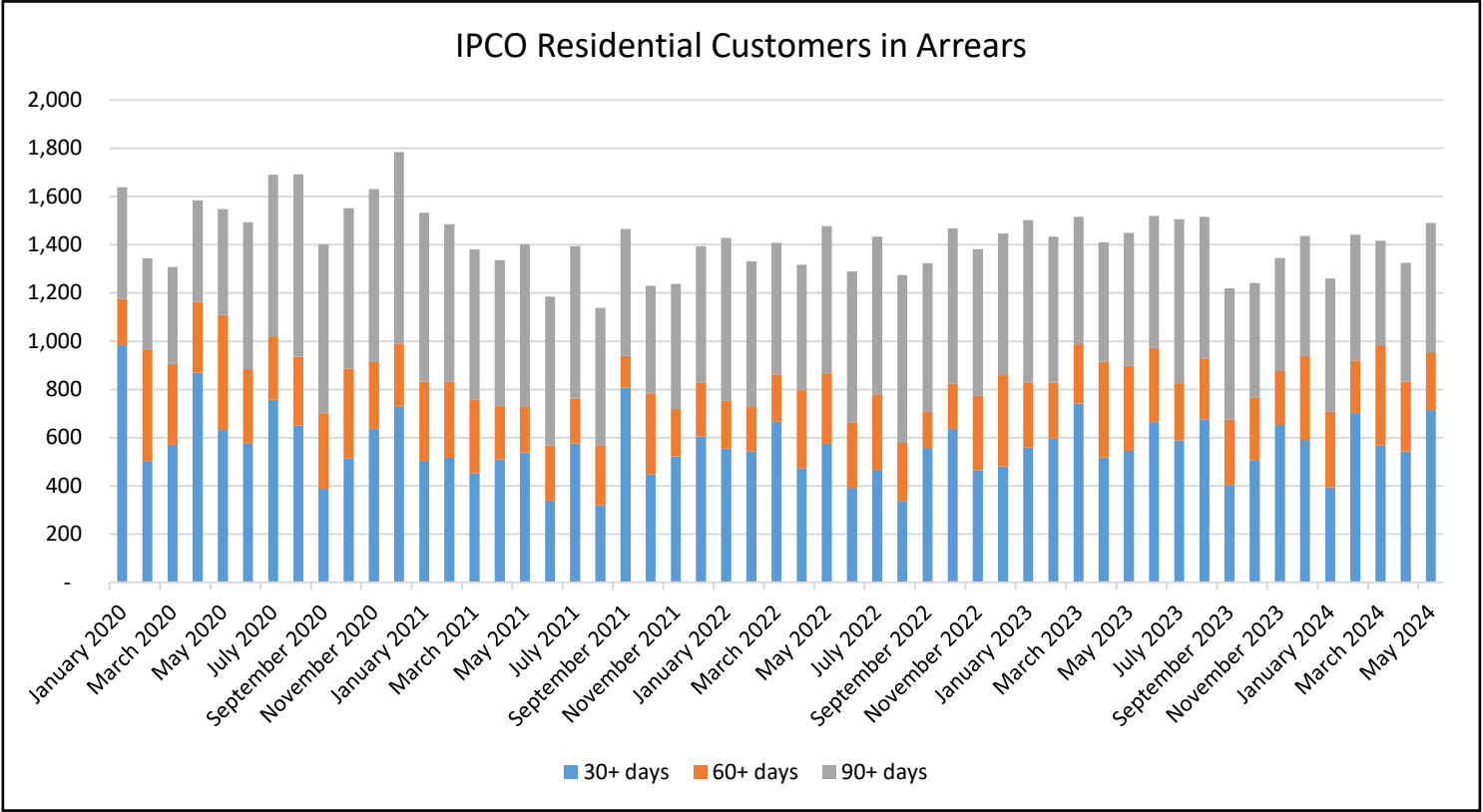


Average Residential Arrearage Balance			
	31+ Days	61+ Days	91+ Days
July 2023	\$ 344	\$ 521	\$ 643
August 2023	\$ 332	\$ 504	\$ 634
September 2023	\$ 316	\$ 514	\$ 635
October 2023	\$ 305	\$ 470	\$ 621
November 2023	\$ 292	\$ 457	\$ 595
December 2023	\$ 296	\$ 451	\$ 585
January 2024	\$ 283	\$ 468	\$ 568
February 2024	\$ 289	\$ 486	\$ 593
March 2024	\$ 289	\$ 454	\$ 572
April 2024	\$ 283	\$ 435	\$ 542
May 2024	\$ 273	\$ 417	\$ 511

Count of Residential Customers in Arrears (#)

Number of Households

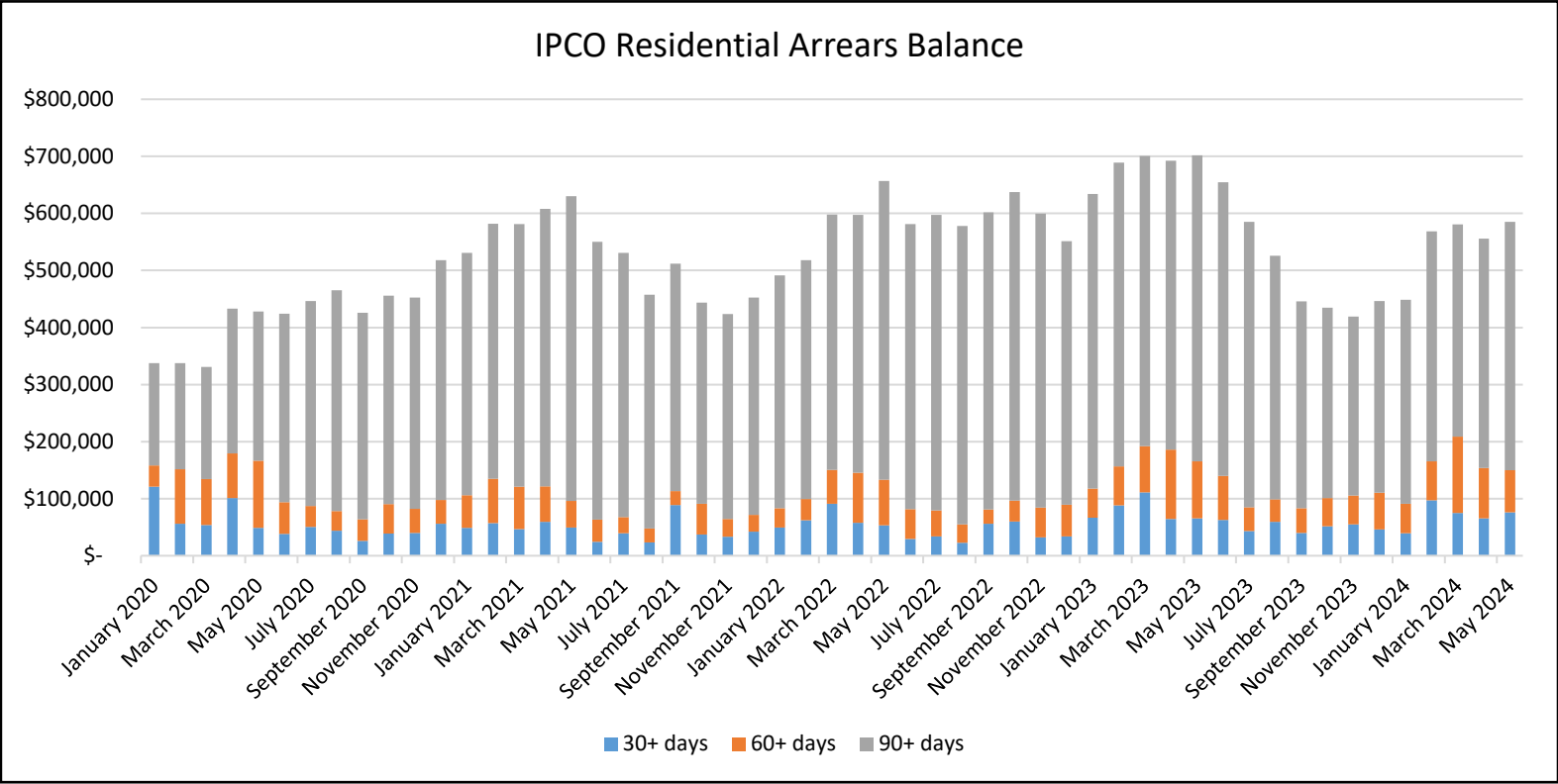
~12,800



Customers in Arrears				
Month	30+ days	60+ days	90+ days	Total
July 2023	589	237	680	1,506
August 2023	676	252	587	1,515
September 2023	404	271	544	1,219
October 2023	507	258	476	1,241
November 2023	653	223	469	1,345
December 2023	591	348	497	1,436
January 2024	393	315	552	1,260
February 2024	703	217	521	1,441
March 2024	568	416	432	1,416
April 2024	543	289	493	1,325
May 2024	715	239	536	1,490

Customers are placed in their age bucket by their oldest outstanding balance. This is done to ensure that the customer is represented in only one age bucket. Because of this, their total outstanding balance is also represented in only one age bucket, the age bucket of their oldest outstanding balance.

Total Residential Arrearages (\$)



Arrears Balance				
Month	30+ days	60+ days	90+ days	Total
July 2023	\$ 43,785	\$ 41,436	\$ 500,083	\$ 585,304
August 2023	\$ 59,830	\$ 39,401	\$ 426,721	\$ 525,952
September 2023	\$ 39,926	\$ 43,308	\$ 362,619	\$ 445,853
October 2023	\$ 52,037	\$ 49,183	\$ 333,449	\$ 434,670
November 2023	\$ 55,037	\$ 50,908	\$ 313,401	\$ 419,346
December 2023	\$ 46,092	\$ 64,366	\$ 336,091	\$ 446,549
January 2024	\$ 39,546	\$ 51,837	\$ 357,326	\$ 448,708
February 2024	\$ 97,357	\$ 68,278	\$ 402,909	\$ 568,544
March 2024	\$ 75,100	\$ 133,862	\$ 372,017	\$ 580,979
April 2024	\$ 65,498	\$ 88,656	\$ 401,828	\$ 555,982
May 2024	\$ 76,484	\$ 73,699	\$ 435,150	\$ 585,333

Low-Income Arrears

Low-Income (LI) Residential Arrears Metrics

Verde 302/ 19

Low-Income Residential Customers Arrears (Average, Maximum, Minimum)			
Utility	Average Arrears Balance	Maximum Balance	Minimum Balance
PGE *As of 4/30/24	\$228	\$19,821	<\$1
PacifiCorp *As of 5/9/24	\$504.46	\$24,897.97	\$0.01
NW Natural	\$182.16	\$4,051.81	\$0.01
Avista	\$131.38	\$3,955.69	\$0.02
Cascade	\$122.01	\$2,598.07	\$0.06

PGE LI Arrears

IQBD Tier Enrollments as of July 2021					
60%	40%	25%	20%	15%	Total
11,059	8,069	25,503	23,466	16,927	85,024

IQBD Participant Arrearage Information (RE 195)

Arrearage Information for IQBD Enrolled Customers					
	Jul-24				
Discount Tier	60%	40%	25%	20%	15%
Customers in arrears (%) *					
31-60 days	14%	16%	14%	13%	13%
61-90 days	11%	10%	8%	8%	7%
91+ days	9%	7%	4%	3%	3%
Average arrears (\$)					
31-60 days	\$84	\$114	\$118	\$127	\$130
61-90 days	\$46	\$57	\$46	\$46	\$45
91+ days	\$41	\$51	\$32	\$30	\$21
Total arrears (\$) **					
31-60 days	\$139,979	\$146,956	\$405,408	\$379,917	\$276,328
61-90 days	\$104,934	\$98,123	\$268,230	\$257,835	\$185,050
91+ days	\$61,176	\$55,322	\$98,500	\$70,927	\$41,684
Recipients of Energy Asst. in past 12-months (%)	43%	46%	24%	24%	15%

NW Natural LI Arrears

BDP Tier Enrollments as of June 2024				
15%	20%	25%	40%	Total
17,274	12,626	10,873	7,508	48,281

Verde 302/21

NWN BDP Participant Arrearage Information (RG 102)

Arrearage Information for NWN BDP Enrolled Customers				
	Jun-24			
Discount Tier	15%	20%	25%	40%
Customers in arrears (%) *				
31-60 days	14%	16%	14%	13%
61-90 days	11%	10%	8%	8%
91+ days	9%	7%	4%	3%
Average arrears (\$)				
31-60 days	\$24	\$26	\$23	\$20
61-90 days	\$22	\$24	\$22	\$20
91+ days	\$39	\$45	\$43	\$50
Total arrears (\$) **				
31-60 days	\$277,295	\$244,777	\$190,407	\$112,946
61-90 days	\$250,072	\$230,085	\$181,000	\$112,504
91+ days	\$448,825	\$427,035	\$364,225	\$283,520

Aging Arrears Trends

Aging Arrears Trends

Verde 302/ 23

Year	(a) From 30-60 days to higher bucket		(b) From 60-90 days to higher bucket	
	<i>All arrearage customers</i>	<i>IQBD participants</i>	<i>All arrearage customers</i>	<i>IQBD participants</i>
2022*	1.58%	4.98%	0.58%	2.09%
2023	1.64%	5.94%	0.57%	2.35%
2024	1.57%	5.42%	0.55%	2.21%

*Data from January-March 2022 was not included for IQBD participants as this was prior to the start of IQBD.

PacifiCorp

Year	(a) From 30-60 days to higher bucket		(b) From 60-90 days to higher bucket	
	<i>All arrearage customers</i>	<i>LID participants</i>	<i>All arrearage customers</i>	<i>LID participants</i>
2022*	52.8%	67.6%	60%	67%
2023	53.4%	69%	54%	67.8%
2024	50.3%	62.3%	42.8%	56%

*Data from January – September 2022 was not included for LID participants as this was prior to the start of LID

NW Natural

Year	(a) From 30-60 days to higher bucket		(b) From 60-90 days to higher buckets	
	<i>All arrearage customers</i>	<i>BDP participants</i>	<i>All arrearage customers</i>	<i>BDP participants</i>
2022*	23.83%	33.46%	13.58%	21.61%
2023	23.74%	38.37%	13.59%	27.61%
2024	21.88%	17.66%	8.16%	9.56%

Cascade Natural Gas

Year	(a) From 30-60 days to higher bucket		(b) From 60-90 days to higher buckets	
	<i>All arrearage customers</i>	<i>EDP participants</i>	<i>All arrearage customers</i>	<i>EDP participants</i>
2022*	20.55%	26.44%	10.01%	18.39%
2023	21.59%	24.84%	11.45%	24.42%
2024	20.96%	16.21%	11.25%	15.44%

*Cascade's EDP was implemented on October 1, 2022.

Existing Oregon IOU Arrearage Management Programs (AMPs)

Avista Utilities

SCHEDULE 493

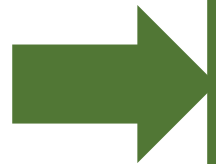
Verde 302/ 25

RESIDENTIAL LOW-INCOME RATE ASSISTANCE PROGRAM (LIRAP) – OREGON

Arrearage Management Program (AMP) – reduces customer arrearages owed over a 12-month period by providing an incentive for on-time, regular payment of their current bill plus a portion of the past due balance, for a maximum award of \$1,000.

Arrearage Forgiveness – provides arrearage forgiveness for customers with incomes at or below 20% SMI, for a maximum award of \$1,000.

Affordability	Zero to 60% SMI Bill Discount			
	Zero to 5% SMI 90% discount	6 to 20% SMI 60% discount	21 to 40% SMI 25% discount	41 to 60% SMI 15% discount
Past Due Balances	Zero to 20% SMI Arrearage Forgiveness		21 to 60% SMI Arrearage Management Program	
Hardship/ Emergency	Customers experiencing hardship or energy emergency Project Share			



Cascade Natural Gas

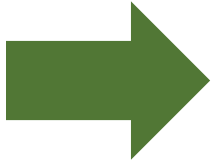
SCHEDULE 32 OREGON LOW-INCOME BILL ASSISTANCE PROGRAM (OLIBA)

LOW-INCOME DEFINITION

A customer is considered low-income if their gross cumulative household income is less than or equal to 150% Federal Poverty Level (FPL) or less than or equal to 60% State Median Income (SMI) for the number of residents living in the household.

