

ITEM NO. RA1

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: September 7, 2021**

REGULAR X CONSENT _____ EFFECTIVE DATE _____ N/A

DATE: September 1, 2021

TO: Public Utility Commission

FROM: Michael Dougherty

THROUGH: Bryan Conway **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 2114)
Investigation into the Effects of the COVID-19 Pandemic on Utility
Customers.

RECOMMENDATION:

Informational Filing – no recommended action.

DISCUSSION:

Issues

This report provides:

1. An update on customer arrears.
2. An update on utilities' Arrearage Management Plans, Deferred Payment Plans, and Energy Assistance.
3. An update on disconnections.

Applicable Law

ORS 756.040 describes the general powers and duties of the Commission in supervising and regulating public utilities and telecommunications utilities, which include representing the customers of any public utility or telecommunications utility and the public generally in all controversies respecting rates, valuations, service, and all matters

of which the Commission has jurisdiction. The Commission is authorized under ORS 756.060 to adopt reasonable and proper rules relative to all statutes administered by the Commission.

The Commission's regulatory authority is further specified in ORS Chapters 756 and 757, as relevant here. Under ORS 756.090, a utility must keep and maintain records as required by the Commission. The Commission may require a utility to furnish information to carry into effect the provisions of ORS chapters 756, 757, 758, and 759, per ORS 756.105.

The Commission has adopted certain administrative rules relevant to the matters discussed herein in OAR Chapter 860, Divisions 21.

Analysis

Background

On March 8, 2020, Governor Brown declared a statewide state of emergency due to the public health threat posed by the novel infectious coronavirus, COVID-19.¹ Several extensions of that order were issued, the last of which extended the state of emergency to June 28, 2021.² Effective June 30, 2021, Governor Brown lifted most COVID-19 restrictions.³ On August 10, 2021, Governor Brown announced a statewide indoor mask requirement. On August 24, 2021, Governor Brown announced the reinstatement of the requirement to wear masks at outdoor events.⁴

On September 24, 2020, the Commission authorized Staff and the affected investor-owned energy utilities and stakeholders to execute a stipulation that was developed during the Commission's Investigation into the Effects of the COVID-19 Pandemic on Utility Customers.

During the timeframe between September 24, 2020 and October 23, 2020, Parties refined the Energy Term Sheet and Stipulated Agreement on terms and conditions to assist customers and utilities during the current COVID-19 pandemic and the aftermath of the pandemic.

¹ EO 20-03 (March 8, 2020).

² EO 20-24 (May 1, 2020); EO 20-30 (June 30, 2020); EO 20-38 (September 1, 2020); EO 20-67 (December 17, 2020), EO 21-05 (February 25, 2021), and EO 21-10 (April 29, 2021).

³ EO 21-15 (June 25, 2021).

⁴ See OAR 333-019-1025, effective August 27, 2021; Governor Brown Press Release, August 24, 2021, available at: <https://www.oregon.gov/newsroom/Pages/NewsDetail.aspx?newsid=64307>; Governor Brown Press Release, August 11, 2021, available at:

<https://www.oregon.gov/newsroom/Pages/NewsDetail.aspx?newsid=64250>.

Parties include (though are not limited to): utilities, Clackamas County Social Services, Community Action Partnership of Oregon (CAPO), Community Action Agency of Washington County, Community Energy Project (CEP), Multnomah County Office of Sustainability, Northwest Energy Coalition (NWEC), Oregon Citizens' Utility Board (CUB), and Verde.

At its public meeting on November 3, 2020, the Commission approved the UM 2114 Stipulated Agreement. See Order No. 20-401, <https://apps.puc.state.or.us/orders/2020ords/20-401.pdf>.

At its special public meeting on February 23, 2021, the Commission extended the April 1, 2021, date on which the energy utilities may resume providing a 15-day late notice for residential customers before disconnection to June 15, 2021. The Commission also directed Staff to report back to the Commission in the middle of May regarding the moratorium and whether additional changes should be considered. See Order No. 21-057, <https://apps.puc.state.or.us/orders/2021ords/21-057.pdf>.

At its public meeting on March 23, 2021, the Commission approved the Arrearage Management Plans (AMP) of Avista, Cascade Natural Gas (Cascade), NW Natural (NWN), Idaho Power (IPC), and Pacific Power (PAC). The Commission previously approved Portland General Electric's (PGE) AMP on February 11, 2021.

At its special public meeting on May 23, 2021, the Commission took the following actions, as memorialized in Order No. 21-164; <https://apps.puc.state.or.us/orders/2021ords/21-164.pdf>:

- Extended the date to send disconnection (late) notices to customers until July 16, 2021;
- Directed Staff to work with stakeholders to possibly supplement arrearage management plans;
- Directed Staff to 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. Further directed Staff, if a joint recommendation cannot be presented, to 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;

- Directed Staff, within 30 days following Commission action on recommendations for characteristics and circumstances to be used to protect certain customers against disconnections of energy service, to propose rulemaking or other process that would have the effect of preventing the disconnection of such customers for a defined period of time; and
- Directed the DEI Director to 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 concerning the workshops convened under Paragraph 28 of the UM 2114 Stipulated Agreement.

At its special public meeting on July 13, 2021, the Commission, amongst other directives, directed Staff and the Diversity, Equity, and Inclusion (DEI) Director to further examine these and other circumstances recommended by stakeholders during workshops 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, Commission Order No. 21-236, <https://apps.puc.state.or.us/orders/2021ords/21-236.pdf>.

