

**MAY 20, 2021, SPECIAL PUBLIC MEETING
REVISED UM 2114 RECOMMENDATIONS**

Based on initial Commission deliberations and further consideration, Staff offers the following revised recommendation in hopes of allowing the Commissioners to find consensus on the extension of the moratorium on disconnections, included as part of the Stipulated Agreement adopted by the Commission at its November 3, 2020 Public Meeting. See Order No. 20-401, <https://apps.puc.state.or.us/orders/2020ords/20-401.pdf>.

Staff's primary recommendations remain unchanged, but each have been expanded with additional requirements (italicized below) to address concerns raised by the Commissioners. The supplemented recommendations, which have been renumbered and edited for further clarity, are as follows:

1. 15-day Late (Disconnection) Notices

Staff Primary Recommendation: Extend the June 15, 2021, date on which the energy utilities may resume providing a 15-day late (disconnection) notice for residential customers before disconnection to July 16, 2021. This would mean no residential disconnections prior to August 1, 2021.

Staff Alternative Recommendation: Maintain the June 15, 2021 date on which the investor-owned energy utilities may resume providing 15-day late (disconnection) notices. This would mean no residential disconnections prior to July 1, 2021.

2. Supplemental Funding

Staff Recommendation: Direct Staff to consult with the parties to the Stipulated Agreement and provide a recommendation for any supplemental funding amount for each of the utilities' arrearage management programs, in addition to the initial amount under the Stipulated Agreement of at least one percent of each utilities' 2019 Oregon retail revenues.

Supplemental Requirements:

a. Staff shall:

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- I. Examine existing AMPs to ensure they are reaching customers most in need.*
- II. Monitor the spend of the current AMP funding, and keep the Commission informed about how much of that has been spent, and how the arrearage balances change after the moratorium is lifted.*
- III. Examine if PGE's Customer Assistance Program should be expanded to include greater allocation of funds to and/or greater visibility for the grant option for those who cannot make payments.*
- IV. Examine each utility's AMP separately to determine what increase, if any, is required to reduce bad debt and narrow criteria to keep customers most in need connected to the system without unnecessarily increasing costs to customers on the system.*
- V. Report back to the Commission at a public meeting before July 15, 2021 on an update on current AMPs, recommended changes to AMP (including the change to PGE's program described above), percentage of customers who are not meeting or falling behind the match requirements, and any agreements for AMP funding increases including PGE's Customer Assistance Program.*

b. Utilities shall continue to develop voluntary programs to increase resources available to low-income customers.

3. Disconnection Practices:

Revised Staff Recommendation (revised to change from "endeavor" to "use reasonable best efforts"): Direct the investor-owned electric and natural gas utilities to use reasonable best efforts not to disconnect

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customers who are participating in an utilities arrearage management program matching option, if applicable; extended time-payment arrangements (TPAs); renegotiated TPAs; making partial payments (10 percent of the minimum amount due to avoid disconnection); have a pledge to receive low-income energy assistance from a Community Action Agency (CAA); have an appointment to seek low-income assistance with a CAA; or have communicated with the utility that they have an appointment for or are working to obtain low-income energy assistance based on enrollment in programs that qualified for the Energy Assistance Stability Coronavirus Relief (EASCR) Program.

Supplemental Requirement #1 (Intended to move from “reasonable best efforts” toward tighter definitions and more accountability for protection from disconnection):

- a. Prior to the moratorium end date, Staff should consult with the parties to develop recommendations for specific characteristics to identify customers that should receive special protection against energy disconnections, and the circumstances under which such protections should be provided. The recommendation should be presented for Commission consideration at a public meeting before July 15, 2021. If Staff is unable to present a joint recommendation, Staff should outline the various characteristics and circumstances considered, and provide a description of the reasons why such characteristics and circumstances were proposed, and were deemed reasonable or unreasonable by Staff.*
- b. Within 30 days following Commission action on recommendations for characteristics and circumstances to be used to protect certain customers against disconnections of energy service, Staff should propose rulemaking that would have the effect of preventing the disconnection of such customers through April 1, 2022.*

Supplemental Requirement #2 (Intended to work in conjunction with “reasonable best efforts” standard to allow utilities flexibility around reconnection of a customer who met the criteria in Staff’s Revised Recommendation but was inadvertently disconnected):

- a. *Prior to the moratorium end date, Staff shall evaluate whether any Commission rules prevent utilities from reconnecting customers without payment of a prescribed percentage of arrears, and present the Commission with a proposal for blanket waiver of such rules in order to give utilities additional discretion through April 1, 2022.*

4. DEI Director

Staff Recommendation: Direct the DEI Director to work with the advisory committee convened under Paragraph 28 of the Stipulated Agreement to analyze and discuss approaches to arrearage management; including, but not limited to, alternatives to disconnections in the post-moratorium period. The DEI Director will report to the Commission no later than the December 14, 2021, Public Meeting, with findings and recommendations.

Supplemental Requirements:

- a. *The DEI Director will report to the Commission no later than the August 24, 2021, Public Meeting, with a status report, and any findings and recommendations that may exist at that time.*