GRANTS

Four tiers of grants are offered based on the customer's FPL or SMI, whichever is more advantageous to the customer. A qualifying customer may receive a cashless voucher for the percentage of their past due amount as established in the tier for which they qualify:



Tier	Income Level	Arrearage Paid
T1	0-25% FPL, 0-15% SMI	90%
T2	26-50% FPL, 16-30% SMI	86%
T3	51-100% FPL, 31-45% SMI	83%
T4	101-150% FPL, 46-60% SMI	80%

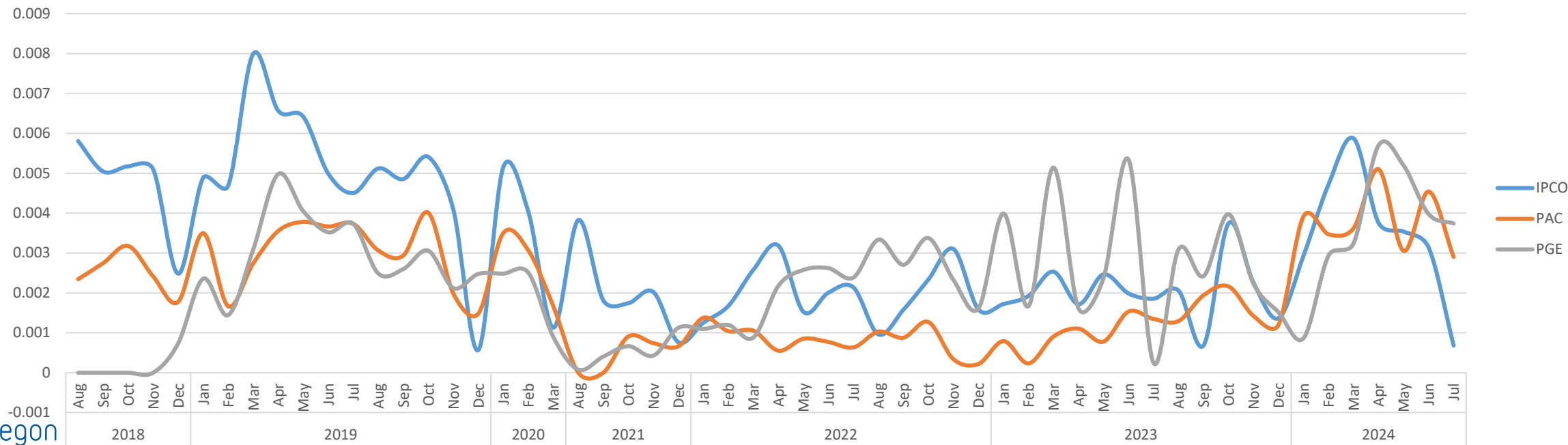
Disconnections

Residential disconnections for non-payment only

<https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=21694>

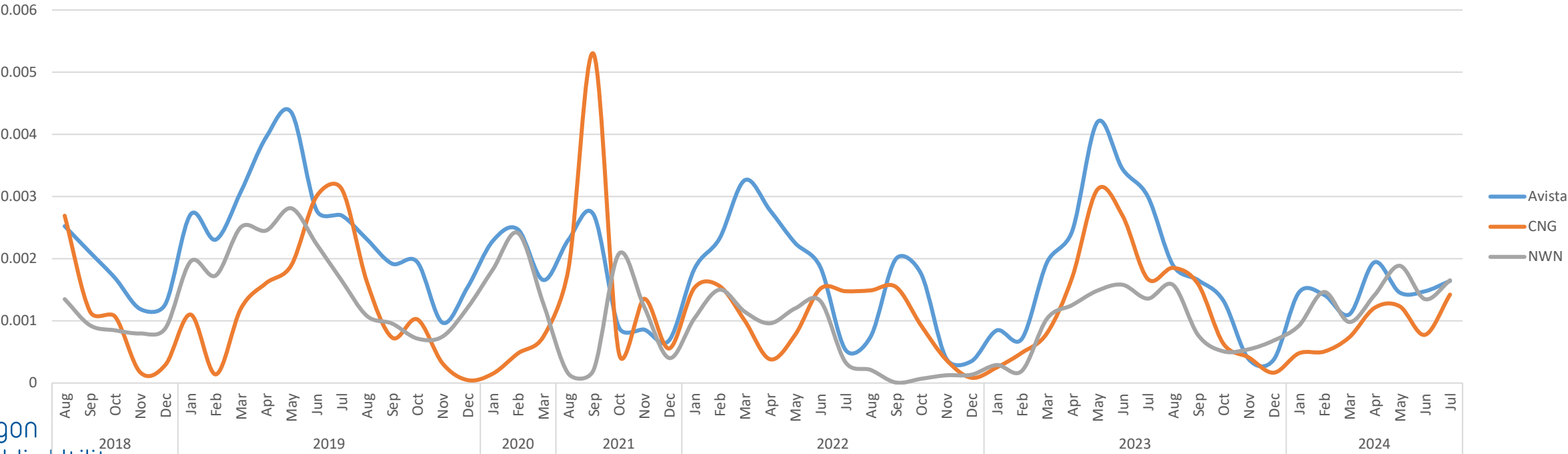
PGE, PacifiCorp, and Idaho Power

Oregon Electric IOU Disconnection RATE



NW Natural, Avista, and Cascade

Oregon Natural Gas IOU Disconnection RATE

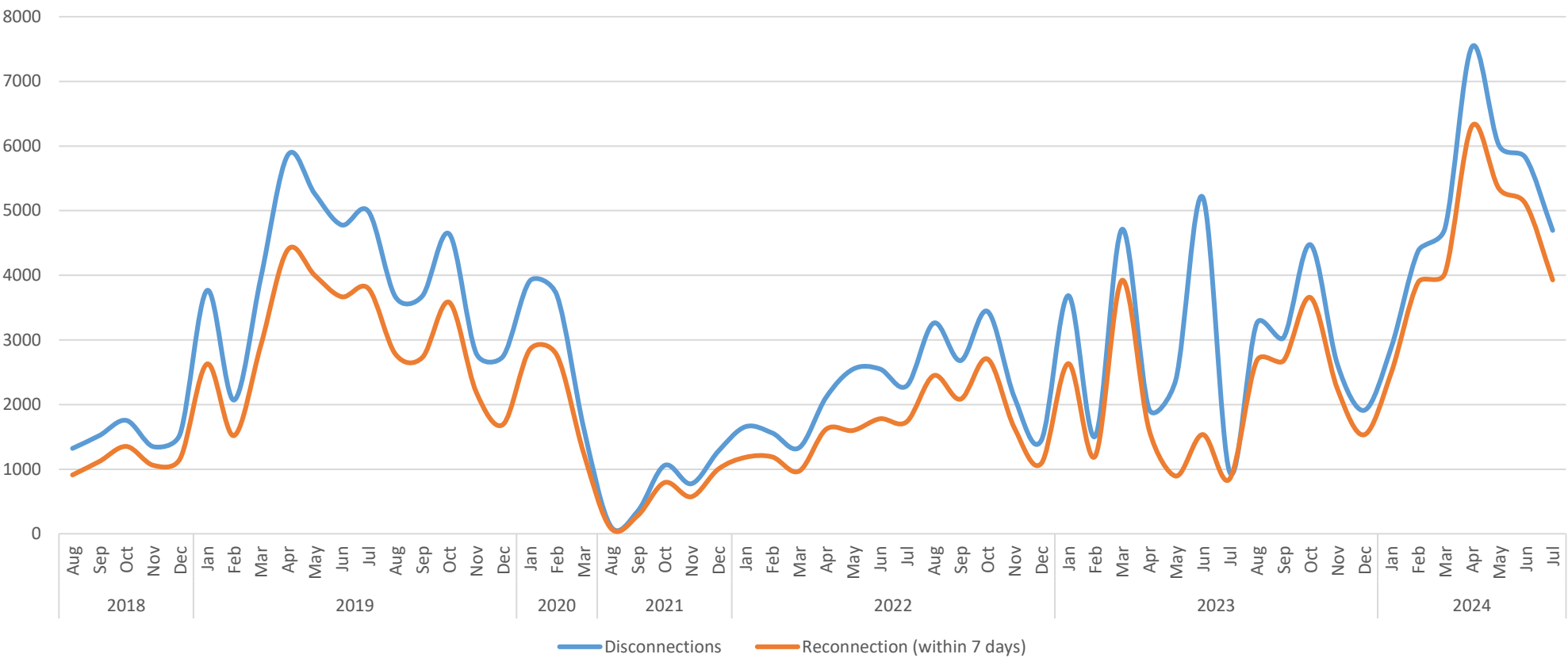


Portland General Electric

Approximately 4,000 disconnected households in 2023 were likely eligible for energy assistance but didn't participate

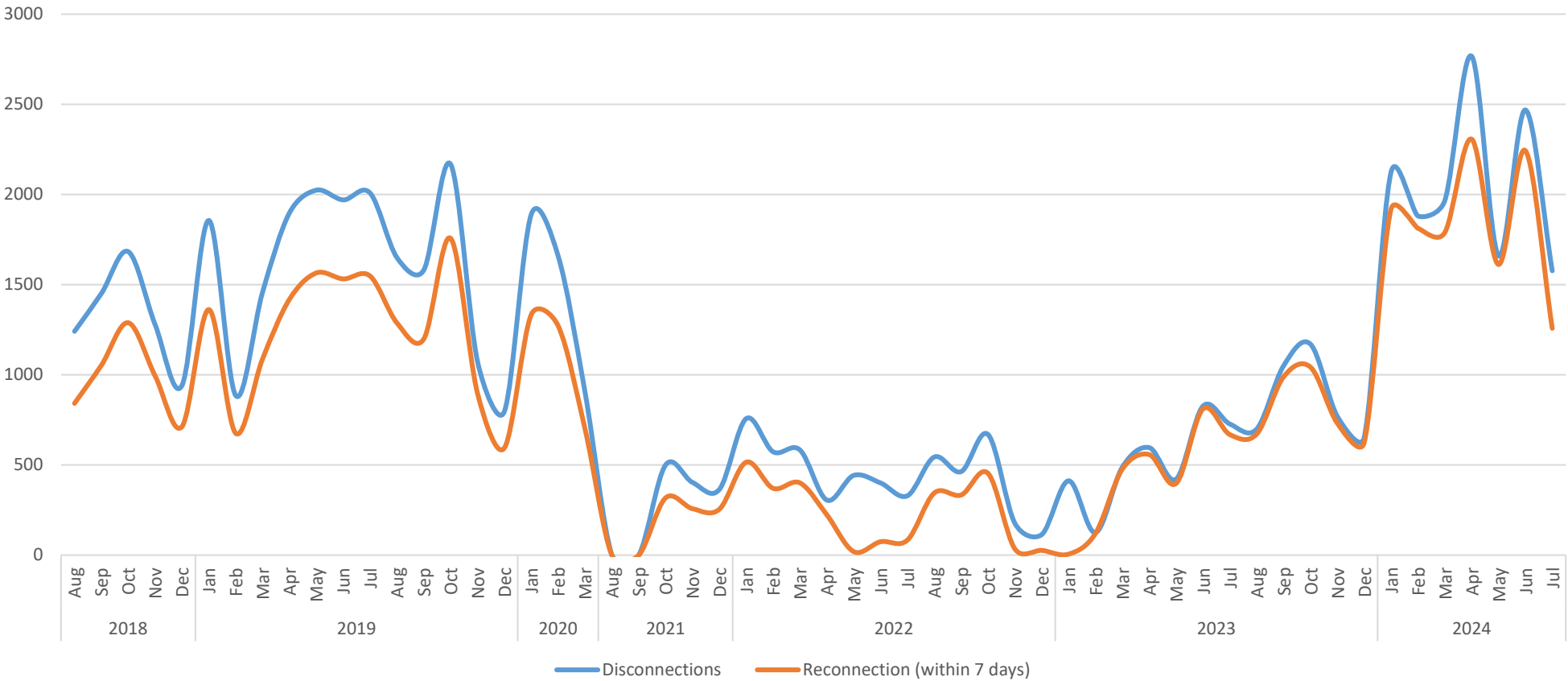
Verde 302/31

PGE Residential Disconnections (RO 12)



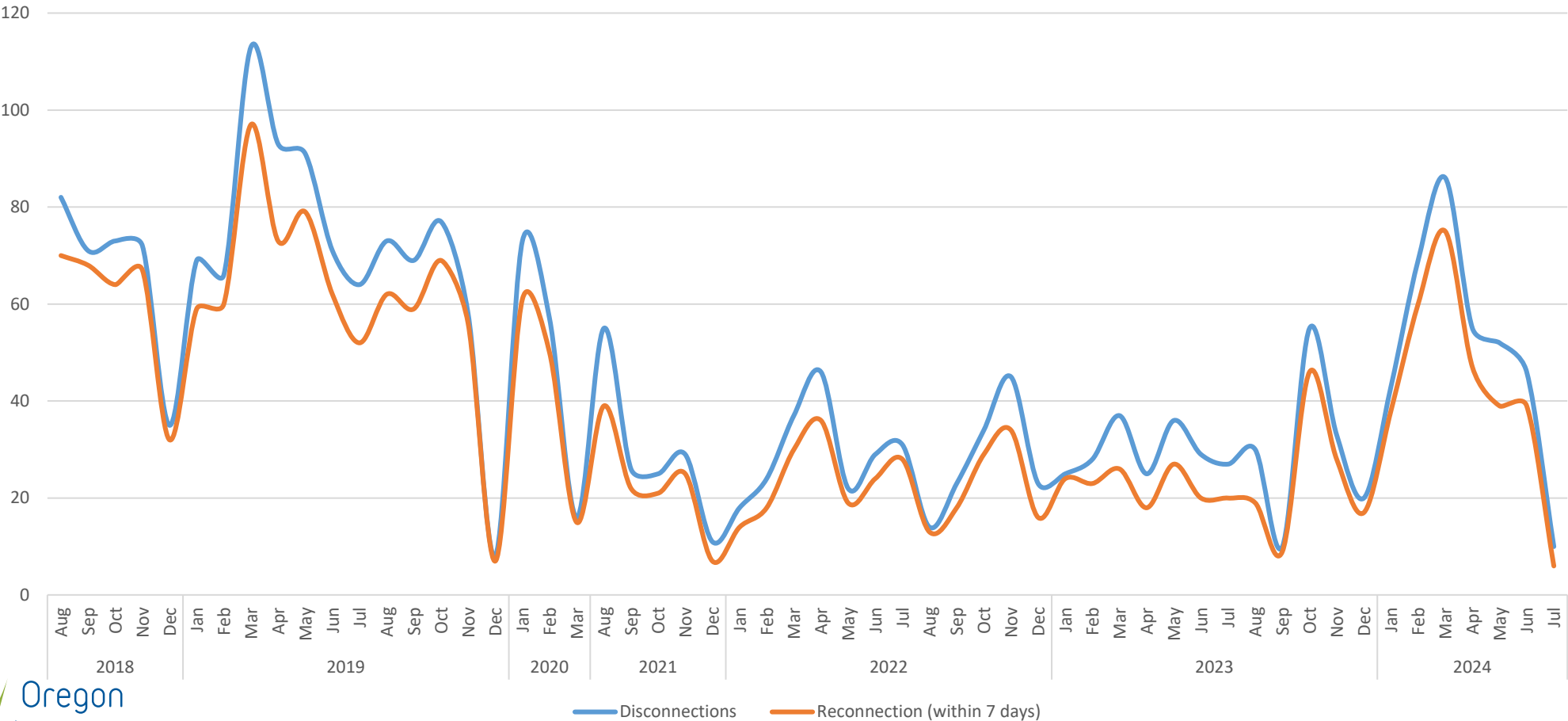
Disconnections	
1/1/2024	714
2/1/2024	2,424
3/1/2024	2,681
4/1/2024	4,712
5/1/2024	4,303
6/1/2024	3,300
7/1/2024	3,108

PacifiCorp Disconnections (RO 12)



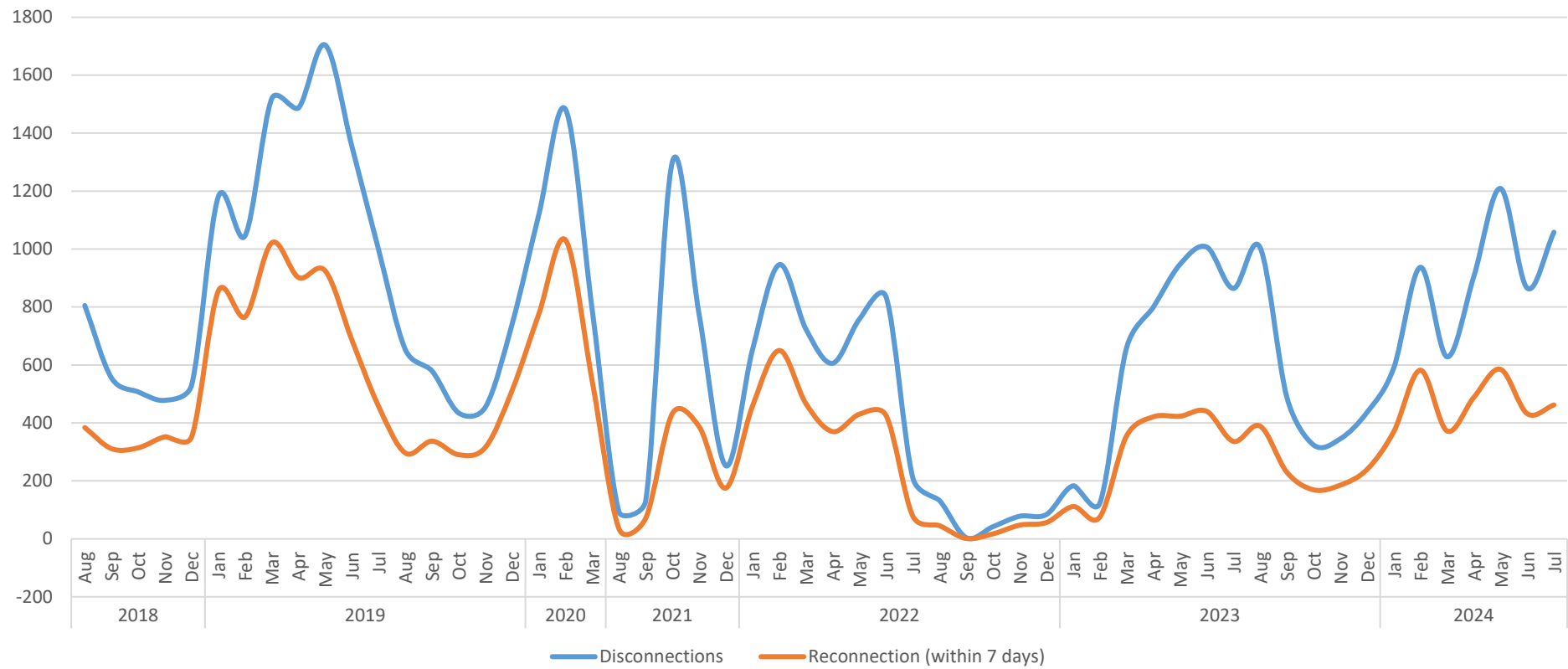
Disconnections	
1/1/2024	2,124
2/1/2024	1,881
3/1/2024	1,966
4/1/2024	2,767
5/1/2024	1,660
6/1/2024	2,469
7/1/2024	1,577