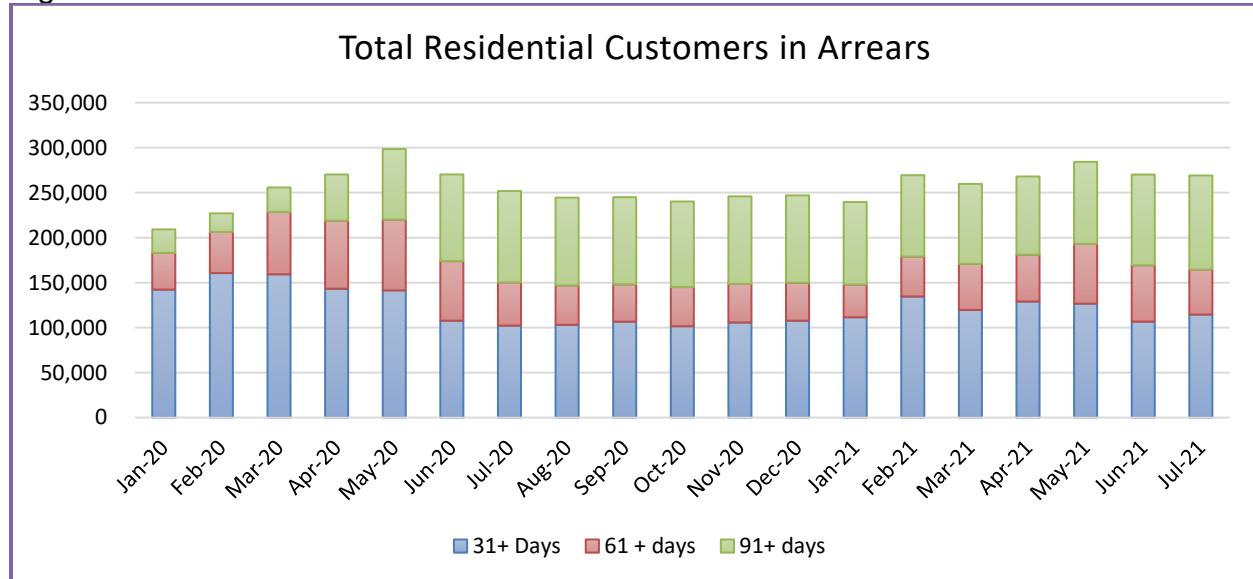
Arrearages

The following graphs show the changes in energy utility customer arrearages from January 2020 to July 2021.

Total Customers in Arrears

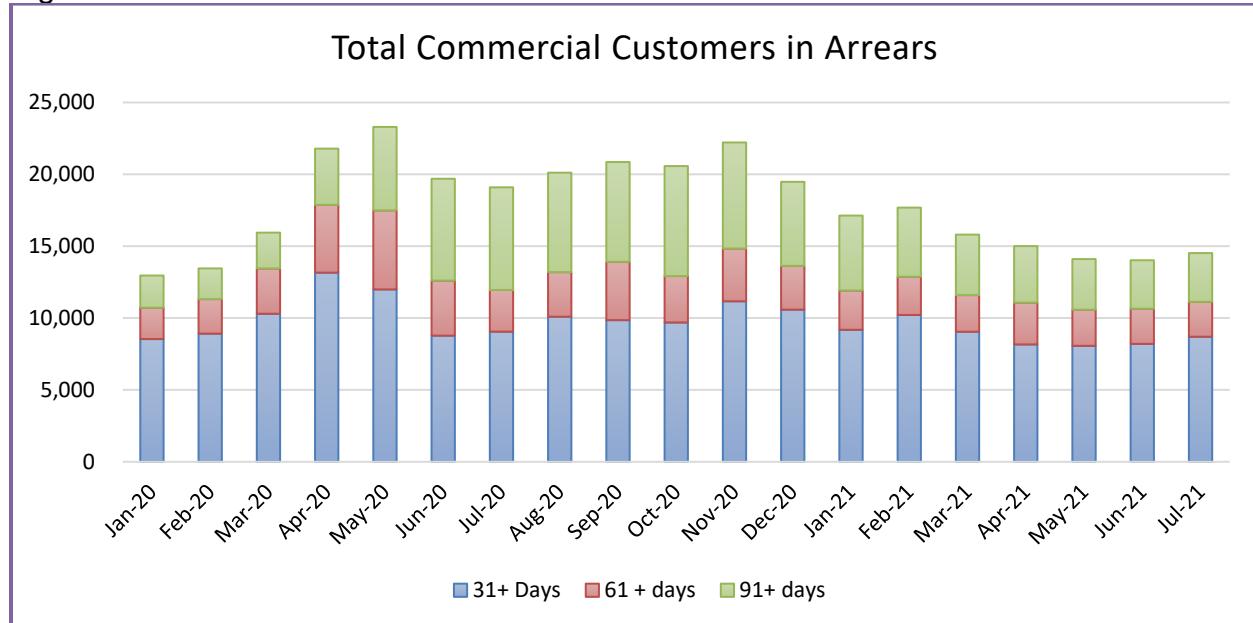
As can be seen below, the total residential customers in arrears in July 2021 (269,075) fell by 1,061 from June 2021 (270,136), although the 30 and 90 day baskets saw a slight increase.

Figure 1 – Total Residential Customers in Arrears



As shown in Figure 2 below, total commercial customers in arrears in July 2021 (14,520) increased from June 2021 (14,021), but are still considerably lower than the July 2020 numbers (19,095).

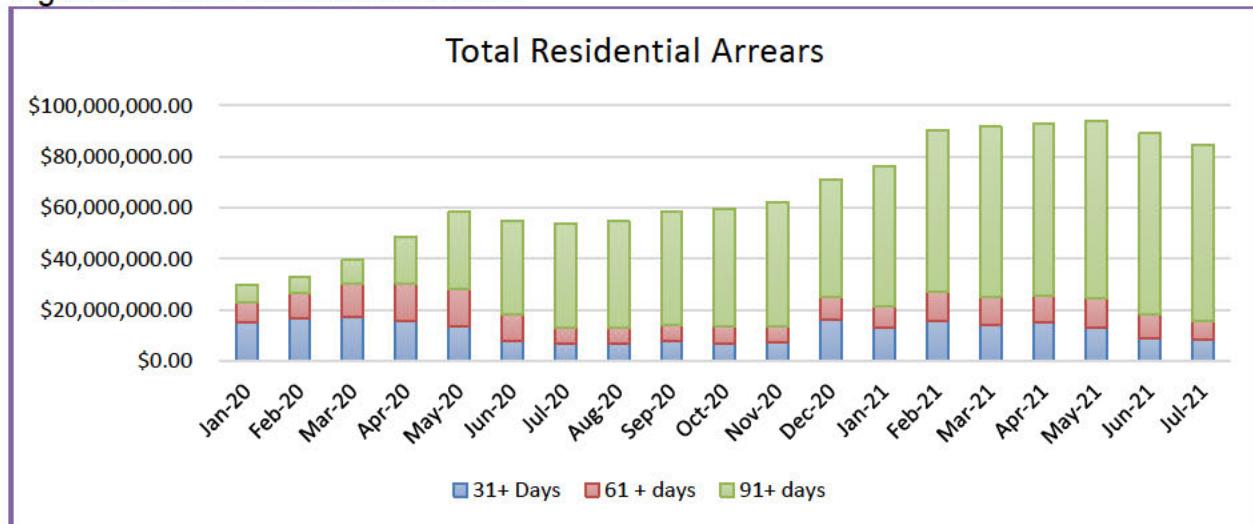
Figure 2 – Total Commercial Customers in Arrears



