

Oregon Citizens' Utility Board

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April 6, 2026

Via Electronic Filing

Public Utility Commission of Oregon
201 High St SE, Suite 100
Salem, Oregon 97301-3398
puc.filingcenter@puc.oregon.gov

Re: Docket No. UG 527 –Oregon Citizens' Utility Board Opening Testimony of Sarah Wochele & Bob Jenks Errata

The Oregon Citizens' Utility Board (CUB) files these errata to the Opening Testimony of CUB Witnesses Sarah Wochele & Bob Jenks.

- The erratum to CUB/100 provides accurate data and commentary regarding both the number of households who were impacted by the Company's temporary winter disconnection moratorium, and the lengths of time they remained disconnected for on pages 29-30.

Enclosed are the redlined pages with the corrections identified, as well as a clean copy. Please contact me if you have any questions about this filing.

Sincerely,

/s/ Lizzie Lesch-Abhaya

Lizzie Lesch-Abhaya
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BEFORE THE PUBLIC UTILITY COMMISSION

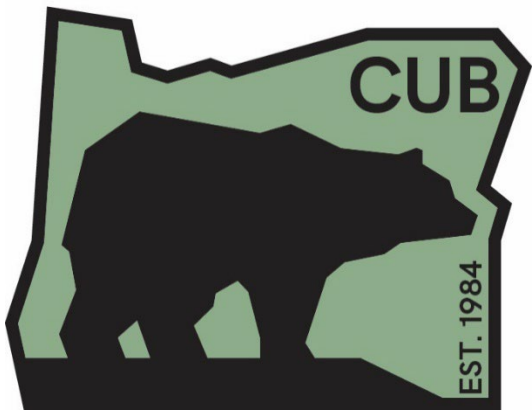
OF OREGON

UG 527

In the Matter of)
)
NORTHWEST NATURAL GAS COMPANY,)
dba NW NATURAL,)
)
Application for an Alternative Rate Mechanism,)
New Schedule 123.)
_____)

OPENING TESTIMONY
OF THE
OREGON CITIZENS' UTILITY BOARD

March 18, 2026



BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UG 527

OPENING TESTIMONY OF SARAH WOCHOLE AND BOB JENKS
ON BEHALF OF THE OREGON CITIZENS' UTILITY BOARD

CUB 100

March 18, 2026

**Residential Customer Impact of Rate Increase
Wrongful Disconnections during Winter Moratorium
Alternative Rate Mechanism**

1 **Q. When exactly did the Company realize its error regarding not implementing the**
2 **temporary winter disconnection moratorium?**

3 A. The Company states that it was not CUB's DR 31-32 inquiring about the data reporting in
4 RO 16 which uncovered the error, but that it realized the error upon its submission of the
5 report into RO 16 on January 29, 2026.⁷² It states it began researching the cause for the
6 error at this time, but that CUB's February 12th, 2026 DRs 31-32 "further heightened the
7 priority of finding the cause."⁷³

8 **Q. How were customers impacted?**

9 A. CUB is still working through the impacted customer data provided by the Company at this
10 time. What we can say is that **initially** the Company stated that the majority of impacted
11 households were reconnected the same day or next day following their mistaken
12 disconnection in November or December.⁷⁴ **However, as there were more impacted**
13 **households than initially identified, it is actually the case that exactly half of impacted**
14 **customers (N=99) were reconnected the same day or next day following their mistaken**
15 **disconnection in November or December.**⁷⁵ It is worth noting though that there were **at**
16 **least 20 40** households who were disconnected for **3 2-13** days, **12 16** families who were
17 disconnected for two weeks **(14 days)** or more, with a household who remained
18 disconnected for 43 days who had to pay \$572.67 to reconnect, another household who
19 remained disconnected for **50 78** days who was only \$54.73 past due and had to pay \$50
20 to reconnect, another disconnected for 61 days who had to pay \$714.52 to reconnect, and

⁷² CUB/123 Wochele-Jenks/2.

⁷³ *Id.*

⁷⁴ CUB/123 Wochele-Jenks/3.

⁷⁵ **CUB/129 Wochele-Jenks/Excel spreadsheet Tab 1.**

1 other disconnected for ~~78~~ 79 days.⁷⁶ Additionally, there were 35 households who have not
2 yet been reconnected.⁷⁷ We know that at least four of those households did not wish to be
3 reconnected when the Company was able to reach them, and two of these four had moved
4 residences.⁷⁸ For customers who were disconnected for amounts below \$150, they were on
5 pre-existing payment plans which lowers the threshold for disconnection to just \$50,
6 instead of \$150.⁷⁹ Recall that a customer is expected to pay not only their current bill, but
7 a portion of the payment plan on top of that, and once a customer misses two consecutive
8 payments for the payment plan, they are removed from the plan and subject to being shut
9 off by the Company.

10
11 There were at least nine households who were disconnected twice in 2025 and once in
12 2024, and one household who was disconnected three times in 2024 and four times in
13 2025.⁸⁰ There were eight households who were disconnected again since they were
14 wrongfully disconnected in November or December.⁸¹

15 **Q. How many customers were impacted?**

16 A. There were 198 Oregon households impacted by the Company's error and 16 Washington
17 households.⁸² According to the Company's records of those enrolled in the BDP, there were
18 603 people impacted by this error.⁸³

⁷⁶ CUB/129 Wochele-Jenks/Excel spreadsheet Tab 1.

⁷⁷ *Id.*

⁷⁸ CUB/123 Wochele-Jenks/3.

⁷⁹ CUB/129 Wochele-Jenks/Excel spreadsheet Tab 1.

⁸⁰ *Id.*

⁸¹ *Id.*

⁸² CUB/132 Wochele-Jenks/1-2.

⁸³ When enrolling in the Bill Discount Program a family must also self-attest their household size to determine eligibility. CUB asked the Company to disclose the household sizes of the impacted households. *See* CUB/129 Wochele-Jenks/Tab 1.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UG 527

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