Idaho Power Disconnections (RO 12)



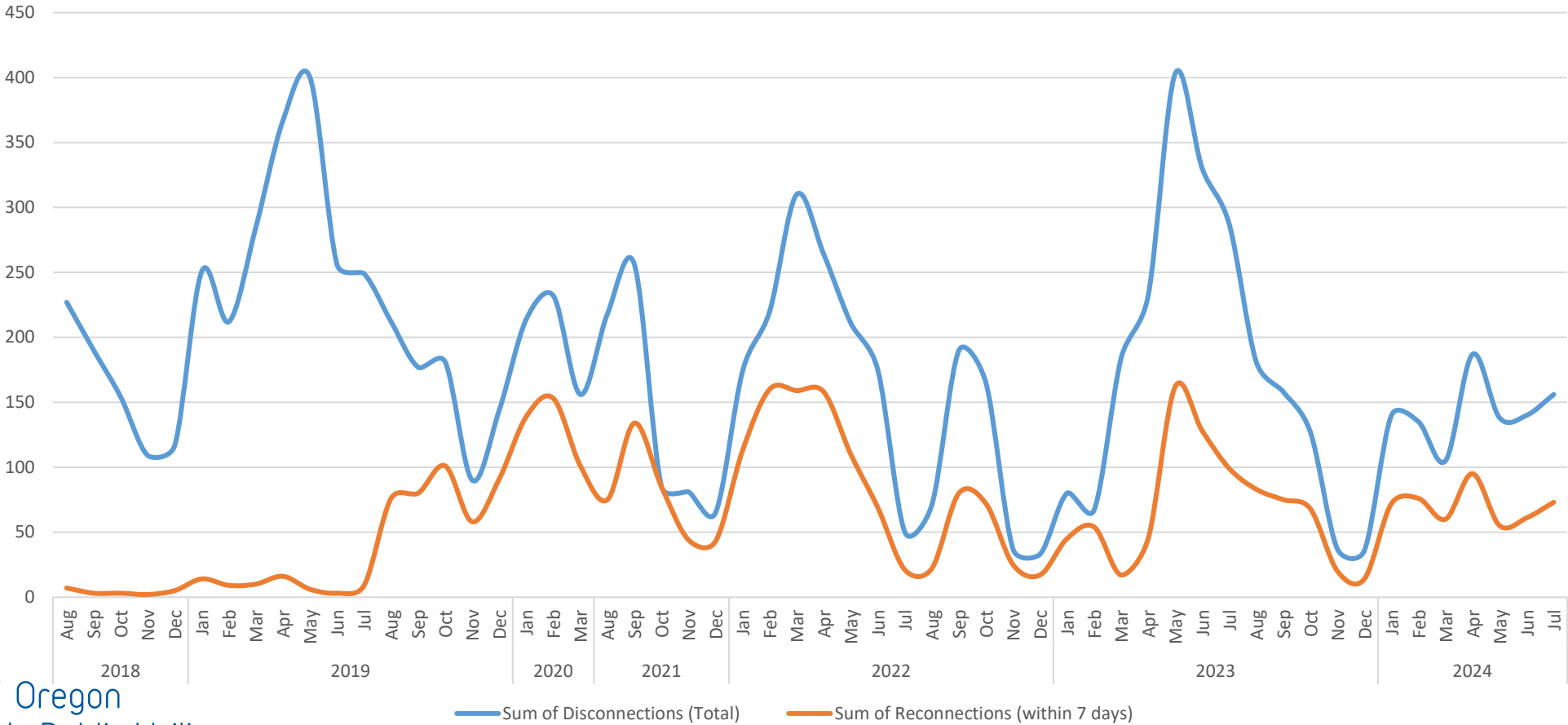
Disconnections	
1/1/2024	43
2/1/2024	69
3/1/2024	86
4/1/2024	55
5/1/2024	52
6/1/2024	46
7/1/2024	10

NW Natural Disconnections (RO 12)



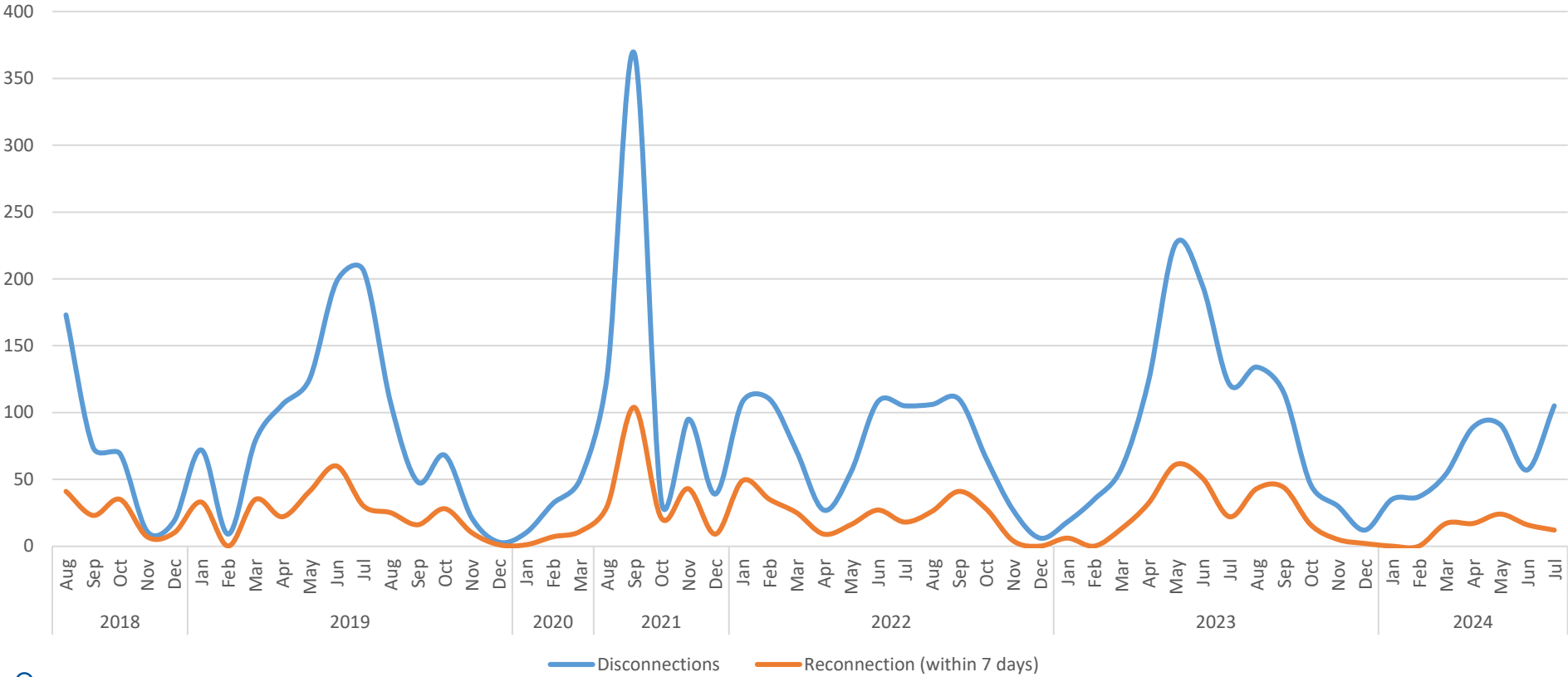
Disconnections	
1/1/2024	589
2/1/2024	937
3/1/2024	628
4/1/2024	905
5/1/2024	1,209
6/1/2024	865
7/1/2024	1,058

Avista Disconnections (RO 12)



Disconnections	
1/1/2024	140
2/1/2024	135
3/1/2024	105
4/1/2024	187
5/1/2024	138
6/1/2024	140
7/1/2024	156

Cascade Natural Gas Disconnections (RO 12)

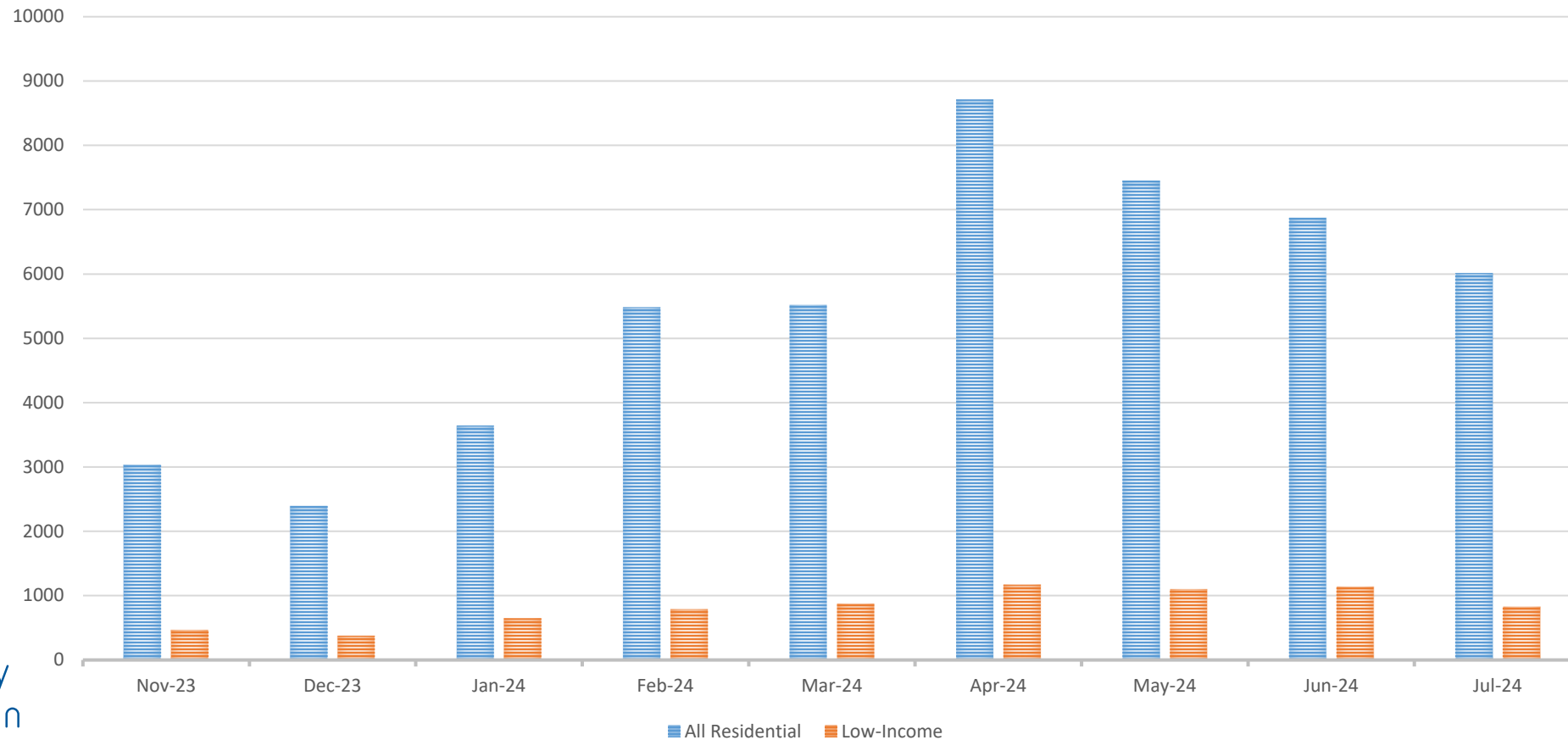


Disconnections	
1/1/2024	35
2/1/2024	37
3/1/2024	54
4/1/2024	89
5/1/2024	91
6/1/2024	57
7/1/2024	105

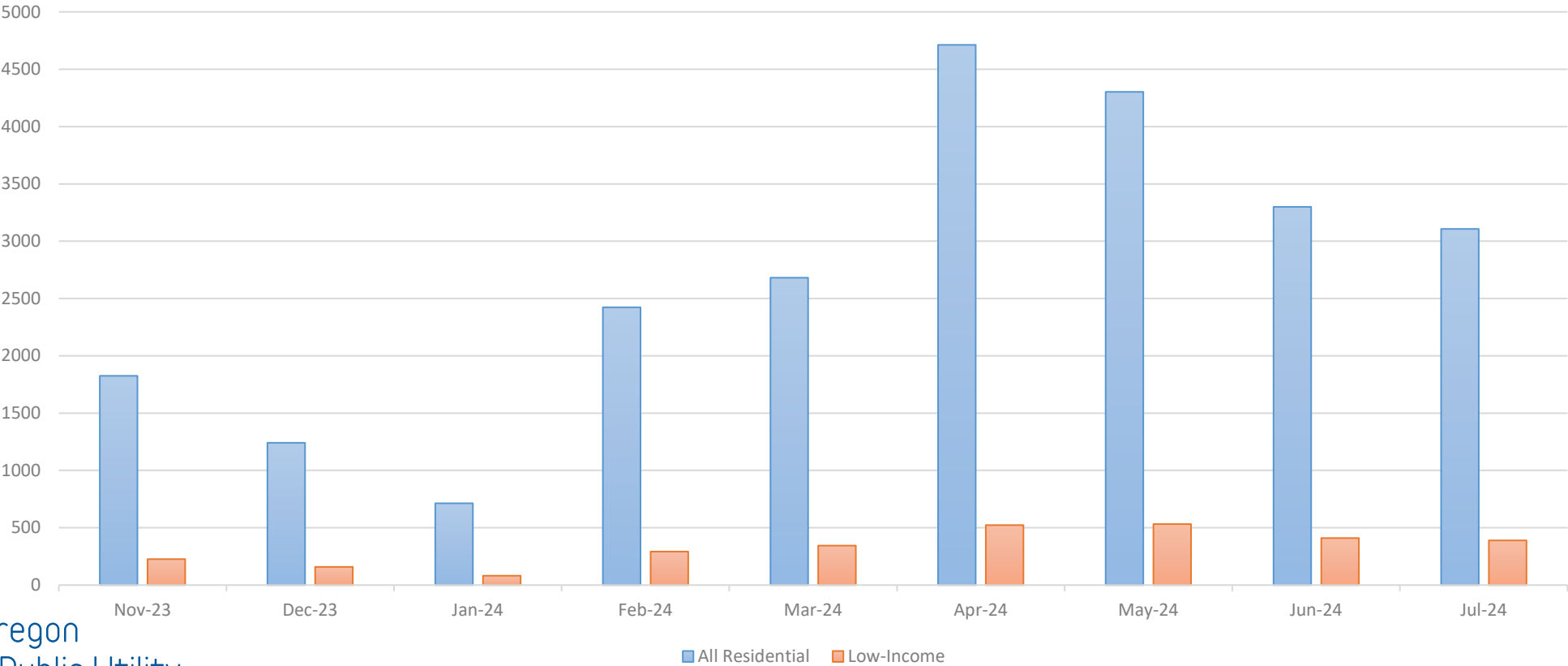
Energy Assistance Account Disconnections

**For individual utility charts, be mindful of the primary Y-axis to account for scale of disconnection counts if comparing between utilities