Total Arrears Balance

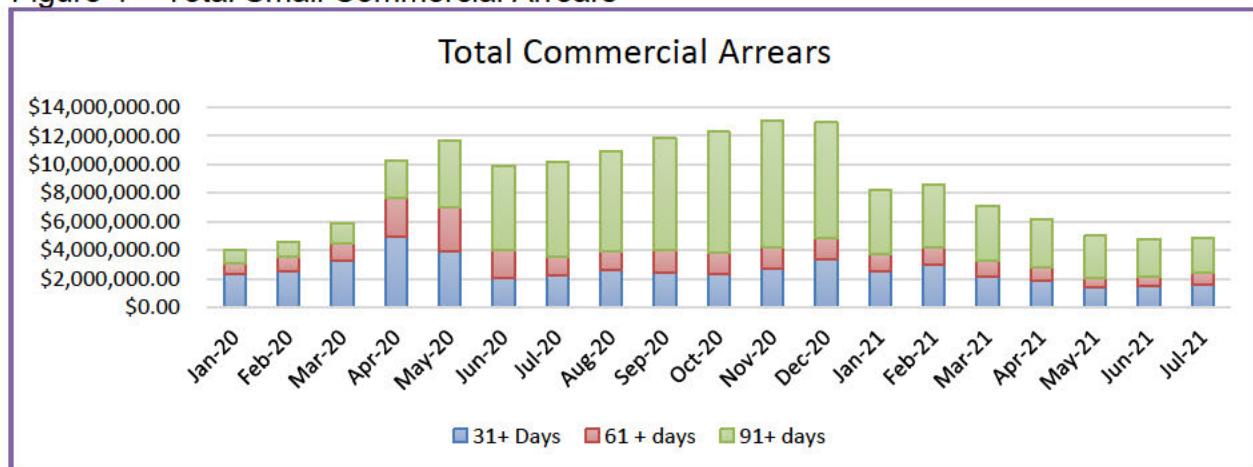
As shown in Figure 3 below, total residential arrears balance fell by \$4.3 million (decreases across all three baskets) from June 2021 to July 2021. From May 2021 to July 2021, the total residential arrears balance has decreased \$9.3 million (11 percent decrease).

Figure 3 – Total Residential Arrears



Also on a positive note as shown in Figure 4 below, total small commercial arrears have remained relatively stable with a slight overall increase (\$59 thousand), but with a \$223 thousand decrease in the 91+ day bucket.

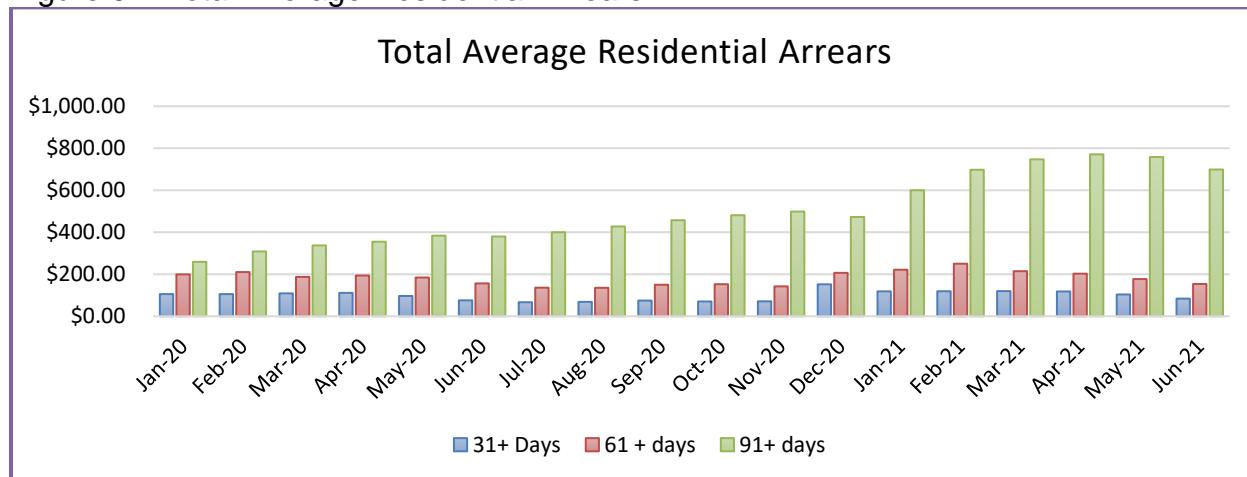
Figure 4 – Total Small Commercial Arrears



Average Arrears Balance

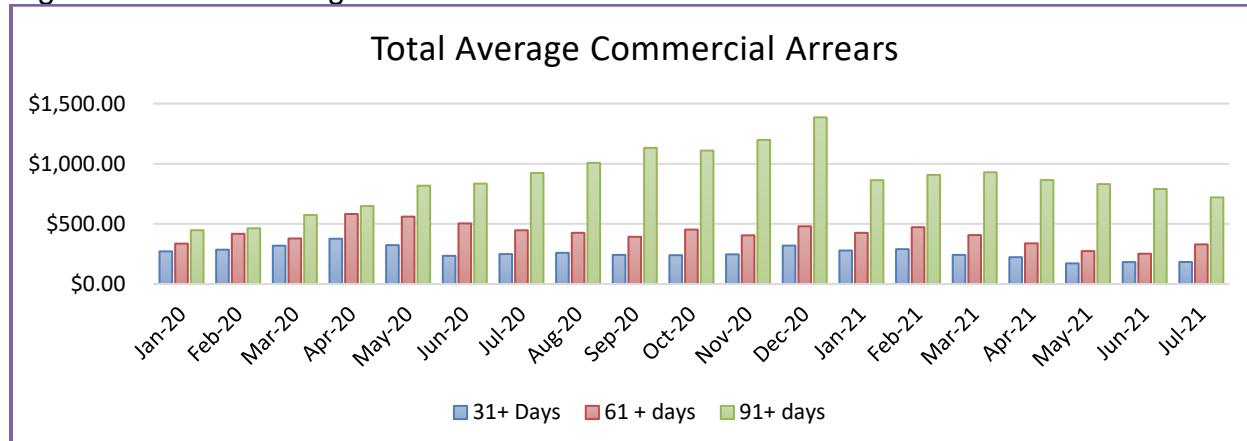
As shown in Figure 5 below, average residential arrears balances have decreased in all three baskets from June 2021 to July 2021. The 91+ day basket decreased from \$699 to \$658, and the 61+ day basket decreased from \$154 to \$144, which is lower than the pre-pandemic January 2020 level (\$199). The 31+ day basket also decreased from \$83 to \$76, which is lower than January 2020 level (\$105).

