



**Jessica Vega Pederson**  
Multnomah County Commissioner

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August 26, 2020

Michael Dougherty  
Chief Operating Officer  
Public Utility Commission of Oregon  
201 High St. SE, Suite 100  
Salem, Oregon 97301-3398

Re: OPUC Process on COVID-19 Impacts to Utility Customers

Dear Mr. Dougherty,

I would like to first express my appreciation to the Oregon Public Utility Commission (“OPUC”) for establishing this process to understand and act on the impacts of COVID-19 and the current economic downturn on utility customers. I understand that the OPUC and your staff have appropriately prioritized this process and have acted with full awareness of the importance of minimizing the human cost that utility service disconnections and less flexible arrears repayment arrangements could have. I thank you for that approach.

As highlighted by my colleague and Chair of the Multnomah County Board of Commissioners, Deborah Kafoury, at Multnomah County we have witnessed how COVID-19 has worsened outcomes for our more vulnerable communities. Our Black, Indigenous, and other People of Color (“BIPOC”) communities have been disproportionately affected by the virus and by the economic downturn, and our low-income communities have seen drastic job losses as a result of the pandemic.<sup>1</sup>

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<sup>1</sup> Washington Post, *The recession is over for the rich, but the working class is far from recovered* (Aug. 13, 2020), <https://www.washingtonpost.com/business/2020/08/13/recession-is-over-rich-working-class-is-far-recovered/>; Multnomah County, *New numbers show COVID-19 damage to communities of color; leaders call for better data collection* (May 1, 2020), <https://multco.us/novel-coronavirus-covid-19/news/new-numbers-show-covid-19-damage-communities-color-leaders-call>; Pew Research Center, *Financial and health impacts of COVID-19 vary widely by race and ethnicity* (May 5, 2020) <https://www.pewresearch.org/fact-tank/2020/05/05/financial-and-health-impacts-of-covid-19-vary-widely-by-race-and-ethnicity/>.

With that in mind, I am concerned that the risk of disconnection and the hardship associated with growing utility debt may further hurt our most vulnerable communities at a time when the health and economic crises have worsened conditions and sometimes even trauma for those communities. As long as this pandemic is a concern, our most vulnerable community members will need to be home more than usual in order to decrease their risk of contracting COVID-19. As a result, protecting their access to utility services is imperative.

Such serious and unusual circumstances warrant an approach of a similar magnitude. For that reason, I join those calling for the OPUC to adopt an approach that offers the greatest protection possible to our community, and see the Citizens' Utility Board of Oregon ("CUB") proposal as the appropriate starting point for any discussion of what our community needs to withstand this time of crisis. CUB's proposal appropriately dedicates significant attention to energy assistance and to repayment programs that I understand are significantly more flexible than current repayment options. Given the magnitude of the debt that many of our community members are accruing, and the potential for their workplace to close periodically due to the pandemic,<sup>2</sup> that flexibility seems especially important. I also agree with Chair Kafoury that a longer moratorium on disconnections that CUB proposes is appropriate and that, before disconnections resume, the OPUC should convene stakeholders to determine whether ending the moratorium is reasonable.

Access to utility services is important in the best of times, but in a pandemic, it is vital. Without electricity, children will not be able to learn at home, families will not be able to safely store perishable food, and the elderly may lack access to cooling or heating. The impacts of losing access to utility services are dire and are well documented, so are the extent to which our vulnerable community members must often go to secure those services.<sup>3</sup>

In these unprecedented times, I encourage you to take steps to offer those communities as much protection as possible.

Respectfully submitted this 26<sup>th</sup> of August, 2020,



Jessica Vega Pederson  
Multnomah County Commissioner, District 3

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<sup>2</sup> For example, businesses in the service or hospitality sector may be at risk of closures if a county moves back in the reopening phases.

<sup>3</sup> National Association for the Advancement of Colored People, *Lights Out in the Cold: Reforming Utility Shut-Off Policies as If Human Rights Matter* (Mar. 2017), [https://naacp.org/wp-content/uploads/2020/07/Lights-Out-in-the-Cold\\_NAACP-ECJP-4.pdf](https://naacp.org/wp-content/uploads/2020/07/Lights-Out-in-the-Cold_NAACP-ECJP-4.pdf).