Segmented Disconnections

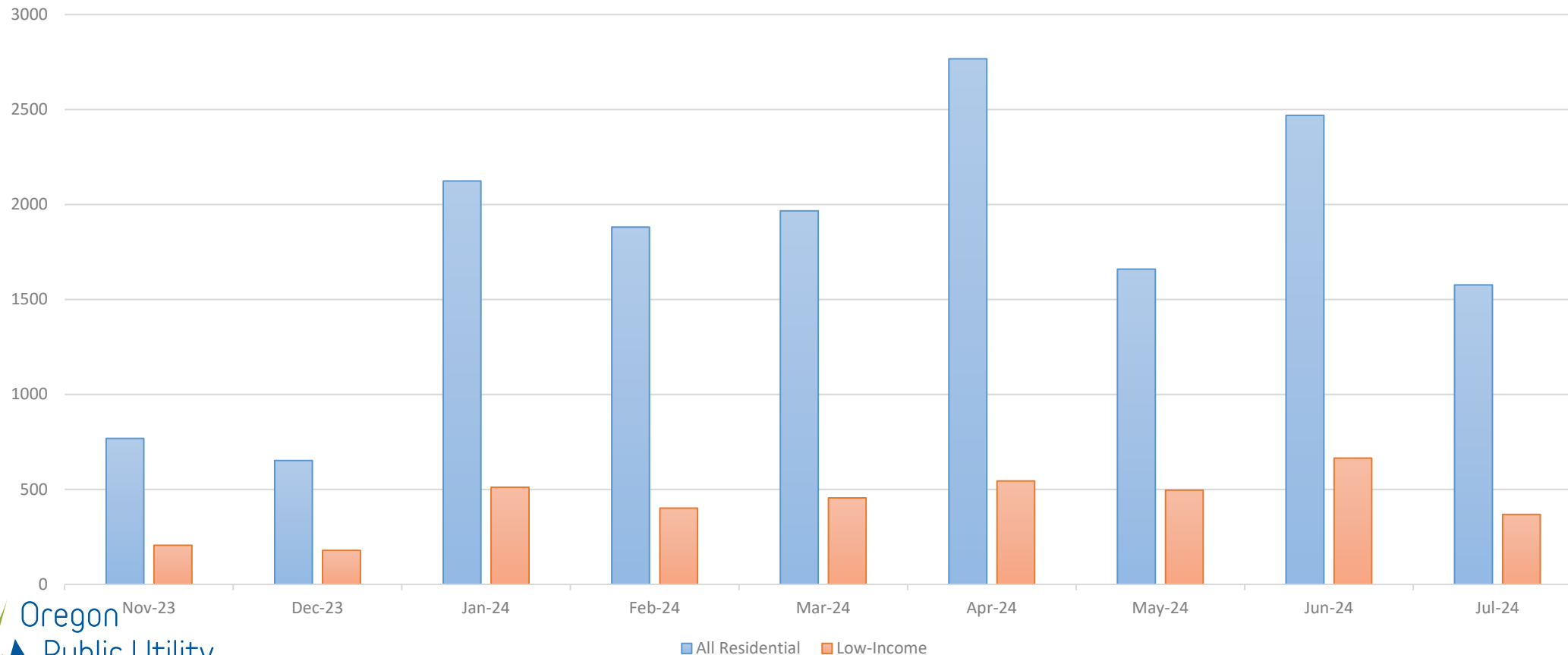


Segmented Disconnections

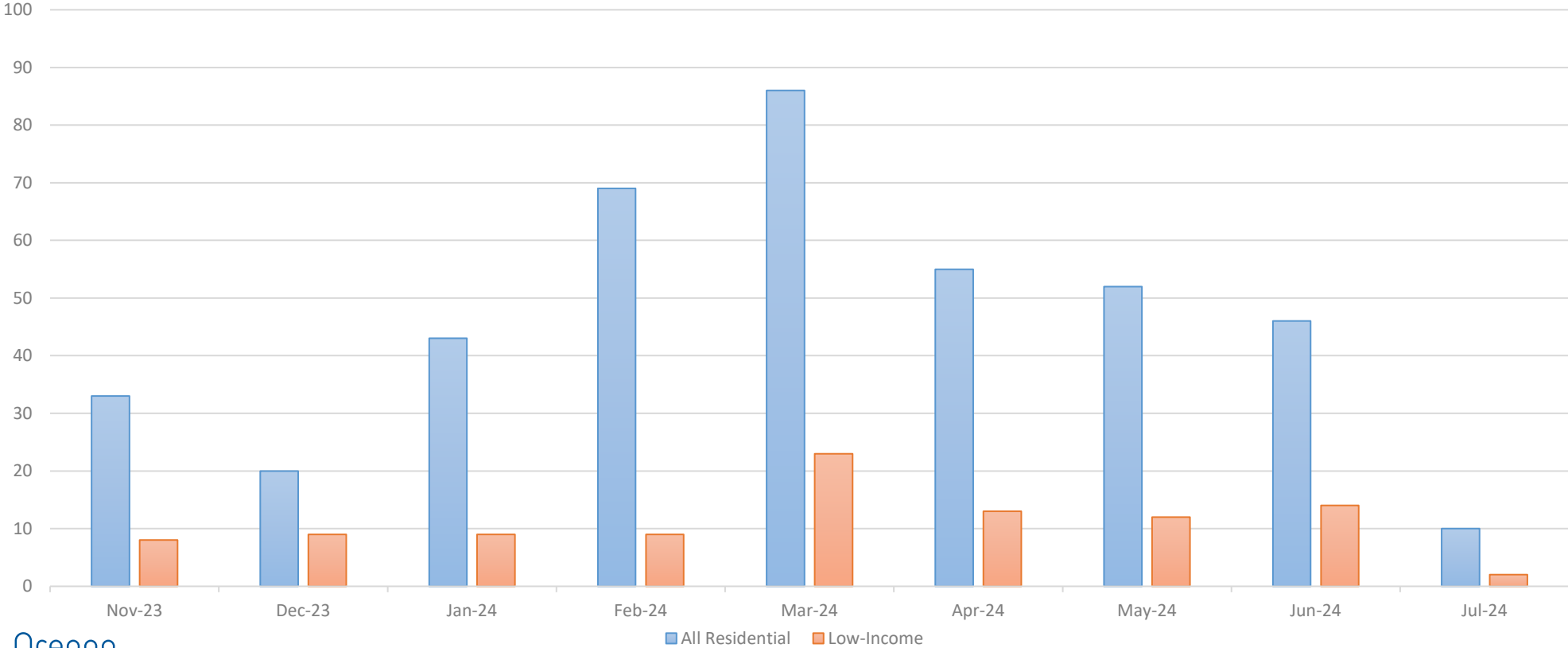


Per PGE’s 2023-2024 Energy Burden Assessment approximately **190,000 (± 10%) residential PGE customers are low-income (earning under 60% State Median Income); including 118,000 that are both low-income and high energy burden*

Segmented Disconnections

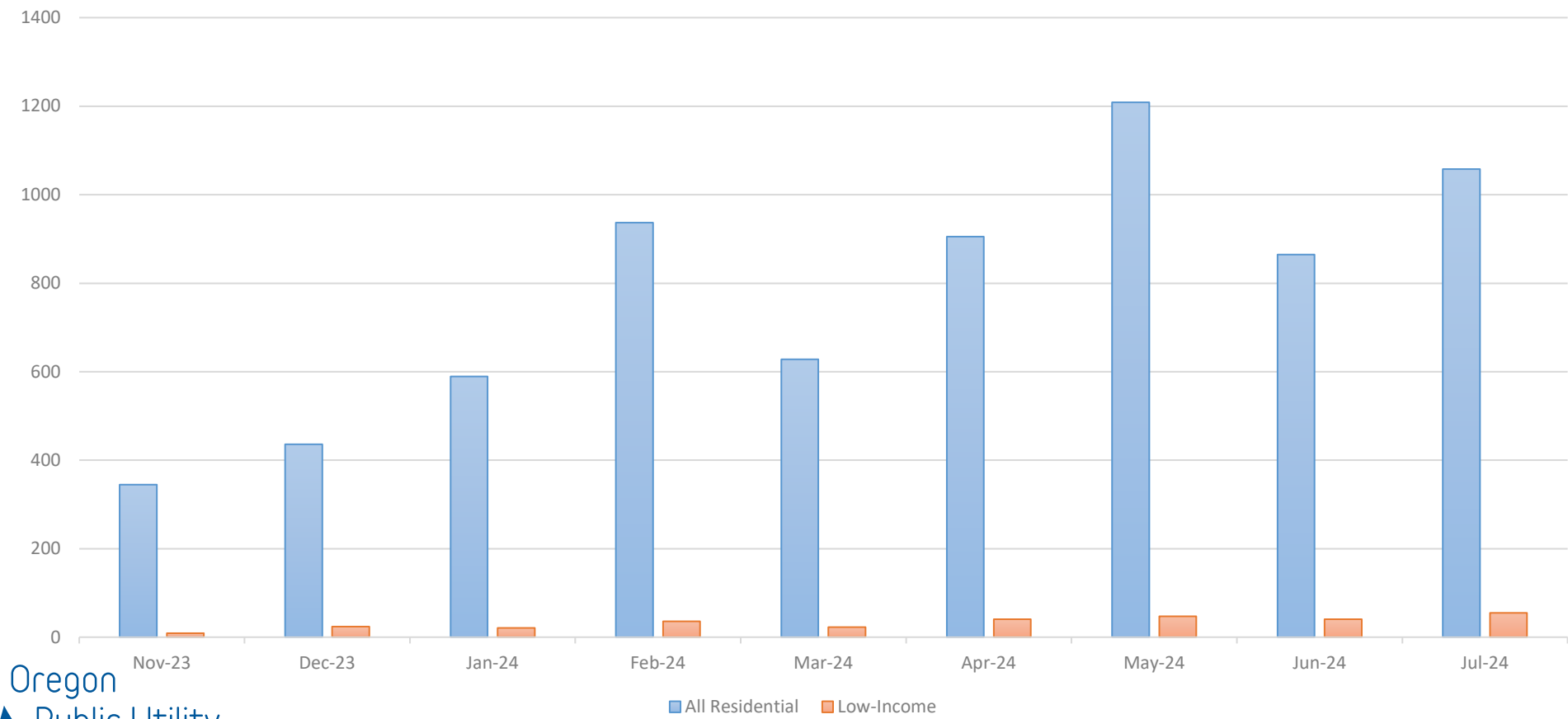


Segmented Disconnections



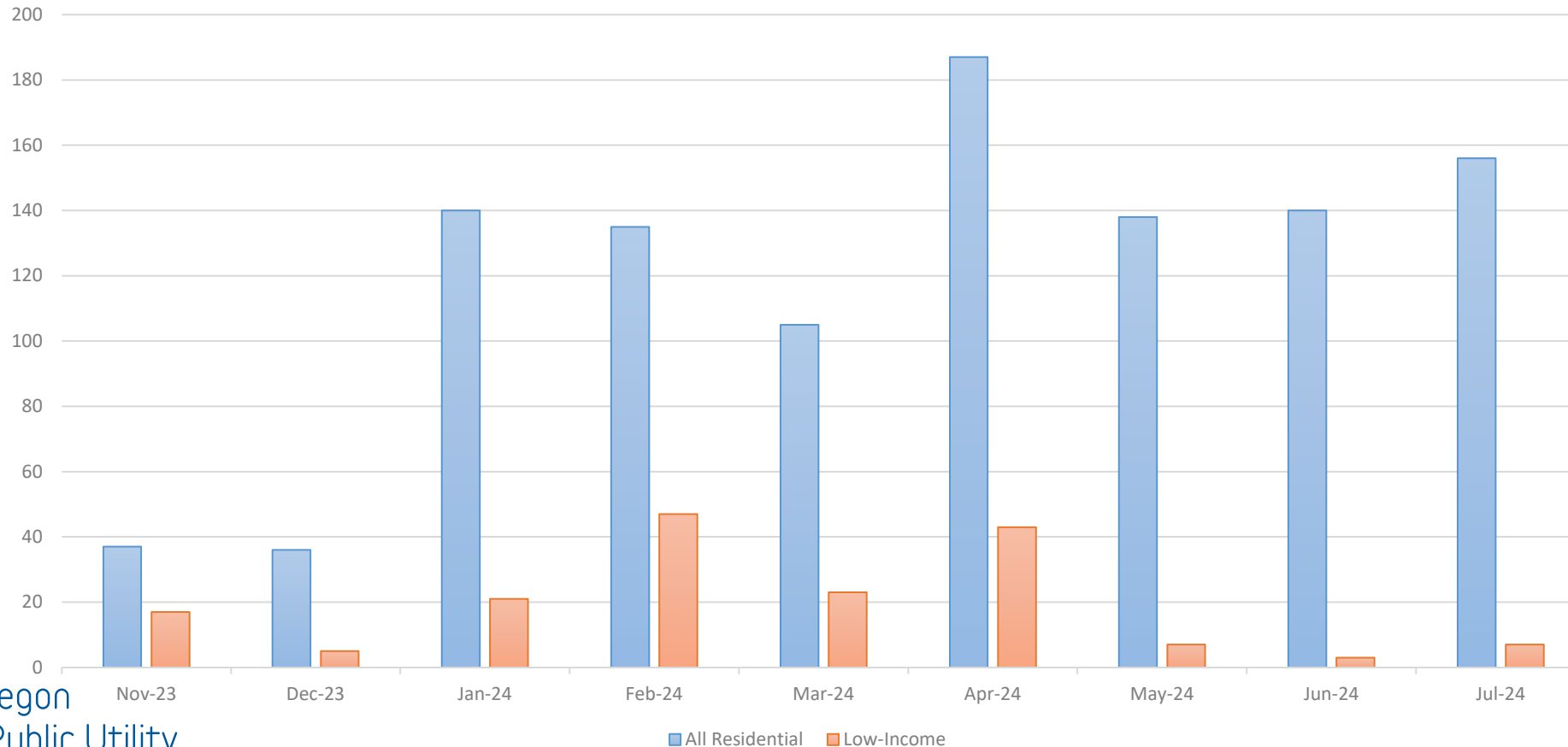
Per Idaho Power’s 2023 Energy Burden Assessment approximately **4,000 (± 10%) residential Idaho Power customers are low-income (earning under 60% State Median Income), including 3,500 that are both low-income and high energy burden*

Segmented Disconnections

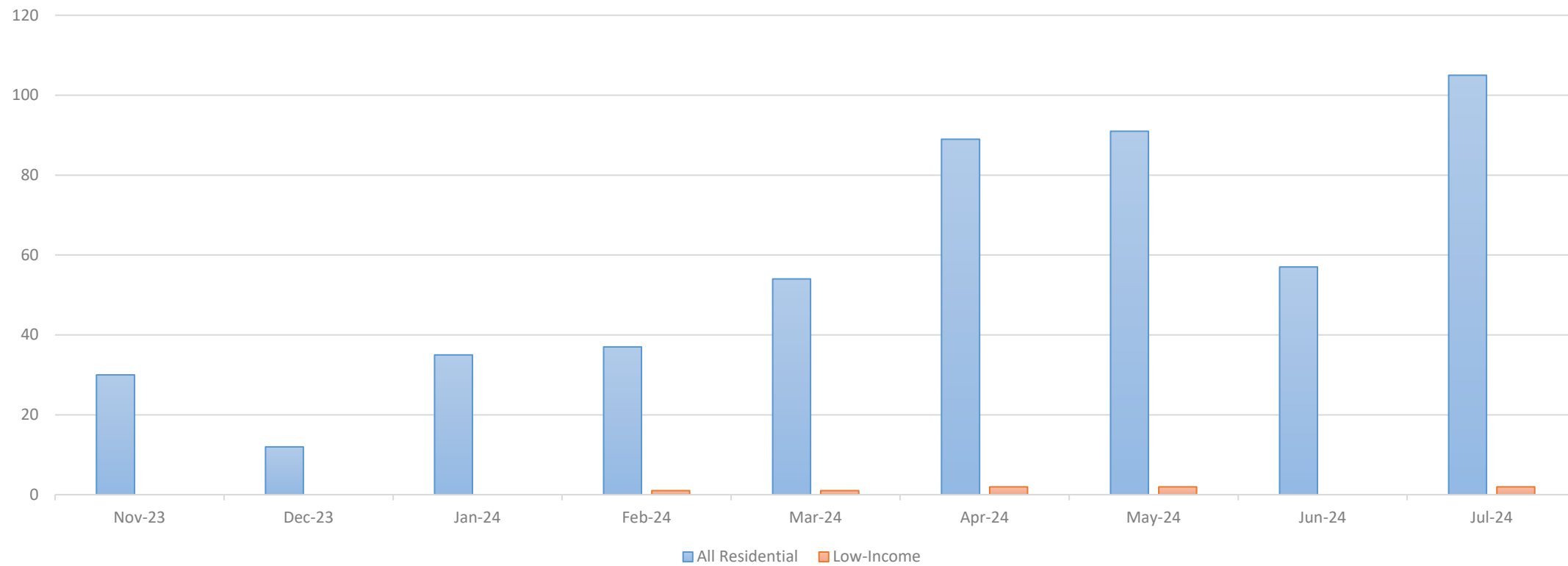


Per NW Natural’s 2024 Energy Burden Assessment approximately **71,000 (± 10%) residential NW Natural customers are low-income (earning under 60% State Median Income); including 50,000 that are both low-income and high energy burden*

Segmented Disconnections



Segmented Disconnections



AR 653

2021 Revisions to Division 21 Rules to Strengthen Customer Protections Concerning Disconnection

_____ of this report

Summary of Rule Changes in AR 653

Verde 302/ 46

Oregon Administrative Rules 860 Division 21

General Residential Customer Protections:

860-021-0305: Disconnection times established to reduce need for after-hour reconnections.

860-021-0405: Notice period extended from 15 to 20 days, with a 24-hour payment arrangement window.