Figure 5 – Total Average Residential Arrears



As shown below in Figure 6, total average small commercial arrears is also decreasing with both the 31+ (\$183) and 61+ (\$329) day baskets being lower than pre-pandemic levels (\$271 and \$336 respectively). With that said, the 91+ basket is significantly higher than January 2020 (\$721 as compared to \$447), but has been decreasing since December 2020, and is significantly lower than July 2020 levels (\$923).

Figure 6 – Total Average Small Commercial Arrears



The two following charts show the changes over time on customer arrearages.

Figure 7 – Residential Customer Past Due Balances – By Utility

Residential Customer-Level Past Due Balances

Data is segmented by utility

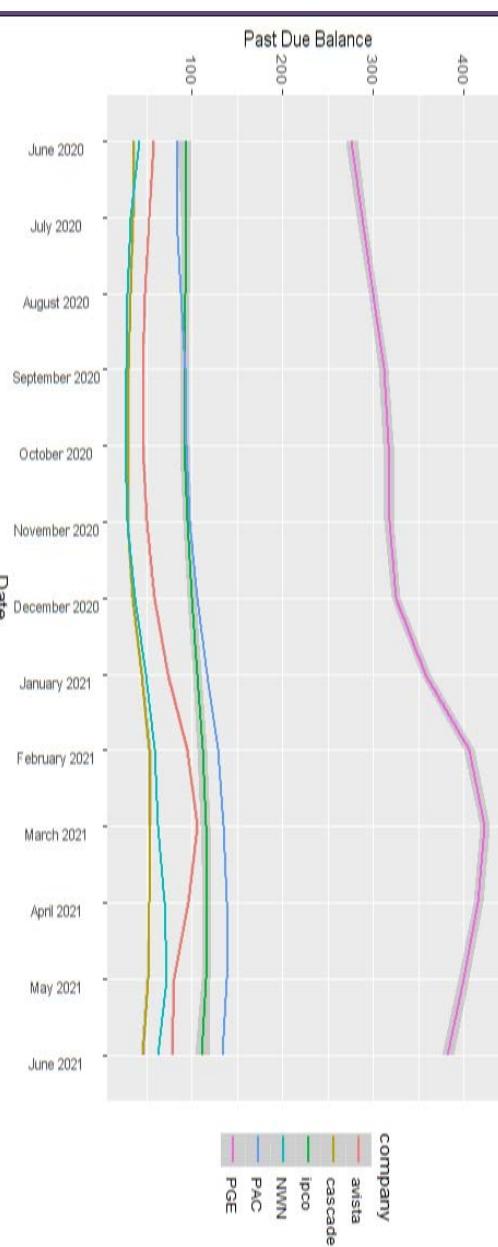


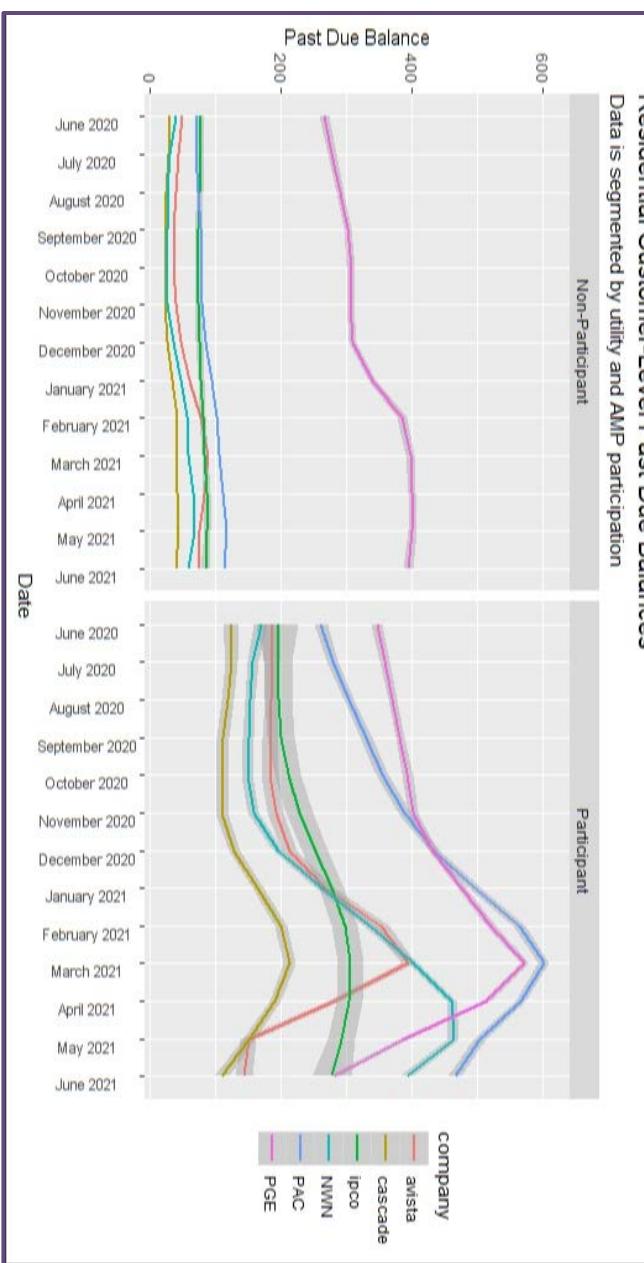
Figure 8 – Residential Customer Past Due Balances – AMP Participation

