

1. CAPO stated in January that 1/6 black households are unbanked, along with 14 percent of Hispanic households. Yet, the OPUC chose to eliminate cash payments at the door. This policy was a last resort for homes trying to avoid disconnection. The policy disproportionately impacts communities of color. Instead of limiting cash access, Oregon should expand cash access in more locations.
 - a. Reverse the earlier ruling that ended cash payments at the door and expand cash access to multiple locations across utility territory
2. The OPUC should expand access to low-income and moderate programs by allowing for ETO and Community Action Agencies to combine incentives. Further, low-income funding programs should be used to replace old and dated heat sources, like bulk fuels, and replace them with cleaner and cheaper sources. There are 20,000 homes in IOU territory using propane or oil as their primary fuel source. We need to get to these homes asap and make sure they have access to cheaper energy.
 - a. Allow ETO to fuel switch using incentives that would move Oregon homes from more expensive bulk fuels
 - b. Expand ETO and the Community Action Agencies ability to combine incentives to maximize value to Oregon ratepayers and underserved communities
 - c. Revisit cost-effective dockets and expand access to communities by allowing for more measures.
3. There should be expanded access to arrears management programs. There should be short term and long term options to reduce the burden of payment. There should also be arrears forgiveness programs that incentivize payments over a period of time.
 - a. Expand access to AMPs
 - b. There should be several AMP plans that customers can choose from.
4. I find it way too early to be discussing a resumption of disconnections. Cases are spiking and we are no longer closer to a full opening, which could be many months ahead. No reopening should be done before phase 3 is in place and there should be a period of time after full reopening to allow for economic conditions to return to normal.
 - a. Wait until there is recovered economic conditions
 - b. Track unemployment measures and tie disconnections to economic markers not arbitrary times or reopening
5. The utility should provide notice via phone, and have made direct contact, to make sure the customer knows every payment option.
 - a. When disconnections resume, the utility should make all efforts for hard contact with a customers – providing the customer with several payment options. There must be a heightened standard for customers not contacted.
6. Expand into rate discount programs.
 - a. This should happen asap. The moratorium should be a useful time to development a suite of options for struggling Oregonians. Let's not waste this time.
7. The rate discount must be meaningful for it to be impactful. I would recommend a tier of 25/35/45 percent of current rates. The administration should use CE and if the customer is in a current low-income program then they should be automatically enrolled.
 - a. The discounts should be targeted to those that need it most.
8. We need data on arrears immediately. We need to know how many customers are in 30, 60, and past 90 days delinquent. We need detailed, monthly reporting.
 - a. Reporting needs to happen immediately. It is not fair to have hearings where advocates are expected to comment on reopening without detailed reporting.