860-021-0406: Wildfire displacement protections added.

860-021-0407: Severe weather protections increased for residential and small commercial customers.

860-021-0410: Self-certification for medical certificates allowed, timeline extended to 30 days.

860-021-0415: Longer payment plans allowed, renegotiation options provided.

Next Steps in the UM 2211 Phase 2 Process

Verde 302/ 47

Upcoming dates to remember





Attachment A

Arrearage and Disconnection Assessment: Utility Disconnection Practices

Staff asked utilities to provide the Company's disconnection policy, including a narrative explanation detailing how a customer would navigate through the process. It is Staffs intent that in evaluating the current arrearage and disconnection data, that we are also presenting the human experience in relation to navigating these practices. Staff presents this information as a place to start conversations around how customers navigate the disconnection experience and to inform future discussions with Staff, utilities, and stakeholders around best practices.

NW Natural (NWN)

NW Natural's disconnection policy is described in Tariff Rule 11 available at this link: [NW Natural OR Tariff Rule 11.](#)

Open/Active Account Collection Process:

The collection process typically involves a series of written reminders and notices that encourage the customer to pay the outstanding amount due before a stated due date. If the customer pays the arrears balance in full at any time within the collection cycle, the collection process will stop when the system reviews the account for the next action. The history of the actions previously taken is retained and the account waits for the next billing cycle to begin. If the customer pays part of the balance, the system evaluates the account at the time of the next collection review date to see if the limits still warrant the next collection event.

Step 1: The monthly Bill is issued on the account. This is considered Day 1 of the Collection Process. That bill is due in 21 days, with a 7-day grace period.

Step 2: If the Monthly Bill is not paid by the due date with the grace-period, a 20-Day Reminder Notice is mailed out on approximately Day 28.

Step 3: If a payment isn't made after the 20-Day Reminder Notice is mailed an Urgent Notice is mailed to the customer approximately 7-10 days later.

Step 4: If a payment isn't made approximately 15 days after the Urgent Notice is mailed out the account is reviewed and receives a call-ahead.

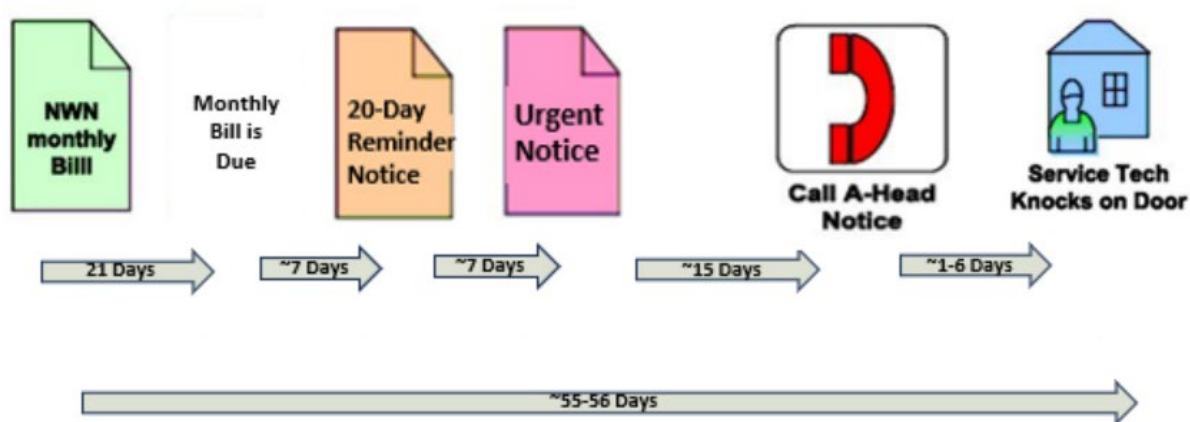
Step 5: If a payment isn't received after the call-ahead is made a technician is dispatched for field collections in approximately 1-6 days.

Please note that weekends and holidays alter the timeline. If the next step in the Collections process falls on a weekend or holiday, we send the notice out or move to the next step the following business day.

Action	Example	Final Day in Process
Monthly Bill Issued	8/01	Day 1

Monthly Bill Due	8/28 (with 7-day grace period)	Day 28
20-Day Reminder Notice Mailed	8/29	Day 29
Urgent Notice Mailed	9/6	Day 37
Call-Ahead	9/23	Day 54
Sent to Field for Collection	9/24	Day 55

Open Collections:



Cascade Natural Gas (Cascade)

Cascade Natural Gas (Cascade or Company) follows the guidelines established in Rule 5 of its Tariff and OAR 860-021-0305, Grounds for Disconnecting Utility Service. A detailed narrative of the collections process follows.

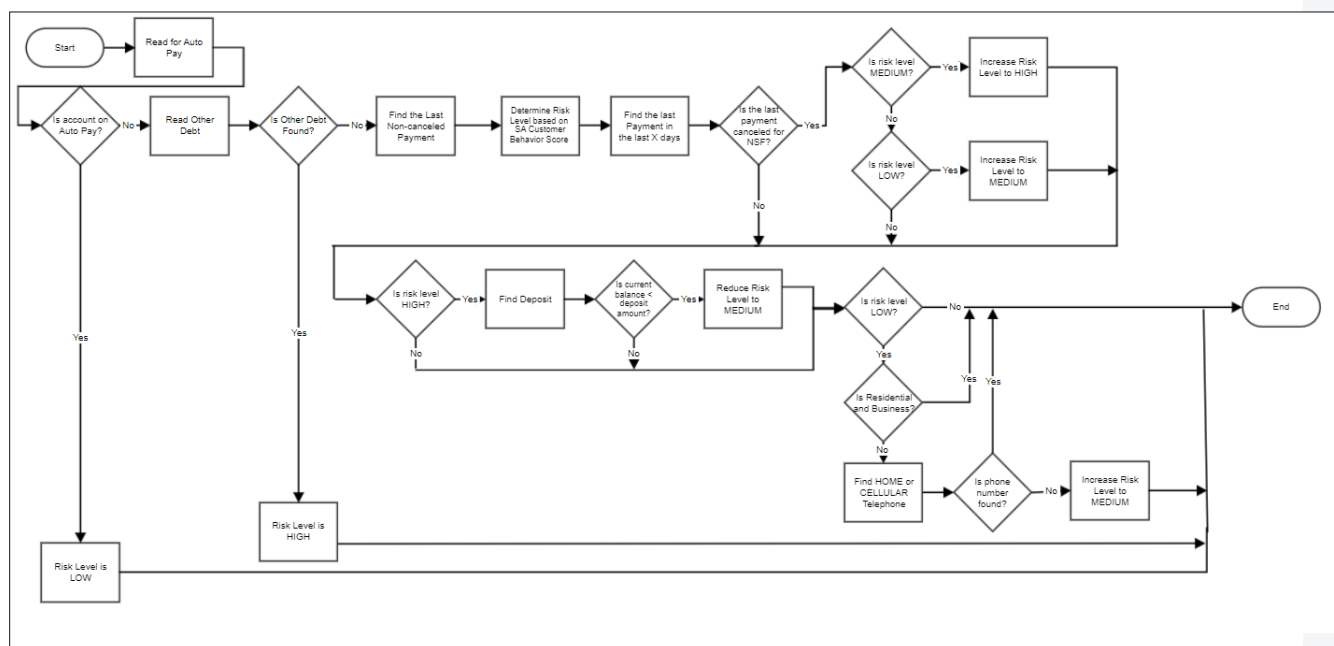
Every account in Cascade's billing system is programmatically monitored to see if an account meets the two criteria for starting a collections process: 1) \$50 dollars or more owed, and 2) debt that is 35 days in arrears. If an account meets these two criteria, then the behind-the-scenes programming within Cascade's billing system performs a risk assessment on the likelihood the customer will make a timely payment of the past due amount.

The risk assessment incrementally considers a number of factors including days past due, days since last payment, last payment amount, number of days in service and then other factors such as previous unpaid debt, Not Sufficient Funds (NSF) history, and no phone number on file.

The risk assessment process determines which of the three-path collections paths the account will follow. The flow chart below shows how an account is assessed and moved through the risk assessment process. This three-path process was created to reduce the number of disconnection notices sent to customers as Cascade realized that while

early intervention is necessary on some accounts to prevent disconnection, this is not always true.

3-Path Flow Diagram



Avista

Avista's collections process begins when a customer's unpaid bill becomes past due, 22 days after the bill issue date. This process includes a notice series, pursuant to OAR 860- 021-0405. Customers receive paper notices, in English or Spanish, and may opt to receive these notices electronically via email or text message depending on their communication preferences. At any time during the collection cycle, customers are able to enroll in Avista's My Energy Discount (MED) program, make a payment, and/or establish payment arrangements (with terms up to 12 months) through their MyAccount on MyAvista.com, through the Company's automated phone system, or by speaking with a Customer Service Representative (CSR). Such arrangements and MED enrollments cancel the active collections process. Avista's CSRs look to meet customers where they are while setting payment arrangements, and while there are ideal guidelines for setting arrangements (i.e., the goal being to get the customer caught up on their past due balance prior to the next bill's due date, to avoid compounding the affordability issue the customer is experiencing), CSRs have the freedom to set arrangements that best suit the individual need of that customer. In addition, Avista's disconnection processes follow all required low-income provisions, as updated through the first phase of UM 2211.

Customers who find themselves in a past due situation are highly encouraged to reach out to their local Community Action Partner (CAP) agency to learn more about the

energy assistance options available to them or to enroll in Avista's MED program. If a customer is seeking an energy assistance appointment, the collections process is placed on hold awaiting the outcome of such appointment.

Portland General Electric (PGE)

PGE's disconnection policy based on Division 21 rules is documented in [Rule H](#) of our tariff. We have provided details via DRs in UE 435 this year, notably CUB DR 64, CUB DR 104, and OPUC DR 641. The following narrative is lifted from those DRs.

PGE takes numerous steps to work with customers in arrearage and only utilizes disconnection as a last resort. When a bill payment is missed, customers receive a bill due reminder and past due text and email alerts to notify customers of an upcoming payment due or balance that is past due. The past due text and email alerts provide links to self-service options that are available 24/7, including payment extensions, Time Payment Arrangements (TPAs) and ways to pay. Payment extensions allow customers additional time to pay the amount due, while TPAs take a customer's balance and divide it out over time for payment. A customer is able to renegotiate the terms of the TPA one time. PGE also provides energy assistance referrals on behalf of customers and enrolls customers in the Income Qualified Bill Discount Program.

A past due balance of \$100 or more will trigger PGE's disconnection process ten calendar days after the most recent bill due date. PGE provides the required 20-day and 5-day notices in advance of a potential disconnection, as well as the past due text and email alerts. All notices include information about payment assistance

When a customer is disconnected, they have two options for reconnection. They can pay the past-due balance in full or pay half the balance. If the customer pays half of the balance, the other half is set-up on a 2-month Reconnection Payment Arrangement. At this point, the customer is no longer past-due, and the customer would not owe anything until their next bill is due. A customer would not be disconnected the month following a reconnection as they no longer carry a past-due balance.

After a reconnection, the customer would receive their next bill for their monthly usage and a Reconnection Payment Arrangement installment. If that balance went unpaid by the due date, the customer would receive a 20-day and a 5-day notice prior to being disconnected. In summary, a customer is not eligible for disconnection until approximately two months following reconnection.

Process/timeline overview for a bill generated 2/7:

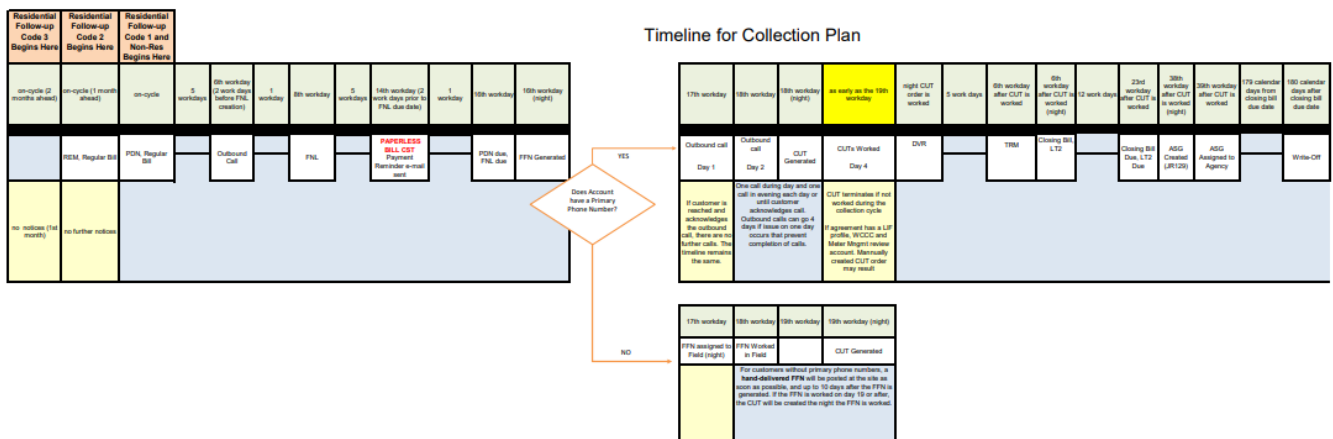
PGE Billing & Collection Timeline



This timeline shows the current Billing & Collection timeline for a PGE customer:

- This customer's February bill generated 2/7 with a due date of 2/26.
- They would have until 3/11 to pay before they would receive a Past due notice (Over 30 days from when they received the bill).
- The customer's March bill generates on 3/8—also notifies the customer they have a past due balance outstanding.
- The customer would receive a Disconnection notice on 3/26 with the due date of 4/1
- The first day of possible disconnect for the past-due February bill is 04/02
- Customers do receive a variety of paper and electronic past due notices as well as text message alerts, based on their preferences.

PacifiCorp (Pacific Power or PAC)



The timeline provides detail on the notification provided to customers prior to disconnection of service. The collection timeline follows all Oregon Administrative Rules (OARs) regarding collection related activity, including but not limited to, noticing, timing, days of disconnection and hours of disconnection.

The Company does not work every past due account that reaches the disconnection of service phase. The Company queues a portion of customers to be remotely disconnected. Those who are queued for disconnection but are unable to be worked remotely are scheduled to be disconnected manually. Customers who contact the Company prior to the scheduled disconnection and make arrangements/payment are removed from the queue.

With regards to how customers may navigate through the process, the Company has 24/7 call center employees available to speak with customers. Each individual customer's situation is different and may require different conversations with the Company's Customer Service Representatives (CSRs). Customers contacting the Company are provided with information to help customers avoid disconnection as well as resources to help in the future. Additionally, the Company's CSRs are trained to listen to the customer to help address all questions they have. Sometimes collection related calls can also include discussion on other topics such as billing, metering, and outages.

See below for a non-exhaustive list of collection related information and topics:

Low Income/Assistance

The Company provides information regarding the Schedule 7 Low-Income Discount (LID) program, low-income customer protections, and attempts to get customers in contact with local assistance agencies that can provide them with financial and other forms of assistance (weatherization, other utility assistance, etc.). CSRs will help customers verify eligibility for LID online, provide assistance filling out the LID form online, and provide information on how to contact their local agency. Further, customers who identify as low-income may have a deposit waived, helping them with their current past due balance.

Payment Arrangements

The Company will offer levelized and equal payment plans to eligible customers. This may include the renegotiation of a payment plan the customer is currently on.

Medical Certification

Customers are advised of the ability to provide verbal confirmation of a medical condition in the home and to follow up with written medical certificate from a qualified medical professional. This provides additional time and payment arrangements for the customer, as well as notifies the Company of a medical condition for notification during emergency shut-offs.

Preference Center

The Company provides customers multiple ways to receive notifications, bills, and alerts. Customers are encouraged to select from options that include outbound calls and callbacks, emails, and texts to provide them a preferred and more successful contact method.

Payment Options

The Company provides customers with information on how they can make payment, including auto-pay, online payment, mobile application, pay by phone, text to pay, postal service, and pay stations.

Idaho Power

Idaho Power's disconnection policy follows the requirements set forth in Oregon's Administrative Rules ("OAR") Chapter 860, Division 21 - Utility Regulation. Below outlines Idaho Power's disconnection process and options available to customers to avoid disconnection due to non-payment, as well as the steps customers can take to reconnect service after a disconnection.

Idaho Power's collection process begins once an account balance persists through the subsequent month's bill due date, the balance is at least 31 days old and is greater than \$75. Idaho Power's collection process will also begin when a payment arrangement exists on an account and such arrangement's monthly installment payment is not paid on time.

Noticing Steps:

Calendar Days After Due Date of 2 nd Past Due Bill	Collection Activity
1	<ul style="list-style-type: none"> Budget Pay Plan is cancelled (if customer is enrolled) 20-day Reminder notice is mailed.
13	<ul style="list-style-type: none"> 1st Interaction Dialer Call – 1st attempt to call the customer to discuss past due balance and options available to avoid interruption of service.
14	<ul style="list-style-type: none"> 5-day Disconnection Notice is mailed. Door hanger/letter is left at the premise if the Company does not have a valid phone number for the customer, or if the premises meets the criteria stated within OAR 860-021-0326.
15	<ul style="list-style-type: none"> Landlord Notification of Termination of Service is sent if there is an active Continuous Service Agreement for the location. This letter gives a property manager the opportunity to have service placed in their name so that service at their property is not interrupted.
19	<ul style="list-style-type: none"> 2nd Interaction Dialer Call – 2nd attempt to call the customer to discuss past due balance and options available to avoid interruption of service.
21	<ul style="list-style-type: none"> Scheduled date of disconnection (excludes Fridays, weekends, state- or utility-recognized holidays, and the day before a state- or utility-recognized holiday).