Residential Customer-Level Past Due Balances

Data is segmented by utility and AMP participation

Non-Participant

Participant

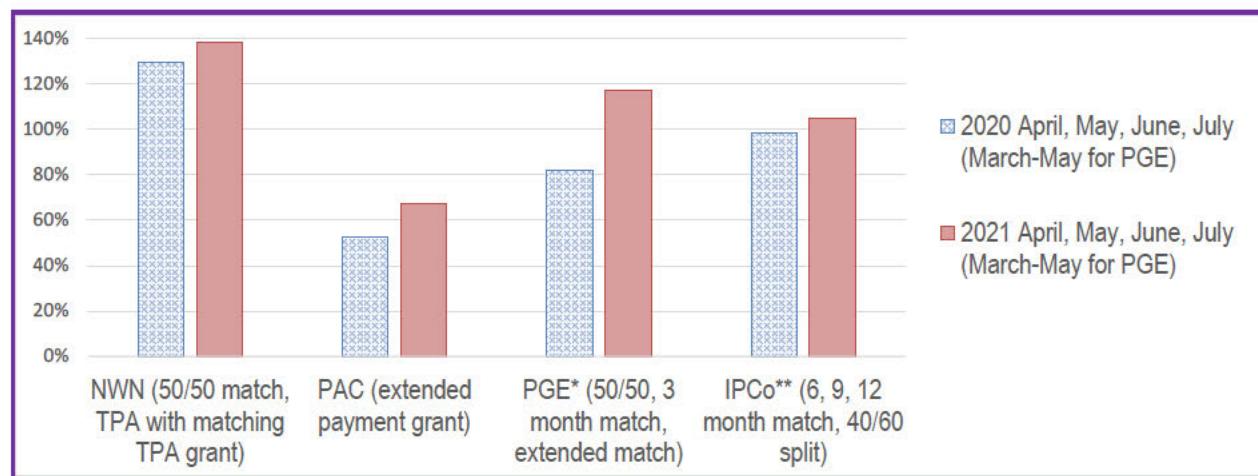


As can be seen from the above graphs, arrears balances are decreasing for customers participating in AMPs versus those who do not. Customers who participated in more than one program saw the steepest and most rapid decline in arrears. Staff also observed a greater representation of customers with higher balances. It is important to note that other factors will play a part in the decrease, including participation in energy assistance, time payment arrangements, and engagement with utilities.

Although it could be argued that declining arrearages will occur by definition because the utility is paying off arrears – specifically, with sufficient debt forgiveness, there would be no remaining arrears. However, Staff counters that customers that might not have made payments are making payments because of the AMP matching programs.

To verify this, Staff looked at individual customers and compared the payments each AMP matching program participants made in April 2020 to July 2020 versus the payments made by that same customer a year later. Overwhelmingly, customers in the AMP matching programs made larger average payments in 2021 than during the same months in 2020, as shown in Chart 1:

Figure 9 - Customer payments before and during participation in an AMP matching program



*Aggregate payments made by the AMP-participating customers as a proportion of aggregate bills, funds payed on the customers' behalf are excluded.

*For PGE, Staff computed customer payments as: current arrearage plus bill minus debt forgiveness minus next period's arrearage (NWN and PAC provided customer payments).

**For IPC, Staff staggered the bill and payments data by a month (March bills for April payments) as IPC's data was provided as payments during the month instead of funds paid from the previous month's bill.

Avista and Cascade are not included in Figure 9 as they do not have matching programs. However, customers participating in Avista's automatic and forgiveness grant

programs paid less in April to July 2021 than during the same months in 2020, potentially highlighting ability to pay as a determinant in whether customers participate in automatic grants versus matching programs.

For NW Natural and PGE, the majority of matching program participants paid more in 2021, whereas surprisingly, the opposite was true for PAC. Looking at individual customer payments for PAC, some customers made large payments in 2021, so as to increase the aggregate payments in 2021 above those in 2020; and many customers paid even amounts such as exactly \$500 or exactly \$1,000, which Staff views as further evidence of participants responding to the ability to have their payment matched.

In summary, on average some customers who did not pay their utility bills in full, began doing so after participating in an AMP matching program.

The following two tables provide summaries of arrears.

Table 1 – Summary of Arrears as of July 31, 2021

	31+ Days	61 + days	91+ days	Total \$	Customers
PGE	\$3,460,643	\$2,664,419	\$27,342,508	\$ 33,467,570	80,977
PAC	\$2,701,113	\$2,605,679	\$30,543,379	\$ 35,850,171	88,310
AVA	\$112,730	\$115,022	\$1,566,707	\$ 1,794,459	10,441
IPC	\$39,784	\$27,995	\$462,896	\$ 530,674	1,394
CNG	\$61,319	\$51,848	\$647,694	\$ 760,862	5,833
NWN	\$2,327,943	\$1,747,809	\$8,171,934	\$ 12,247,686	82,120

Table 2 – July 2021 Residential Arrears Summary Data

July Arrears data	
Total Arrears	\$84,651,423
Total Customers in Arrears	269,075

Staff continues to believe that August and September disconnect notices, disconnects, and reconnects will be critical in determining the effect of relief efforts of AMPs, TPAs, and energy assistance on changes in total arrears, customers in arrears, and average arrears balances.

Arrearage Management Plan Funds (Residential Customers)

The following tables highlight AMP status as of July 31, 2021. These amounts will continue to change monthly.

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Table 3 – AMP Funds to date July 31, 2021

AMP Funds							
	PGE	PAC	AVA	IPC	CNG	NWN	
February	\$ 23,694	\$ -	\$ -	\$ -	\$ -	\$ -	
March	\$ 1,325,039	\$ -	\$ -	\$ 18,128	\$ -	\$ -	
April	\$ 2,404,292	\$ 2,869,785	\$ 491,040	\$ 73,527	\$ 169,236	\$ -	
May	\$ 1,696,713	\$ 1,333,936	\$ 150,136	\$ 48,243	\$ 87,176	\$ 141,932	
June	\$ 1,519,569	\$ 761,778	\$ 41,811	\$ 45,733	\$ 90,244	\$ 240,402	
July	\$ 1,448,496	\$ 1,081,398	\$ 39,601	\$ 28,184	\$ 39,527	\$ 538,938	
Total Expended*	\$ 8,419,496	\$ 6,046,897	\$ 722,343	\$ 210,599	\$ 386,400	\$ 921,271	
Committed	\$ 7,673,997	\$ 1,088,679	\$ -	\$ 46,044	\$ -	\$ 672,738	
Authorized	\$ 17,557,000	\$ 12,681,000	\$ 889,890	\$ 519,908	\$ 707,517	\$ 6,167,000	
Remaining	\$ 1,463,507	\$ 5,545,424	\$ 167,547	\$ 263,265	\$ 321,117	\$ 4,572,990	
<i>Percent Remaining</i>		8%	44%	19%	51%	45%	74%

Note: Discrepancies between summed totals and totals reported are due to the movement of committed funds and changes occurring after the submitted report.

