

The Community Action Partnership  
COVID 19 Impact  
Workshop #2

1) Extend the Moratorium

In the last COVID-impacts workshop, stakeholders and utilities were asked when the appropriate time would be to reopen utility service disconnections. General agreement amongst the utilities was that Fall should be when service disconnections resume. As CAPO stated in the workshop, since the time of the quarantine-induced closing, the health and economic outlooks are worse. Oregon's neighboring state of California has signed a moratorium extending into 2021 because of these worsening outlooks. Additionally, states like Massachusetts have signed moratoriums that extend well into the fall and winter of next year, allowing for winter moratoriums to provide relief into Spring 2021. There should be no more discussions about resuming disconnections. It would be useful for the commission to order a suspension of disconnections into next year. Then regulators, advocates, and utilities can make use of the time to coordinate new arrearage and payment programs.

Oregon should not tolerate disconnections of utility service. Uninterrupted access to utility service is essential to daily life. We must ensure the safety and well-being of medically and economically vulnerable populations. The current approach to the provision of utility service far too often permits disconnections because of the inability to afford utility bills. This punitive approach to disconnections ignores the societal inequities that have created economic disparities and higher and disproportionate levels of disconnection in communities of color, and unjustly punishes people for being economically disadvantaged. Available data indicates that utility service disconnections disproportionately harm people of color.

2) Data

Utility disconnection rates, payment plan/deferred payment arrangement activity, and other billing and collection data points, tracked by zip code, should be publicly filed regularly (monthly) to the commission so that stakeholders and regulators can monitor how consumers are faring under a utility's consumer protection policies. We are not asking for a one-time display. The data needs to be consistent and ongoing. Stakeholders need to know not only last month's arrears information but upcoming months as the economic conditions likely worsen from the impact of Covid-19.

3) Debt Policy and Programs

When customers experience a sudden loss of income or unexpected expenses that impact their ability to pay for monthly utility service and other life essentials, they should not be forced to choose between paying a utility bill and affording rent, food, medicine, and other essentials. For this reason, the cost of utility service should be based on a customer's income and ability to pay. Percentage of income payment plans and/or tiered discount rates – that include arrearage forgiveness for consistent monthly payment – must be universally available in Oregon. If we fail to put these programs in place during the moratorium, then we have failed to use the moratorium

as a period to plan and execute programs that save Oregonians from harshening economic conditions brought upon by the pandemic.

When customers fall behind on monthly utility bills, their participation in PIPP programs, Arrearage Management Programs (AMPS) and payment plans/deferred payment arrangements (DPAs), should not be automatically terminated due to late payment. Customers should be allowed to seek reinstatement under reasonable rules that reflect the customer's ability to pay. Oregon utilities must do their part to comply with the regulatory compact that provides them with monopoly franchises in exchange for serving *all customers* within that service territory. Policies that lead to disconnection for customers who cannot afford to pay are inconsistent with that regulatory bargain. The cost of ensuring all residential customers can remain connected to utility service should be socialized among *all* rate classes, including commercial and industrial rate classes. Universal contribution to utility service cost recovery recognizes the societal benefit that follows universal access to utility service.

In Oregon, the commission has yet to develop a COVID-related debt relief program. However, in Texas, there is the electricity relief program, which is designed as short-term assistance, a way for Texans to get back on their feet while much of the Texas economy is closed. The program reimburses the energy portion of power bills at 4 cents per kilowatt-hour and covers the cost of local delivery and transmission, which is another 4 cents per kilowatt-hour. Consumers will be credited for those amounts on their bills yet would still be responsible for reimbursing their power providers for any energy portion of a bill that exceeds 4 cents per kilowatt-hour.

If Texas can find a way to help their most vulnerable, CAPO begs that Oregon do the same. We need immediate relief in financially distressed homes. Open a docket to review adjacent state programs that provide KW/H assistance, otherwise known as a PIPP or rate discounts. It is these programs that will build a foundation of consistent service in our most vulnerable communities. Additionally, late fees, which disproportionately penalize low-income customers and increasingly comprise a punitive profit source for utilities, should be eliminated. These place an undue burden onto homes struggling with payment. We need to relieve economic burdens, not create them.