Customers have several options to avoid disconnection due to non-payment:

1. **Pay Minimum Amount Due:** Ensure the minimum payment amount due is paid before the scheduled disconnection date.
2. **Seek Energy Assistance:** If unable to pay the minimum payment amount due, customers can apply for energy assistance through local agencies, which are

also listed on Idaho Power's website. If a customer qualifies to receive energy assistance from one of the agencies listed on the Idaho Power's website, the customer can contact Idaho Power and notify a Customer Service Representative ("CSR") of the assistance amount received. If the assistance amount received satisfies the minimum amount due, a payment arrangement will be placed on the account in anticipation of Idaho Power's receipt of energy assistance and all current collection activity will cease.

3. **Medical Certificates:** In accordance with OAR-860-021-0410, an emergency medical certificate for residential customers may be an option prior to disconnection for non-payment. Medical certificates are valid for the length of time the endangerment is certified to exist, but no longer than six months without renewal for certificates not specifying chronic illnesses (for which up to 12 months is provided). If a certificate confirming the medical need from a qualified medical professional prescribing medical care is not received by Idaho Power within thirty days, Idaho Power's collection process will start over. Once a confirming medical certificate is received, the customer must establish a payment arrangement within twenty days if an outstanding balance exists on their account.
4. **Winter Protection Program:** Winter protection is available to qualifying residential customers from December 1st through the end of February each year and ensures that power is not disconnected for non-payment during the winter heating months for customers self-declaring that they meet the program's eligibility requirements (whether by proactively reaching out to Idaho Power or when asked by a CSR during the course of a call). Customers are able to enroll in Winter Protection anytime between December and February of each year if they state that they have an inability to pay their account in full and declares that there are children, elderly, or infirm in the home. If a customer is enrolled in Winter Protection, they are eligible to enroll in a payment arrangement following the expiration of Winter Protection for any accumulated arrears so long as a current payment arrangement does not already exist on the account. If a payment arrangement already exists on the account following the expiration of Winter Protection, such payment arrangement's installment amounts must be paid to continue under the terms of the existing arrangement.
5. **Contact Idaho Power:** If energy assistance is not available or the customer does not qualify, they can contact Idaho Power to set up a payment arrangement. Various payment arrangement durations and payment structures are available to best meet a customer's needs. Customers may also enroll in initial payment arrangement options by logging into My Account (Idaho Power's online account management platform) or by calling and navigating through the Company's Interactive Voice Response (IVR) system. If a customer is currently under the terms of a payment arrangement that is past due and they are unable to make the required payment amount, they can contact Idaho Power and speak with a CSR to discuss a one-time renegotiation of their payment arrangement's terms.

When disconnection of service requires Idaho Power to visit the premises, an Idaho Power Field Representative will attempt to personally contact the customer at the residence to offer all eligible payment and arrangement options before proceeding with disconnecting service.

Once a customer has been disconnected for non-payment, Idaho Power requires verification of a payment equal to at least one-half of the past due amount, as required by OAR 860-021-0335. This verification can be a receipt from a pay station, a confirmation number from Paymentus/J.P. Morgan Chase, or No Fee Bill Pay. Any remaining balance will be arranged into a payment plan that is due within the customer's next two billing cycles. If the payment arrangement is not fulfilled and services are disconnected again for the same outstanding balance, the entire past due amount must be paid before service is reconnected.

Disconnection of service is always the last resort, and Idaho Power seeks to provide customers with various forms of notice throughout its collection process to help inform them of all options available to prevent the interruption of service. If a customer's service is ultimately disconnected for non-payment, Idaho Power strives to reconnect service on the same day if verification of payment is received.

Attachment B

Arrearage and Disconnection Assessment: Recommendations from 2024 General Rate Cases & Energy Burden Assessments

Through the utilities recent Energy Burden Assessments (EBAs) and in party testimony from 2024 General Rate Case proceedings, a number of recommendations on addressing arrearage and disconnections have already been offered as suggestions. In order to bring those recommendations and learning into this workstream, Staff has compiled the recommendations that have come out of EBAs as well as a list of recommendations from parties in the four general rate cases in 2024.

Recommendations from Energy Burden Assessments

Utilities have been in the process of completing EBAs to provide insight into their low-income customer segment and the energy burden they face. Empower Dataworks has, or is in the process of, completing three EBAs with Oregon utilities in 2024. Recommendations coming out of those EBAs have included arrearage management considerations.

Staff includes those recommendations as part of this attachment as a way to continue dialogue around possible opportunities available to manage the current status of arrearage and disconnection. Staff has pulled the slides corresponding to arrearage management from [PGE's filed EBA](#), and PacifiCorp's draft EBA that was presented to stakeholders in September.

PGE EBA recommendation on Arrearage Relief:

UE 416, PGE 2024 Rate Review, 2024 Energy Burden Assessment
Page 32

Arrearage Relief

Challenge:

Some customers do not address arrearages until an actual disconnection happens.

Recommendations:

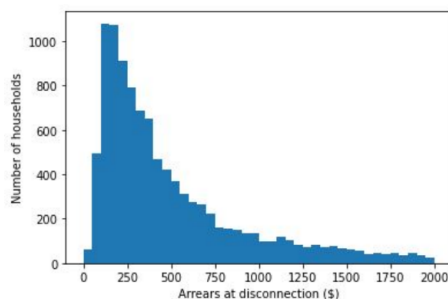
Awareness of programs: Ensure that all late payment and disconnect notifications include information about IQBD, payment plans and payment extensions. Enhance communication about IQBD to customers at risk of disconnection.

Arrearage relief for program participants: Assess the feasibility and benefit vs. cost of a capped budget arrearage relief program. For simplicity, the program could be made available to IQBD participants with arrears and apply the customer's bill discount percent retroactively for arrears up to a limit (e.g. X% discount on first \$1,000 of arrears).

Pilot estimate: \$1M arrearage relief fund can likely serve 3,000-4,000 IQBD arrears customers.

PAC EBA information and recommendations on Arrearage Relief and Arrearage Management:

Arrearages and LID



Approximately 2,500 disconnected households in past year were likely eligible for energy assistance but didn't participate

80% of disconnected households have arrears less than \$1,100

61% of disconnected households are reconnected on the same day or next day

Arrearage Relief

Challenge:

Some customers do not address arrearages until an actual disconnection happens. Customers who are protected from disconnection accumulate very large arrears since there is no incentive to pay down their balances.

Recommendations:

Awareness of programs: Ensure that all late payment and disconnect notifications include information about LID, payment plans and payment extensions. Enhance communication about LID to customers at risk of disconnection.

Arrearage relief for program participants: Assess the feasibility and benefit vs. cost of a capped budget arrearage relief program. For simplicity, the program could be made available to LID participants with arrears and apply the customer's bill discount percent retroactively for arrears up to a limit (e.g. X% discount on first \$1,000 of arrears).

Pilot estimate: \$1M arrearage relief fund can likely serve 5,000-6,000 LID arrears customers.

Arrearage Management

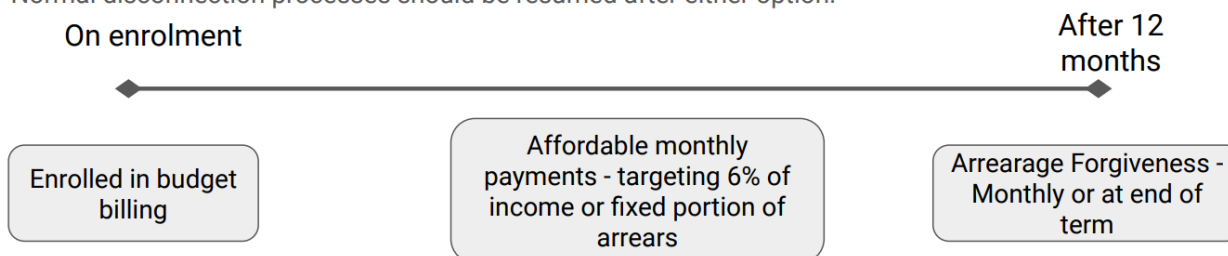
Challenge:

Customers who were protected from disconnection during COVID accumulated very large arrearage balances since there was no incentive to pay down their balances. This issue should be addressed sooner rather than later.

Options:

- Write off debt and socialize costs through a rate increase.
- Offer a **temporary, time-limited** Arrearage Management Program to attempt recovery of some of these arrears. Ongoing AMPs have challenges with complexity and poor success rates for program participants. Arrearage forgiveness is simpler and more effective.

Normal disconnection processes should be resumed after either option.



Party Recommendations from 2024 General Rate Cases

Staff includes recommendations on arrearage and disconnection that have been proposed by parties in the 2024 general rate cases. Staff hopes that these recommendations will provide opportunities for discussion in forthcoming workshops around possible mitigation strategies following data review.

UE 426 – Idaho Power

Community Energy Project

[Community Energy Project's Opening Testimony](#) recommended:

- Idaho Power consider including an arrearage forgiveness and arrearage management program attached to the bill discount program.

OPUC Staff

[Staff's Opening Testimony](#) recommended:

- Idaho Power should enhance and expand their notification practices to inform customers of Division 21 protections and assistance options.
 - When a customer contacts the Company about needing a time-payment arrangement (TPA), IPC representatives should be discussing not only the TPA but asking about income qualifications related to discounts that may also apply and; when a customer is disconnected for non-payment, during

the call for reconnection, discussing with the customer options related to low-income discounts, including no cost reconnection fees.

UG 490 – NW Natural

Oregon Citizens' Utility Board (CUB)

[CUB's Opening Testimony](#) recommended:

- A shut off moratorium be implemented for a 6-month period after the trigger date (November 1 to May 1), allowing customers some time to manage the increase.
- For 12 months after the rate effective date, NWN should be required to report to the Commission, by zip code, the number of customers who have 30-day arrearages, the number that have 60-day arrearages, the number that have received shut off notices, the number that have been shut off, the number that are on payment plans, and the number that are on equal payment plans.

The Coalition (Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club)

The [Coalition's Opening Testimony](#) recommended:

- NWN institute an arrearage forgiveness program for Tier 0 customers on par with its peer utilities.

The [Coalition's Rebuttal Testimony](#):

- reiterates its recommendation of an arrearage forgiveness program stating that arrearage forgiveness will generate savings by reducing the level of arrears and by reducing the age of arrears.

UE 433 – PacifiCorp (Pacific Power or PAC)

The Coalition (Coalition of Communities of Color, Community Energy Project, Verde)

The [Coalition's Opening Testimony](#) recommended:

- PAC include an arrearage program for LID customers between 0-20% SMI.
- Investigate permanently adopting an arrearage forgiveness and/or AMP in connection with all discount tiers of the LID.
- PAC present information and evaluate in the EBA on how an arrearage management/forgiveness program implemented for all tiers of the LID would impact low-income customers high arrears balances and overall energy burden.
- Eliminate disconnections for LID participants in the 0-20% SMI range.

The [Coalition's Rebuttal Testimony](#) recommended:

- PAC implement a program that addresses arrearage management to decrease disconnections.
 - Recommend that in UE 433 the Company agree to implement an AMP that will be further developed under the UM 2211 docket with broader stakeholder input.

- The Company provide a one-time automatically applied arrearage forgiveness up to the total balance of \$1,000, whichever is less, for 0-5 percent SMI LID participants.
 - One-time forgiveness would apply to arrearage balances accrued prior to the effective date of the proposed rate increase.

Oregon Citizens' Utility Board (CUB)

[CUB's Opening Testimony](#) recommended:

- As part of actions to mitigate rate shock, a shutoff moratorium should be implemented for a 6-month period following a rate effective date.
- For 12-months after the rate increase, the Company should be required to report the numbers of customers, by zip code, who have 30-day arrears, 60-day arrears, the number that have received shut off notices, and the number that have been shut off.
- Increase data collection and sharing to provide information that will help develop evidence-based policies and programs to address increasing levels of disconnection.
 - targeting neighborhood level data, customer demographic data, and other data that helps humanize disconnections is necessary.
- Work with stakeholders to create an arrearage forgiveness program.
- Update arrearage reporting and have RE 189, the reporting docket, reinstated immediately, including retroactively reporting for all months not reported in 2024.

[CUB's Rebuttal Testimony](#) recommended:

- PAC postpone its forthcoming 2-year re-enrollment process for its LID.
- CUB reiterated the recommendation from Opening Testimony related to increased data collection and updating arrearage reporting.

OPUC Staff

[OPUC Staff's Opening Testimony](#) recommended:

- PAC should engage Staff, consumer advocates, Community Action Agency partners, and its CBIAG to discuss disconnect rates, past due balances, struggling active and recently disconnected accounts, and any other factors that can be used to inform a crisis mitigation strategy to be brought before the Commission.
- PAC propose an arrearage management component to the LID for LID participants in the 0-5 percent SMI tier.
- Any LID participant with a past-due balance over six times the monthly average bill for the account, the utility halt the accumulation of additional debt and pause any anticipated LID account balance referrals to collection agencies in anticipation of relief.

- As a practice going forward, intervention for any residential customer with past due balances greater than six times the monthly average bill for the account and refer the account for internal arrearage management review.

[OPUC Staff's Rebuttal Testimony](#) recommended:

- PAC create a crisis mitigation program that provides customers between 0-5 percent SMI with arrearage forgiveness up to \$1,000.
- Halt reconnection fees for LID participants until a more permanent arrearage management program has been identified in UM 2211.

UE 435 - Portland General Electric (PGE)

Verde

[Verde's Opening Testimony](#) recommended:

- PGE adopt an arrearage forgiveness program for IQBD enrollees between 0-46 percent SMI.
- Investigate adopting an arrearage forgiveness and/or AMP in connection with all income tiers of the IQBD.
- PGE adopt a July-September moratorium on non-payment disconnections to address financial burden and health impacts of increasing heat waves.

[Verde's Rebuttal Testimony](#) recommends:

- PGE implement a program to be adopted as soon as possible but no later than January 1, 2025, that provides:
 - Uncapped arrearage forgiveness for those in or eligible for the IQBD program since April 2022, in an amount equal to the applicable discount adopted in the revised IQBD program,
 - A cessation of the accumulation of additional debt and of referrals to collection agencies for anyone enrolled in the IQBD program since April 2022 and eligible for enrollment,
 - A widespread effort utilizing CAP agencies/Program Navigators to help identify those eligible for this forgiveness and eligible for other opportunities to reduce the debts,
 - An ongoing Program Navigator project that targets future IQBD customers with arrearage exceeding a six month average bills for outreach and opportunities (offered by PGE or otherwise) to forgive and manage arrearages.
- As crisis mitigation related to the 2024 rate shock, there should be a moratorium on further late-payment disconnections until April 1, 2025, at least for those enrolled in the IQBD program since April 2022.

Oregon Citizens' Utility Board (CUB)

[CUB's Opening Testimony](#) recommended:

- PGE implement an arrearage management and arrearage forgiveness program by January 1, 2025.
 - Forgiveness should be targeted to customers in the lowest IQBD income tiers.
- The Commission should require PGE to decrease shut offs.
- Extend the actual bill due date to 30 days (from the current 20 days with a 10-day buffer) as a way to help customers who struggle to pay bills but are not identified as low-income.
 - This would also result in a push-out of the rest of the existing timeline with the disconnection notice being pushed to 30 days after a customer's bill populates instead of 30.
- PGE begin designing a program with stakeholders that specifically assists customers with incomes between 60-100 percent SMI per EBA recommendation.
- Waive and eliminate late fees for customers who are currently in arrears or who have been in arrears in the prior 5 years.

CUB's Rebuttal Testimony recommends:

- Changing the bill due date from 20 days to 30 days to give customers more time, and thus more pay periods, to pay their bills on time and in full.
- Removing late fees for all PGE customers, at least until a more robust plan and program is put into place to address arrears and disconnections.
- Extending Time Payment Arrangements (TPAs) from 12 months to 24 months for all customers, at least until a more robust plan and program is put in place to address arrears and disconnections.
- PGE commit to implementing an arrearage management and forgiveness program with stakeholders in time with the rate effective date.

OPUC Staff

OPUC Staff's Opening Testimony recommended:

- PGE should engage Staff, consumer advocates, Community Action Agency partners, and its CBIAG to discuss disconnection rates, past due balances, struggling active and recently disconnected accounts, and any other factors that can be used to inform a crisis mitigation strategy to be brought before the Commission.
- PGE come forward with an Arrearage Management Program proposal targeted at the 0-5 percent SMI customer segment.
- In conjunction with the Company's September filing, PGE provide an analysis of residential customer past due balances, information on disconnections pending or carried out for the same household within a single calendar year, and a proposal that aims to reduce monthly disconnection rates for residential customers and prevent the accumulation of past due balances above a certain amount.