Table 4 – Residential Customers Participating in AMPs to date July 31, 2021

Residential Customers						
	PGE	PAC	AVA	IPC	CNG	NWN
Total AMP Participants	34,417	15,040	1,673	631	1,397	3,504
Total Customers	803,067	539,766	94,542	13,743	69,344	623,614
% Participating in AMP	4.286%	2.786%	1.770%	4.591%	2.015%	0.562%

Table 5 – AMP Program Types to date July 31, 2021

AMP Program Types (\$ spent)							
	PGE	PAC	AVA	IPC	CNG	NWN	Total
Automatic Grants	\$ -	\$ -	\$ 215,208	\$ -	\$ 92,694	\$ -	\$ 307,903
Instant Grants	\$ 595,608	\$ 5,090,986	\$ 507,135	\$ 57,971	\$ 293,706	\$ 771,495	\$ 7,316,901
Short-Term Match	\$ 4,770,258		\$ -	\$ 141,205	\$ -	\$ 145,125	\$ 5,056,588
Extended Match	\$ 3,053,633	\$ 955,911	\$ -	\$ 11,423	\$ -	\$ 4,652	\$ 4,025,619

Table 6 – AMP Program Types (Count of Customers) to date July 31, 2021

	AMP Program Types (count of customers)						
	PGE	PAC	AVA	IPC	CNG	NWN	Total
Automatic Grants	-	-	654	-	329	-	983
Instant Grants	2,128	12,624	1,019	273	1,068	2,819	19,931
Short-Term Match	22,393	-	-	296	-	564	23,253
Extended Match	9,896	2,416	-	62	-	121	12,495

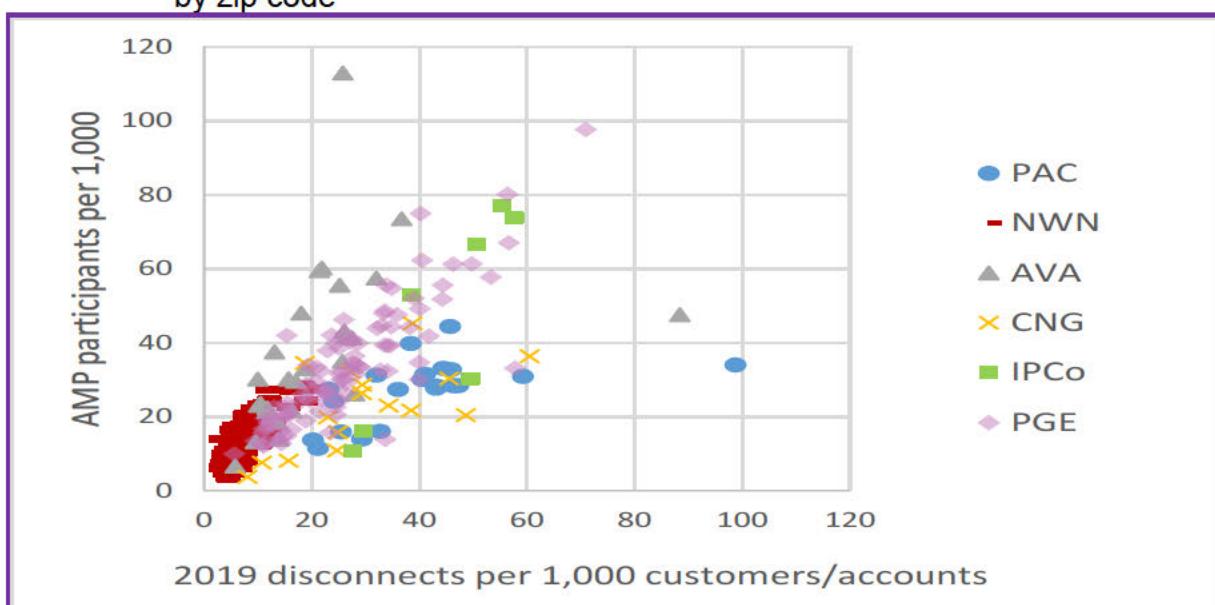
*Automatic Grants do not require an application
 **Instant Grants include application based AMP assistance not requiring a match
 *** Short-Term Match include AMP matching programs less than 12 months
 **** Extended Match include all AMP matching programs designed to be 12 months or more

Table 7 – Funds Expended / Recipients Summary to date May 31, 2021

	Funds Expended	Recipients
No-Match Awards	\$ 7,624,803	20,914
Matching Awards	\$ 9,082,207	35,748

During Workshops, utilities discussed their outreach to customers to advertise the availability of the AMP programs. At the zip code level, there is a clear correlation between the proportion of customers disconnected in the past and the proportion of customers participating in an AMP program. As such, zip codes with a high historical rate of disconnections are not visually being left out of the AMP programs as demonstrated below in Figure 10.

Figure 10 - Frequency of disconnections in 2019 versus frequency of AMP participants by zip code



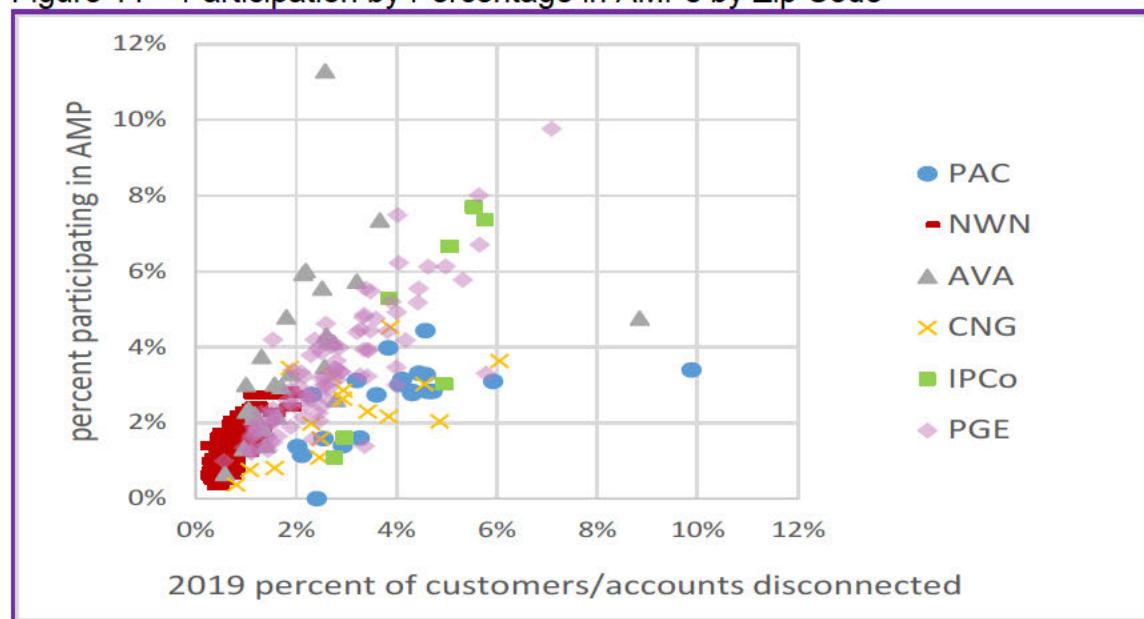
*Zip codes with multiple utilities appear multiple times in Figure 10 and zip codes with fewer than five disconnects or AMP participants are not shown.