- This plan be informed by CAP agency partners, energy advocates, Staff and other interested parties in at least one workshop to occur before going to the Commission.
- PGE halt the accumulation of additional debt and pause any anticipated IQBD account balance referral to collection agencies for any IQBD participant with a past-due balance over six times the monthly average bill for the account in anticipation of relief from the aforementioned proposal.
- As a practice going forward, Staff recommends intervention for any residential customer with past due balances greater than six times the monthly average bill for the account and refer the account for internal arrearage management review.

Attachment C

Arrearage and Disconnection Assessment: AR 653 Summary

Staff has compiled a high-level overview of the [AR 653](#), Revisions to Division 21 Rules to Strengthen Customer Protections Concerning Disconnection process resulting in permanent rule updates and modifications in 2022. This attachment reviews the Staff recommended rule changes as well as a section detailing comments submitted by parties in the two final rounds of commenting.

Recommended Rule Changes

In [Staff's AR 653 memo](#), Staff identified the following recommended rule changes to offer protections to low-income customers.

- 860-021-008 – Added a definition of low-income customers.
- 860-021-0126 – Added a new section that prevents energy utilities from imposing late-payment charges to low-income customers.
- 860-021-0180 – This is a new rule that provides a means for customers to qualify and recertify as a low-income customer, including self-certification.
- 860-021-0200 Subsection (2)(b) removes the need for a low-income customer to pay a deposit.
- 860-021-0205 – Reemphasizes that an energy utility will not require a deposit for a low-income customer.
- 860-021-0215 – Outlines methods to refund a low-income customer if a deposit was previously made.
- 860-021-0328 – Adds a protection for low-income customers to apply as a low-income residential customer instead of paying applicable reconnection charges.
- 860-021-0330 – Allows for fee waivers concerning reconnection charges.
- 860-021-0335 – Adds to Section (1) that protects low-income residential customers concerning reconnections. Section (2) specifically states that a low-income customer will not be required to pay a deposit.
- 860-021-0420 – Waives the first field visit charge to low-income residential customers.

The following were the recommended rule changes offering additional protections to all residential customers.

- 860-021-0305 – Adds a new section on disconnection times that were included in the UM 2114 Stipulated Agreement. This addition should help reduce the need for after hour reconnections.
- 860-021-0405 – Changes the 15-day late notice to a 20-day notice. In theory, this will allow customers an additional five days before disconnection. Staff also revised Section (11) to allow a minimum of 24 hours for a customer to make payment arrangements to prevent disconnection if contacted by a utility representative at the door.

- 860-021-0406 – Adds a new Wildfire Displacement Protection rule.
- 860-021-0407 – Increases residential and small commercial customer protections during severe weather conditions.
- 860-021-0410 – Allows customers to self-certify for medical certificates and extends the certification timeline from 14- to 30-days.
- 860-021-0415 – Adds specific language that allows energy utilities to offer plans of longer than 12- month duration; and allows a residential customer to renegotiate a payment arrangement at least once.

The following were recommended rule changes offering additional protections to small commercial customers.

- 860-021-0406 – Adds a new Wildfire Displacement Protection rule that includes small commercial customers.
- 860-021-0407 – Adds small commercial customers and increases protections during severe weather conditions.
- 860-021-0408 – Adds small commercial customers to the disconnect reporting rule.
- 860-021-0414 – Adds small commercial customers to be eligible for equal payments.

Comment Summary

Staff includes a summary of comments from the AR 653, Strengthening Customer Protections Concerning Disconnection, which resulted in the Division 21 Rule Change process. Staff includes this summary of the final two rounds of comments in AR 653 as a way to memorialize key topics that were identified by parties throughout the proceeding to help inform additional discussions within this arrearage and disconnection evaluation.

The parties within AR 653 included:

- Joint Utilities (Avista, Cascade Natural Gas, Idaho Power, NW Natural, PacifiCorp, and Portland General Electric)
- Joint Advocates (Rogue Climate, Mid-Columbia Community Action Council, Multnomah County Office of Sustainability, Coalition of Communities of Color, Oregon Citizens' Utility Board, Community Energy Project, Climate Solutions, Ethan Kirkham, NW Energy Coalition, Verde, African Alliance for Homeownership, and PCUN)
- Small Business Utility Advocates
- Energy Justice Advocates (Community Action Partnership of Oregon (CAPO), Multnomah County Office of Sustainability, NW Energy Coalition, Verde, Rogue Climate, PCUN, Community Energy Project, Oregon Citizens' Utility Board, Portland Bureau of Planning and Sustainability, and Coalition of Communities of Color)

- OPUC Staff

Third Round Comments

Following Staff's Revised Draft filed on 5/12/22 and the start of the Formal Rulemaking Process.

Joint Utilities (plus updates)

- Collection Process –
 - Notice Communications - Concerned about customer confusion in changing the requirement of a 15-day notice to a 20-day notice. If the utilities are required to add an additional 5-days into the noticing process, some utilities will need to shorten that grace period in order to accommodate this change. This will cause customers who typically pay a few days late, to start receiving past due notices when they hadn't prior. Believe requiring the 15-day notice be changed to a 20-day notice will cause unintended consequences and/or confusion for some customers, without clear benefits and recommend leaving the 15-day notice requirement intact.
 - Disconnection Timeframe - The electric utilities who can perform remote reconnections ask to be excluded from the requirement to perform service disconnections for non-payment between the hours of 8:00 am and 2:00 pm. Utilities with the capability to remotely reconnect are able to facilitate responsive, same-day reconnection of service within reason.
- Severe Weather Protections –
 - Removing the word "high" from the current rule such that a moratorium would be in effect when the temperature forecast is below 32 degrees at any point in the day will make it very difficult for utilities to conduct credit disconnections in much of the Fall, Winter and even Spring. It is not uncommon for many cities in Oregon to have a 15–20-degree difference between the high and low projections and typically the low temperatures occur in the middle of the night when a utility would not be completing disconnections.
 - Recommend removal of the winter storm warning from Staff's proposal as a storm warning can often be brief or a nonevent and ask to keep the rule objective.
 - As Staff stated in their recommendation, these changes would make Oregon have one of the strongest severe weather moratoriums in the nation. The Joint Utilities do not believe this is necessary as Oregon is not known as a state with extreme weather.

Energy Justice Advocates (plus updates)

- Access to Energy Utility Service and the Role of Disconnections.

- Encourage the Commission and participants in this rulemaking to consider a different perspective in this process: the premise should be that all households need access to electricity and other fuel.
- If disconnection was not an option, which we suggest should at the very least be a goal of this Commission, non-payment would be the start of a conversation between utility and customer. Most customers want to pay their bills.
- Participants in this rulemaking may have a limited direct experience of being vulnerable to disconnection due to inability to pay.
 - Encourage a collective acknowledgment of our limitations with regards to our ability to understand the specific circumstances of community members who are in crisis and as a result are at risk of disconnection. If we are employed, earning above the 60% SMI threshold, and able to pay our utility bills, how well positioned are we to assess what is sufficient or unnecessary for a family in crisis?
- OAR 860-021-0009 - Adding a subsection to account for energy assistance payments to disconnected customers – Propose language to address this issue by clarifying that utilities must accept energy assistance on closed accounts, allowing the reopening of an account to be initiated by energy assistance agencies. The application could then be completed, and service resumed through two-way communication between utility and customer.
- OAR 860-021-0021 - Interruption of utility service – Remain 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.
- OAR 860-021-0180 - Verification of low-income residential customer –
 - Utility should have to offer some method for a customer to make themselves known that is not tied to whether someone qualifies for or has sought other programs.
 - Narrowing grounds for 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% state median income (SMI) threshold but meet neither of those conditions.
 - This rule should not add additional burden on the utilities and provides the utility the opportunity to provide low-income energy assistance information to the customer to consider for the future. In addition, there may be customers who cannot receive energy assistance or qualify for low-income discount programs due to restrictions by their landlord.
- Cash At Door – The Commission should require utilities to receive cash at the door or retain the 24-hour language in Staff's proposal.

- If a customer has acquired the resources to pay their bill and keep their utilities on, reason and equity demand that the utility accepts the payment.
- While additional 24 hours could be helpful for a customer, we do not see how the burden on the utility to accept the payment outweighs the benefit of keeping a household's utilities on. A utility that accepts payment at the door avoids having to come to attempt another disconnection if the customer is unable to meet the 24-hour deadline.
- Do not support the Joint Utilities' request to strike the existing rule altogether, and if the choice is between keeping the rule as-is or incorporating Staff proposed 24-hour amendment to the rule, strongly encourage the Commission to adopt the latter.
- Alternative payment options are not equitably accessible –
 - Access to payment centers may require travel that necessitates car or public transportation, effectively leaving those without vehicles or living in areas without dependable, if any, public transportation without an in-person payment opportunity. Seniors who cannot drive or who rely on caretakers to meet their needs, as well as customers with limited mobility, will struggle.
 - Additionally, some pay stations do not accept checks. Customers may live in communities with few, if any banks, making access to cash, money orders, or to check deposit options difficult, especially in a short window. Rural communities, like Lake County, may have only one bank. Indeed, our review of payment options in Pacific Power territory indicates that customers in Lake County would have to drive 82 miles to Dairy or 101 miles to Klamath Falls to make a payment.
 - An equitable system must seek to also consider the needs and circumstances of those experiencing the most burdens and barriers.
- Collecting cash at the door does not pose a significant burden to utilities – While the 24-hour window is a better alternative than immediate disconnection, accepting payment at the door is a sure fix to a very real barrier to utility service. This is an opportunity to prevent utility disconnection for customers who need the most help and who are ready to pay.
- Threshold of Number of Hours at or Below Freezing –
 - Encourage the Commission to center human health, equity, and science when making its decision on this issue, as this issue directly impacts human health and life.
 - Encourage the Commission to also consider this issue, and its potential cost and ramifications, in the context of a holistic set of measures that we (this Commission, the utilities, and stakeholders) are taking to recognize

the vitality of energy utility services and to reduce the risk of disconnection.

- The current severe cold weather approach is not protective of human health. Risks are not solely related to hypothermia and other direct health impacts of cold, but also to the risks that families may go through trying to heat their spaces without safe alternatives to do so.
- The Commission should adopt Staff's proposed OAR 860-021-0407(1) as it is a common, simple, reasonable, and protective approach to severe cold weather moratoria. Thirteen states have protections either when the forecasted low temperature will be below 32 degrees or have winter moratoriums, and an additional eleven states have similarly strong protections for specific populations.
- If the Commission rejects Staff's proposed OAR 860-021-0407(1), recommend that the Commission adopts a moratorium based on the number of hours when the forecasted temperature will be 32 degrees or below.
 - Most homes and people can survive a brief period of cold, but prolonged cold will eventually overcome even the best insulation of extra layers of clothing.
- The Commission should retain Staff's storm warning language in the proposed OAR 860-021-0407(1).
 - The National Weather Service issues Winter Storm Warnings when "one of the following is likely to cause life-threatening conditions: heavy snow, wind, freezing rain/drizzle, sleet." The National Weather Service also issues warnings when "a hazardous winter weather event is occurring, is imminent, or has a very high probability of occurrence (generally greater than 80%)."
- The Commission should adopt moratoriums when severe weather is expected within the next 72 hours.
- Number of Days Required for Notice / Due and Payable Period –
 - The purpose of the draft rule extending the notice period is to grant customers additional time between the initial bill and a disconnection. Extending the time between initial bill and disconnection AND extending the time between disconnection notice and disconnection.
 - Ensuring that additional time requires adding language to OAR 860-021-0405.
 - Need to modify when bills are due and when disconnection can happen. We propose to do that by bringing the rules in line with current practice of the most lenient utilities.

- Achieved by expanding the bill due date to 30 days, combined with the already proposed disconnection-notice extension from 15 to 20 days.
- Demographics –
 - Although the proposed demographic data collection rule was not specifically listed in the Notice of Proposed Rulemaking, it may still be considered and included in the adopted rules. The rule is directly related to preventing disconnections to marginalized communities. Understanding and tracking this data is critical to understanding whether the remedies intended by these rules are achieving that goal. If they are not, the data can be beneficial to adopting more targeted strategies to better serve the most energy-burdened customers.
 - Sends a strong signal that the Commission recognizes demographic information is important to understanding the efficacy of these customer protection efforts.
 - If stakeholders who represent marginalized communities indicate there is a need for this information and the utilities indicate they are not prohibited from collecting it, we do not see harm in including rule language that permits, not requires, utilities to collect this information as it pertains to disconnections.
 - While utilities are not necessarily prohibited from collecting this information and may be collecting similar information elsewhere, say as part of their low-income programs, it is worth noting that utilities have resisted collecting demographic data so low-income and environmental justice stakeholders have had to advocate for utilities to include this data collection in the low-income programs.
- Notification of New Protections –
 - Customers must be informed of these changes and additions to be best protected. For instance, if a customer that has been disconnected due to non-payment is unaware that they can call their utility to be reconnected to power after a wildfire evacuation or during a severe weather event, then it is as if the protection was not in place and the work that has gone into this rulemaking would not have served its purpose.
 - Argue for page or blog post or mailer.
- Expanding Populations Covered by Rules –
 - Income is not the sole predictor of vulnerability to disconnection.
 - HB 2475 recognizes that differential energy burdens go beyond low-income customers to include economic, social equity or environmental justice factors that affect affordability for certain classes of utility customers.

- Energy burden, energy poverty, low income, and financial vulnerability do not necessarily begin at 60% of SMI.
- Mechanisms to identify other vulnerable populations exist or are within reach.
 - Utilities have the knowledge and a process for identifying their customers with medical certificates. These already identified customers whose enhanced vulnerability to the impacts of disconnection is already acknowledged in rules should enjoy the Division 21 protections that could decrease their likelihood of disconnection.
- Abolishing Credit Requirements –
 - Recommend that the PUC does away with a deposit requirement for any residential customer, as two of the six investor-owned utilities in Oregon have already done. Since energy is a basic necessity, all humans should be granted access on equal terms. The current proposal already disallows deposits from low-income customers – the group most likely to have insufficient credit.
- Fee Waiver Cap and After-Hour Disconnection Fees –
 - After Hours Reconnects should also be eligible for low-income fee waivers, especially when they can be completed remotely.
 - Strongly hope that the addition to 0305 establishing a disconnection window will be in the final version of the rules, we see with concern that this change is opposed by the Joint Utilities. As a result, at the very least after-hours reconnections should be included in the fee waiver if the proposed change to 0305 is not adopted.
 - Suggest increasing the cap of reconnection fee waivers as they are especially punishing fees for those experiencing financial insecurity.
- 24-Month TPAs –
 - Support a rule, along the lines of Staff's initial proposal, that guarantees that any customer can choose a payment plan of up to 24 months. The Joint Utilities and Staff argue that longer payment plans cause default – however, no such thing follows from the data. This is a classic case of selection bias. People, who are unable to afford the monthly payment in the 12-month plan, are more likely to choose a 24-months plan. They might still not be able to afford that plan, but default will be delayed somewhat.

PGE (plus update)

- In 2019, PGE filed a request for waiver from OAR 860-021-0405(11) and received approval enabling PGE to cease field collections from Customers for overdue billed amounts prior to disconnecting service. Field employees,

especially those that work solo, who are known to carry money in their vehicles are inherently at risk for being attacked and/or robbed as they travel their daily route. Safety is always a priority for PGE which is why PGE strongly believes that accepting payments in the field should not be a requirement within Division 21.

- PGE is committed to providing Customers convenient, free and easy ways to pay their bills. Residential Customers can pay their bill using their checking account or a credit card through the IVA, web, or mobile app for free and available 24/7. Residential Customers can also pay their bill using Amazon Pay or PayPal through the web and mobile app for free and available 24/7. For Customers seeking to pay using cash, PGE offers fee-free payment through Western Union and CheckFreePay.
 - These are all residential and non-residential transactions via Western Union and CheckFreePay, including debit/credit card, check, etc., and not limited to cash transactions. Some of these customers are cash-based customers who are paying their bill, for free, at the hundreds of locations co-located with common retail destinations like Fred Meyer, Walmart, and WinCo throughout PGE's service territory.
- PGE Customers are notified of different ways to make payments via the monthly bill, the 15-day notice and text message, and the 5-day notice and text message. PGE field employees currently have the discretion to work with Customers who indicate they need additional time to make a payment. However, if the Company is required to delay disconnections regardless of whether a customer specifically requests additional time to make a payment, this will cause a significant increase in the number of truck rolls which will result in increased costs of business and a potential impact to customer rates.
- PGE continues to support Staff's recommendation which allows the utility to determine its own policy on accepting payments at the door and asks for a minor modification to the draft language. This modification will better align expected impacts with the stated goal of providing customers sufficient time to make an in-person payment to avoid disconnection for non-payment.

Final Round Comments

Staff

- Temperature Threshold –
 - Cold weather has a higher impact on the most vulnerable customers, the elderly, children, the infirm, and residents of poorly insulated homes. Drops in the interior temperature may quickly evolve into hazardous conditions. The US Department of Housing and Urban Development recommends a higher thermostat setting of 75 degrees for the elderly in the winter recognizing the higher risk.

- Apparent to Staff that the current threshold of a high of 32 degrees offer minimal protections for customers from freezing weather. Whether 32 degrees is the low or the mid-range temperature for the day, customers will still struggle to maintain a safe living environment when the power is disconnected.
- Cash Payments in Field –
 - Subsection 11 will allow utilities the flexibility to continue to receive cash payments to avoid disconnecting service and balance the needs of unbanked, past due customers. If the utility opts to not receive cash payment in the field, utilities must provide the customer an additional 24 hours to go to a payment station to make a payment.
 - Recognizes the difficulties for unbanked customers or customers with no access to internet services to make fee-free online payments. Allowing an additional 24 hours prior to disconnection strikes a balance between the safety of the utility's field personnel and the ability for unbanked customers to make a last-minute payment to avoid service disconnection.
- Extending Disconnect Notice from 15 to 20-Days –
 - With the goal of responding to customers' request for more time to receive energy assistance or to obtain additional funds to avoid disconnection of service, Staff recognizes the complexity of implementing this change, but also believes that it offers a fundamental protection for customers.
 - Overlapping collection cycles with billing cycles may result in a customer receive a new bill with a new amount after receiving a disconnection notice with a different amount and different due date.

Joint Advocates

- Reiterate recommendation that the Commission amend OAR 860-021-0405(11) to require utilities to accept customer payment "at the door."
 - If a field agent has in-person contact and customers have the means to pay their bill, it makes sense that the customer be allowed to pay then and there to avoid disconnection.
 - The reality is that Oregonians from vulnerable and marginalized communities, including seniors and those with disabilities, may have occasional difficulty paying their bills through traditional means. We are sensitive to the utilities' concerns for field agents carrying cash while in the field. We have similar concerns for vulnerable customers carrying cash to a payment location. Without the option to pay at the door, the burden is on vulnerable Oregonians with limited resources to travel. It also increases the risk to the customer carrying cash who may have to walk or rely on public transportation, whereas an agent could have access to a secure lock box.

- Not just cash, but also card or check.
- Reiterate recommendation that the Commission adopt Staff's proposed OAR 860-021-0407(1), or a threshold based on the number of hours at or below the freezing point.
 - The Commission should adopt Staff's proposal because it is the most protective approach to severe weather moratoria, as well as common, simple, and reasonable.
 - Staff's Proposal does not halt disconnections during all outdoor temperatures that would place a home at risk of crossing that threshold. Instead, it would ensure that community members have the energy utility service needed to heat their home on days when the weather is at or below the freezing point.
 - If the Commission does not adopt Staff's proposal, we recommend that the Commission adopt a moratorium on days when the temperature is forecasted to be at 32 degrees or below for four or more hours over the next 24 hours.
 - Establishing whether a day warrants a moratorium under our alternative proposal should not be cumbersome.
 - Alternative proposal would establish a moratorium when the forecasted temperature is at freezing or below for four or more hours during the following 24 hours. This would address concerns of halting disconnections on days when the temperature would briefly dip below 32 degrees Fahrenheit.
 - Utilities would be easily able to determine if they would need to put a moratorium into effect in particular day. OAR 860-021-0407(4) requires utilities to "base the need for a moratorium on data available from the National Weather Service or another weather reporting service that may be designated by the utility."
 - To be meaningful, adopting our alternative proposal would have the utilities look at the forecast for the next 24 hours.
 - Under our alternative proposal, rather than looking at the forecast to answer "is the minimum temperature forecasted to be at or below 32 degrees?" the utility would look at it to answer, "is the forecasted temperature be at or below 32 degrees for four or more hours over the next 24 hours?"
 - Given the difference in the question the utility is addressing, we suggest that this proposal would also require changing

the approach in the rule from looking at the current day to looking at the next 24 hours.

- Other proposals under consideration are not as protective of human health as Staff's proposal or our alternative proposal.
 - Reiterate concern that the status quo, the utilities proposal, and a "maximum forecasted temperature" approach more generally would miss too many days when the temperature is at or below freezing.

Joint Utilities

- Joint Utilities each affirm that adoption of Staff's proposed language to OAR 860-021-045 to extend the disconnection notification window from 15 days to 20 days will add 5 days to the notification period, thus increasing the window between a customer's bill due date and a potential disconnection date.
- Using the data as a basis, the Joint Utilities also provide a recommendation that both increases customer protections during cold weather events and reserves the option-of-last-resort, disconnection for nonpayment, during more temperate conditions.
- While recognizing that there will and should be more days that trigger a severe winter weather moratorium in colder areas of the state, believe that the proposed change swings too far and does not accommodate the wide range between nighttime low temperatures and daytime high temperatures during many months of the year.
- Recommend that the Commission adopt a more nuanced adjustment to OAR 860-021-0407(1) than that proposed by Staff and the Joint Advocates.
 - First, propose restricting a severe winter weather moratorium to the winter months of November through March, as this is the intended period where cold weather protections are warranted, and it is less likely that daytime temperatures will fluctuate as greatly as they do in the shoulder seasons (September-October and April-May).
 - Second, the Joint Utilities recommend increasing the forecasted high temperature threshold that triggers a moratorium. While the JU did discuss and analyze a dual-trigger option that depended on a forecasted low threshold and a forecasted high threshold, concluded that a simple high temperature threshold is much easier to implement and can achieve similar customer protections.

SBUA

- The inclusion of the word, "small commercial" in some of the provisions of these revisions demonstrates to SBUA, the Commission's intention to assure that small business customers are being treated fairly in utility regulations with inclusive

language as well as their analysis on the impacts small businesses face regarding extreme weather and natural disasters.

- SBUA suggests that the Commission consider examples of other best practices to approaching the determining the cost of compliance on small business that is required under ORS 183.336. As Oregon evolves in implementing mandates to remove carbon from its fuel supply it is important to assess the impact on the second largest customer group of the utilities providing Oregon businesses the energy needed to light their businesses, create and sell their product.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 001
Dated October 2, 2024

Request:

Please provide all documents related to and/or memorializing stakeholder engagement informing the Company's Advice Number 24-19. We are particularly interested in feedback received from stakeholders but also seek confirmation that the materials presented to stakeholders in June and August, linked here (<https://portlandgeneral.com/about/who-we-are/community/community-benefits-and-impacts-advisory-group>), were Company produced or were caused to be produced by the Company.

Response:

Stakeholder engagement informing Advice Number 24-19 is summarized in PGE's "Update to EBA Recommendations," filed to UM 2211 on October 4, 2024. Also see Energy Justice Advocates comments filed to UM 2211 on September 12, 2024.

PGE confirms that the CBIAG presentations titled "June 2024" and "August 2024," which are posted on PGE's website, were developed by PGE in consultation with our third-party facilitator, Espousal Strategies. Materials titled "June 2024 Empower Dataworks EBA Recommendations" were developed by PGE's third-party EBA contractor, Empower Dataworks.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 002
Dated October 2, 2024

Request:

The Company agrees with the findings presented in the Energy Burden Assessment (EBA) and presentation materials summarizing those findings, correct? If not, please identify which findings the Company disputes and why. Also, please provide any documents substantiating or supporting the Company's conclusion or decision disputing the finding.

Response:

PGE continues to review EBA data and outputs, but at this point does not disagree or dispute any of the quantitative findings resulting from the EBA or the "main takeaways" summarized on page 65 of the EBA filing. PGE is making best efforts to consider the EBA's recommendations and prioritize next steps, as discussed in PGE's "Update to EBA Recommendations," filed to UM 2211 on October 4, 2024.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 003
Dated October 2, 2024

Request:

Is it correct that the 2024 projected assistance need for the 118,000 high-burden households is \$133 million and the current program only meets 51% of that need? The IQBD program is currently designed to benefit those 118,000 households if sufficiently funded, correct?

Response:

According to the EBA analysis, the 2024 project assistance need for the 118,000 high-burden low-income households is \$133 million. Per the EBA, the forecast 2024 IQBD funding, combined with LIHEAP, OEAP and third party funding, is estimated to meet 51% of that need.

Funding sufficiency is not an IQBD scaling constraint; the program can be scaled to meet the entire eligible customer population with incomes less than or equal to 60% SMI. The EBA estimates this population as 190,000 (plus or minus 10%) PGE customers, which includes the 118,000 identified above and approximately 72,000 low-income customers who don't exceed the energy burden threshold but are nonetheless eligible for IQBD based on household income. See pages 16-18 of the EBA for further detail on these findings.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 004
Dated October 2, 2024

Request:

In the Company's explanation of Advice 24-19, it states that it "analyzed the assessment's recommendations and is proposing an expansion of its IQBD program accordingly." Please explain this statement. What does the Company consider to be an expansion of the program? What does the Company mean by "accordingly?" The Company does not intend to suggest that it has addressed all of the assessment's recommendations with its revision in Advice 24-19, correct?

Response:

PGE's new discount program proposal put forward in Advice 24-19 was informed by PGE's assessment of EBA recommendations. Advice 24-19's cover letter also stated "As PGE will lay out in a forthcoming update to be filed in Docket UM 2211, we are pursuing a suite of concrete actions beyond these tariff changes to improve IQBD and other program offerings in direct response to EBA recommendations." This broader update has now been filed as PGE's "Update to EBA Recommendations," filed to UM 2211 on October 4, 2024. PGE did not intend to suggest that the Advice 24-19 filing addressed all EBA recommendations.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 005
Dated October 2, 2024

Request:

It is correct that Advice 24-19 is revised only to: 1) include some master-metered buildings which consist of individual residential units; and 2) exclude those whose income eligibility is verified for LIHEAP/OEAP from the pool of 3% of enrolled customers who will/may be subject to post-enrollment verification? If this is incorrect, why is it incorrect? Excluding customers whose income eligibility is verified by others from post-enrollment verification is not an “expansion” of the IQBD program, correct?

Response:

Advice 24-19 made changes to implement a new master-meter discount program and reform the post-enrollment verification (PEV) approach. The above statements regarding PEV do not accurately summarize Advice 24-19. Customers whose income eligibility is verified for LIHEAP/OEAP have been exempt from selection for the 3% PEV process since IQBD’s inception. Advice 24-19 proposes a change to the PEV approach that adopts an EBA Recommendation to “implement a targeted PEV protocol” which is not by itself an “expansion” of IQBD.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 006
Dated October 2, 2024

Request:

It is correct that the estimated 3,000 people who may benefit from the master-metered application are likely included in the 118,000 energy burdened PGE customers? If not, why not? Is so, why does the Company deem providing a benefit to those 3,000 people an “expansion” of the IQBD program? In fact, this is not an expansion, it is just a procedural response to a problem of providing the benefit to those eligible customers living in “affordable housing,” correct?

Response:

The more than 3,000 households (reflecting a significantly higher, but unknown, number of people) who could potentially benefit from the master-metered program are not currently eligible for IQBD, even though they have household incomes that would otherwise make them eligible. Hence, making them eligible expands IQBD’s total expected size.

The EBA methodology is described as follows: “Overall, the number of residential meters was 827,000. When excluding high-use and low-use outliers (suspected seasonal, unoccupied or master-metered), the final number of occupied households for the analysis was approximately 800,000.” (EBA, page 9). The 800,000 figure was used as the basis for further analysis (i.e., “Number of Occupied Households” on page 18), informing the finding that 118,000 low-income households fall under the energy burden threshold.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 007
Dated October 2, 2024

Request:

Why did the Company not revise its IQBD program to increase discount to 90% and 70% for the 0-15% SMI tiers when it issued Advice Number 24-19?

Response:

PGE explained its decision not to update IQBD discount levels in its “Update to EBA Recommendations” filed in UM 2211 on October 4, 2024.

PGE’s approach reflects the view, informed by the EBA, that the current IQBD design appropriately balances meaningful assistance to energy burdened customers, streamlined customer enrollment, and a manageable cost burden to PGE’s customer base, and that the highest priority over the coming year is in improving customer participation rates in IQBD as well as other assistance and bill reduction programs.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 008
Dated October 2, 2024

Request:

Why did the Company not revise its IQBD program to increase the discount to 50% for the 16-30 SMI tier when it issued Advice Number 24-19?

Response:

See PGE's response to Verde Data Request No. 007.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 009
Dated October 2, 2024

Request:

Why did the Company not adopt the recommendation to create a fund to support community-based organizations to enroll, and re-enroll eligible customers?

Response:

PGE explained its decision not to launch a new program navigator fund in its “Update to EBA Recommendations” filed in UM 2211 on October 4, 2024.

At present, PGE partners with both OHCS via Community Action Agencies and Energy Trust to provide program navigation services. Because demand for energy assistance programs frequently outstrip supply and allocations for many programs are not reservable, program navigators would face challenges in enrolling customers efficiently which are unique to Oregon’s assistance framework. As an immediate step, PGE is in the planning stages of developing an online tool for customers to help raise awareness of options and reduce barriers to access programs and tools to help manage with bill management. We estimate that this tool will be available in the second half of 2025.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 010
Dated October 2, 2024

Request:

Why did the Company choose a March 2025 effective date for the revised IQBD program?

Response:

As stated in Advice 24-19, the March effective date was selected to allow appropriate time to update billing systems and program details. This process includes pre-launch outreach and enrollment steps with landlords, as well as stakeholder engagement regarding changes to post-enrollment verification processes.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 011
Dated October 2, 2024

Request:

There was nothing presented in the UE 416 proceeding that would suggest that the August 2024, revision deadline did not intend an effective date in August or an effective date in 2024, correct?

Response:

PGE is not aware of any expectation that the tariff effective date for a new discount program was intended by the Commission order directing PGE to “submit” the new program within 90 days of the EBA. Order 23-386 directed PGE to “complete a low-income needs assessment (LINA) [EBA] by June 30, 2024, and to submit a new discount program informed by the LINA[EBA] within 90 days of receiving the assessment.” Because OPUC rules require tariffs to be filed 30 days prior to their effective date, it is clear that there was no presumption of an effective date in August.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 012
Dated October 2, 2024

Request:

Why did the Company not address accordingly the recommendations for providing some relief to households that are energy burdened but not income eligible for the IQBD program? Why did the Company not adopt a one-time grant program or expand access for on-bill financing?

Response:

The referenced EBA recommendation recommended that PGE “consult with advisory groups on potential solutions to help households under state median income but above energy assistance income thresholds” with a projected timeline of “2025.” As stated in PGE’s “Update on EBA Recommendations,” PGE is planning further consultation with advisory groups on this topic.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 013
Dated October 2, 2024

Request:

Why has the Company not agreed to delay the annual rate increase to April to avoid bill shock from cold weather and rate increases?

Response:

PGE has made an alternative proposal for an April rate effective date. See PGE Exhibit 2100, page 8, and PGE Exhibit 2200, Section III, Subsection B. For additional information regarding PGE's position on this topic see PGE Exhibit 1000, page 8, and PGE Exhibit 1100, Section III, Subsection C.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 014
Dated October 2, 2024

Request:

Why has the Company not addressed the suggestion to reduce fixed charges to better reflect the ability to pay?

Response:

PGE made an alternative proposal for the basic charge of IQBD enrollees. See PGE Exhibit 3100, page 9, which discusses PGE's offer to apply a fixed credit to IQBD customers to offset an increase to the residential basic charge if approved.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 015
Dated October 2, 2024

Request:

Why did the Company not adopt the pilot arrearage project, which for an estimated \$1 million dollars could serve 3,000-4,000 IQBD customers who are in arrears, by applying the IQBD discounts to those balances?

Response:

PGE explained its decision not to extend retroactive arrearage forgiveness in the amount of the applicable IQBD discount level in its “Update to EBA Recommendations” filed to UM 2211 on October 4, 2024.

PGE has assessed impacts and implications of the arrearage relief approach recommended by the EBA and believes other approaches offer more sustainable benefits to customers, such as a payment matching approach to customer arrearages. However, a more robust stakeholder process through UM 2211 is necessary.

October 7, 2024

To: Tonia Moro
Verde

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to Verde Data Request 016
Dated October 2, 2024

Request:

The EBA states that energy efficiency and weatherization programs can be designed to be cost-effective through realized savings in IQBD discounts, correct? Even when under existing rules/concepts a low-income household weatherization may not satisfy cost-effective standards, it is established that spending on energy efficiency for IQBD customers can directly reduce IQBD discounts for those customers, correct? How has the Company addressed that potential cost-savings in this rate case or in its budgets? What does the Company intend to do? When does it intend to do it? The Company could make permanent its ductless heat pump pilot project to immediately take advantage of that IQBD program cost savings, correct? Why has it not done so?

Response:

PGE encourages Verde to refer to consideration of this topic in Docket UM 1893, “Staff Investigation of Methodology and Process of EE Cost-Effectiveness;” see in particular Staff’s July 16, 2024 workshop presentation considering analysis of an arrearage benefit methodology by Energy Trust of Oregon. PGE has been supportive of these efforts. However, energy efficiency avoided cost policy is set by OPUC and applied to program design and implementation work led by Energy Trust of Oregon. PGE’s current actions include engaging constructively in UM 1893 and advancing a co-deployment framework with Energy Trust. Finally, the referenced ductless heat pump pilot is managed and funded by Energy Trust of Oregon, not PGE.