*PAC data is by County because that is how PAC reports for RO 12. Staff used <https://worldpopulationreview.com/zips/oregon> to convert the data. Zip codes do not always perfectly align with counties.

In Figure 10 above, each of the utilities have a similar upward sloping scatter plot (more scatter points indicates a utility that serves more zip codes).

In summary, Figure 10 confirms that zip codes with a greater frequency of historical disconnections also have a greater proportion of AMP participants. Figure 11 below provides an additional look at participation.

Figure 11 – Participation by Percentage in AMPs by Zip Code



Based on responses to Staff's Information Requests, utilities were asked if they believe AMP funds should be increased. The following table is a summary of responses.

Avista

As of August 23, 2021, Avista had approximately \$67,000 in available funding for its Debt Relief program. Avista expects this balance will be spent by the end of August. It is important to note that Avista's total arrears was \$1,794,459 at the end of July 2021. The positive is that the 31+ and 61+ buckets are lower than pre-pandemic levels. However, the 91+ bucket is at a high of \$1,556,707.

Two other positives are that Avista has strong working relationships with Community Action Agencies in its Oregon service territory; and will commence its Advice No. 21-02-G, Residential Low Income Rate Assistance Program on October 1, 2021. Avista introduced a permanent AMP using LIRAP funds as a potential long-term solution for low-income customers with high energy burdens that find themselves in a perpetual struggle to stay current with their costs of living.⁵

Cascade

From conception to date, Cascade has been averaging \$21,000 per week in bill assistance through the Big Heart programs. Based on the remaining \$266,300 of bill assistance funds available and the weekly rate of assistance provided, Cascade believes the bill assistance will be fully spent around the week of November 15, 2021. Cascade does not anticipate requesting any additional funds; however, if proposals arise or the situation changes that require additional funds beyond what is currently available, then Cascade is open to the idea of requesting additional assistance funds.

NW Natural

Per NW Natural's AMP report filed in RG 98, through July 2021, \$921,000 in AMP grants have been credited to customer accounts and another \$673,000 have been committed for pending grants, totaling \$1.6 million.

As a result, 74 percent of the total \$6.2 million AMP authorized funds remain available for customer arrearage assistance. At the current uptake, NW Natural anticipates that AMP grant funds will last well into the heating season and possibly until 2022. At this time, NW Natural is not requesting additional AMP funding. However, NW Natural will continue to monitor the effect of resuming disconnection notices and practices has on its AMP and arrearage balances to determine if such a request appears to be a crucial component in assisting customers in the future.

Idaho Power

Based on Idaho Power's average monthly expenditures and commitments in the AMP, the Company estimates its initial funding will be fully expended and committed by mid-to late-December 2021.

The Company continues to monitor the trend of customers' 31+ days past due arrearages and the total funds remaining within its AMP, but has not yet determined whether additional AMP funding will be requested.

⁵ See Docket No. ADV 1254, <https://edocs.puc.state.or.us/edocs/UBF/adv1254ubf142518.pdf>.

PGE

On August 12, 2021, PGE called Consumer Services and stated that they have exhausted their AMP funding (includes pledged funds) and August 13, 2021, will be the last day they provide AMP funds for new applicants.

Prior to the date above, PGE filed Advice Filing Advice No. 21-20, Schedule 307, Residential Bill Assistance Program Additional Funding, <https://edocs.puc.state.or.us/efdocs/UAA/uaa153428.pdf>.

The filing was updated on August 27, 2021, with Less than Statutory Notice, <https://edocs.puc.state.or.us/efdocs/UAC/adv1301uac12122.pdf>. In the filing, PGE requests an additional \$6 million that will be directed to three grant programs, Customer Assistance, Reconnect Assistance, and Extended Match Program.

- Customer Assistance – One-time Company bill payment, up to \$500, to help Customers get current on their balance utilizing an instant grant. This assistance will be made available to Customers who are unable to get current without assistance. This assistance will also cover any remaining Customer balance after receiving energy assistance, up to \$500. Customer Assistance funds will not leave a credit on the account. This program will run until assistance funds are depleted but in no event will continue past December 31, 2021.
- Reconnect Assistance – One-time Company bill payment, up to \$500, to assist in reconnecting disconnected Customers. This program will run until assistance funds are depleted but in no event will continue past December 31, 2021. Company will also offer enrollment in TPA plan up to one year. Customers that used one of the other options previously are eligible.
- Extended Match Program – A bill payment plan under which PGE will match customer payments for up to 12 months. To be eligible, a customer must enroll in a Time Payment Arrangement (TPA) plan, up to 24-months, to match payments up to the first 12 months of a TPA. Matching stops after 12 months, when total account balance reaches \$0, or if the customer is disconnected. The Extended Match Program will remain available until 50 percent of the additional \$6 million funding is allocated or October 31, 2021, whichever occurs sooner.

Customers can combine programs and receive up to \$1,000 in assistance.

Pacific Power

As of August 18, 2021, Pacific Power had committed funds of \$7,135,576, had a remaining balance of \$5,545,424, and is expecting to have funds available until the first

week of December 2021. Pacific Power is not anticipating any requests for additional funding.

Deferred Payment Plans

Commission Order No. 21-057, <https://apps.puc.state.or.us/orders/2021ords/21-057.pdf>, required Pacific Power to file a status report on its Deferred Payment Plan (DPP) on July 20, 2021 and October 20, 2021, including, at minimum: the number of both residential and small commercial customers enrolled, the average length of DPPs, and the number/percentage of DPPs for which the terms have been breached by a customer.

Pacific Power began tracking DPPs in April 2021 when it implemented its Bill Assistance Plus program.

DPPs are continuing to be offered to AMP participants and the data collection is ongoing. Payment plans are not considered defaulted unless the service is disconnected for non-payment and allows customers to catch up on payment plans at any time prior to a service disconnection.

As the current disconnection moratorium continues, no payment plans have defaulted and will continue to bill out until the duration of the plan is met or the customer renegotiates the payment plan. Since April 1, 2021:

- 32 DPPs were paid off.
- 120 customers have not made a payment on the account.
- 52 DPPs were renegotiated.
- 23 accounts were closed by the customer.
- 197 customers have higher past due balances.
- 462 customers have lower past due balances.

Non-residential customers are eligible for a DPP, but are not eligible for the AMP; and the data evaluation is not complete due to the need for ongoing reporting refinements. As the DPP's mature, more information will be available to evaluate the long term and short term benefit of the plan.

Energy Assistance

The following is the status of Low Income Home Energy Assistance Program (LIHEAP – available to Investor-Owned and Consumer Owned utilities) and Oregon Energy Assistance Program (Pacific Power and Portland General Electric) funds as of August 31, 2021.

Table 8 – Energy Assistance (LIHEAP and OEAP)

	LIHEAP 21	OEAP Total⁶	
ACCESS	\$489,917	\$190,256	
CAO	\$421,151	\$314,064	
CAPECO	\$949,214	\$28,165	
CAT	\$202,720	\$158,432	
CCNO	\$501,633	\$67,025	
CCSSD	\$608,804	\$788,569	
CINA	\$271,834	0	
CSC	\$1,073,086	\$418,632	
KLCAS	\$624,202	\$98,872	
LCHSD	\$1,038,940	\$36,747	
MCCAC	\$141,210	\$65,911	
MULTCO	\$2,481,671	\$2,888,595	
MWVCAA	\$1,307,432	\$247,036	
NIMPACT	\$330,548	\$157,598	
ORCCA	\$351,230	\$126,310	
UCAN	\$754,238	\$133,552	
YCAP	\$234,102	\$148,522	
Total	\$11,781,931	\$5,868,286	\$17,650,216

Table 9 below highlights the current annual natural gas assistance program funding.

Table 9 – Natural Gas Assistance Programs

Program	Funding
OLGA (NW Natural)	\$2.8 Million
LIRAP (Avista)	\$255,000
OLIBA (Cascade Natural Gas)	\$120,000

*The amounts above reflect annual funds and not balances to date.

In addition to the funds listed in Table 8 above, there is approximately \$44 million of American Rescue Plan Act of 2021 (ARPA) funds currently available. An additional \$10 million of ARPA funds are projected to be received in January 2022, and a LIHEAP 2022 allocation may be released in a couple of months that could add another \$30 million to energy assistance.

⁶ House Bill 2739 increased Oregon Energy Assistance Program funds from \$20 million annually to \$30 million annually through 2023.

These federal funds are considerable and as discussed in previous public meetings, the use of federal funds compliments and reduces the use of customer funds.

Residential Disconnection Status

The following information on disconnects, as of August 20, 2021, was provided by utilities.

Avista

As of August 23, 2021, Avista has disconnected 155 residential customers. Many customers are making payment plans and Avista has seen an increase in use of AMP funding from customers in the collections cycle. However, there are some customers that have not responded to notices, that Avista cannot get ahold of, or have stated they are not using gas and to go ahead and disconnect. Avista has been proactive in working with customers and Community Action Agencies.

Cascade

Cascade's COVID-19 reports were built to be provided on a monthly or quarterly basis; and the Company is unable to provide weekly information without IT redesigning the report to provide the information in such a format. With that said, Cascade has been proactive in working with customers and Community Action Agencies.

NW Natural

NW Natural was unable to provide data provided for August disconnects on a mid-month basis, as this data is only available and verifiable on a monthly basis, after month-end close has occurred. According to NW Natural, data for the month of August will be provided as soon as practicable following month-end close.

Due to the heavy technical adjustments the utility has undertaken in light of the new circumstances identified to protect customers from disconnection in Order No. 21-236, NW Natural did not issue its first 5-day urgent notices until the week of August 9, and the first possible disconnections will not occur until August 19, 2021. See <https://apps.puc.state.or.us/orders/2021ords/21-236.pdf>.

As with other utilities, NW Natural has been proactive in working with customers and Community Action Agencies.

Idaho Power

As of August 16, 2021, Idaho Power disconnected 30 residential customers and reconnected 14 customers within 14 days and an additional four customers in the two to seven day time frame. Of the customers disconnected, none of the 30 residential customers disconnected for non-payment contacted the Company after having received

their 15-day reminder notice. Idaho Power has been proactive in working with customers and Community Action Agencies.

Pacific Power

As of August 20, 2021, Pacific Power has not disconnected any residential customers. Additionally, Pacific Power has been proactive in working with customers and Community Action Agencies.

PGE

PGE did not begin disconnections until August 18, 2021. At the August 10, 2021, Community Action Partners of Oregon Energy Policy Committee meeting, PGE mentioned that disconnections would start with customers that owe \$2,000 or more and are 91+ days past due. In these cases, PGE would follow the characteristics of customers identified for protection from disconnection in Commission Order No. 21-236. As with other utilities, PGE has been proactive in working with customers and Community Action Agencies.

During the August 26, 2021, ADV 1301 Filing meeting, PGE stated that to date, 200 customers were visited and 12 were disconnected.

Commercial Disconnection Status

The following tables highlight small commercial disconnections in July 2021 and to date. The total of all small commercial customers disconnected year-to-date do not equal currently disconnected small commercial customers. Many reconnections are prompt, and a small number of disconnections shown were for reasons other than non-payment. With that said, small commercial disconnections are relatively low (less than one percent of small commercial customers). Additionally, PGE suspended commercial disconnections during the week of August 9, 2021, due to extreme heat conditions.

Table 10 – Oregon Small Commercial Disconnections – July 2021

Company	Small Commercial Customers	Small Commercial Disconnects	Disconnects as Percentage of Small Commercial Customers
Avista	11,898	24	0.20%
Cascade Natural Gas	10,294	8	0.08%
Idaho Power Company	2,593	1	0.04%
Northwest Natural Gas	56,973	43	0.08%
Pacific Power	68,638	76	0.11%
Portland General Electric	105,579	46	0.04%
July 2021 OR Totals	255,975	198	0.08%

Table 11 – Oregon Small Commercial Disconnections – Year to Date

Company	Small Commercial Customers	Small Commercial Disconnects	Disconnects YTD as Percentage of Small Commercial Customers
Avista	11,898	151	1.27%
Cascade Natural Gas	10,294	120	1.17%
Idaho Power Company	2,593	9	0.35%
Northwest Natural Gas	56,973	540	0.95%
Pacific Power	68,638	254	0.37%
Portland General Electric	105,579	257	0.24%
2021 YTD OR Totals	255,975	1,331	0.52%

Conclusion

AMPs, extended TPAs, energy assistance, DPPs, additional customer protections, and outreach by utilities are helping to keep many customers connected to energy during the COVID-19 pandemic. With that said:

- Arrearages and customers in arrearages remain high.
- There is still data that needs to be collected as utilities have only recently commenced disconnections.

Staff will update the Commission in November as Commission Order No. 21-057 directs Staff to report to the Commission at the November 16, 2021, Public Meeting, the status of Arrearage Management Programs, status of Deferred Payment Plans, status of all terms in the Stipulated Agreement, status of customer eligibility agreements, and status of all workshops outlined in paragraphs 27 through 34 of the UM 2114 Stipulated Agreement.

PROPOSED COMMISSION MOTION:

Informational Filing – no recommended action.