

August 11, 2021

Deborah Kafoury  
Chair  
Multnomah County Chair

Nikita Daryanani  
Climate and Energy Policy Manager  
Coalition of Communities of Color

Bob Jenks  
Executive Director  
Citizens Utility Board

Ethan Krikham  
Advocate

Alma Pinto  
Climate Justice Associate  
Community Energy Project

Alessandra de la Torre  
Energy Justice Organizer  
Rogue Climate

Oriana Magnera  
Energy, Climate, and Transportation  
Manager  
Verde

Lauren McCloy  
Policy Director  
NW Energy Coalition

Damon Motz-Storey  
Healthy Climate Program Director  
Oregon Physicians for Social Responsibility

**Re: Utility disconnections and the upcoming heatwave**

Dear All:

Portland General Electric Company (“PGE”), Pacific Power, and Idaho Power Company (“Idaho Power”), herein collectively referred to as “the utilities,” have received your letter dated August 9, 2021. The utilities appreciate and share concerns raised by the signatory organizations regarding the health and safety of Oregonians during severe weather events. As providers of a necessary and critical service, we are committed to helping Oregonians make it safely through the upcoming high heat weather advisory.

Your letter requests the utilities reconnect previously disconnected customers and limit disconnections during the high heat weather advisory. As required by Oregon Administrative Rule 860-021-0407, the utilities will not perform disconnections for non-payment during high heat weather advisories.<sup>1</sup>

Order No. 21-236 of the Public Utility Commission of Oregon (“Commission”) also requires that utilities not perform disconnections for any residential or small commercial customer on days where the Air Quality Index is at 101 or higher.

---

<sup>1</sup> Oregon Administrative Rule 860-021-0407 requires that “an electric utility must put into effect a moratorium on the disconnection of residential service for nonpayment on any day a local Heat Advisory is issued by the applicable weather reporting service.”

In addition to the protections provided under administrative rule and Commission mandate, each utility offers the following protections in each of their respective service areas:

## **PGE**

The safety of our customers is a top concern. PGE will not disconnect residential customers during this heat related event. Note that as PGE has resumed sending 15-day disconnection notices in late July and no residential customer is currently forecast to be disconnected before August 18<sup>th</sup>. PGE has a history of suspending disconnections in conformance with Division 21 requirements and has historically gone above and beyond to suspend disconnections during large storms and other events. We've taken that approach, consistent with our values to keep customers connected, and in recognition that some circumstances can make disconnections particularly harmful to customers. We agree that a significant heat event in the greater Portland metropolitan area exposes our customers, particularly our most vulnerable customers to dangerous conditions and unfortunately, many of those customers do not have access to air conditioning. During these times, we stay closely connected with state and local agencies to stay up-to-date on information about cooling shelters and other tools to make sure we can support our customer with information they need.

## **Pacific Power**

Pacific Power's mission is to provide safe, reliable and affordable power to our customers and communities. Pacific Power has contracted with a meteorologist to work with our Emergency Management teams to provide daily briefings on fire and other weather-related threats including wind, thunderstorms/lightning, excessive heat and heavy rains/flooding. Local management reviews the threat warnings and relies on local advisories and resources to determine if collection activity should be voluntarily suspended. Pacific Power will often suspend disconnections without a specific advisory in the event the weather forecast still calls for severe temperatures or other weather-related concerns. During periods of high heat, and consistent with existing regulations, Pacific Power does not disconnect residential customers for non-payment. In addition, Pacific Power has cancelled maintenance that would require temporary disconnection of power during the forecasted high heat event. Pacific Power also has programs in place to provide bill assistance to customers who are having trouble paying their bill. Disconnection of power is a last resort and Pacific Power is committed to working with our customers to avoid disconnections during extreme weather events and beyond.

## **Idaho Power**

Idaho Power is committed to the safety of its employees, customers, and the communities it serves. To comply with the administrative rule, Idaho Power utilizes the Boise, Idaho National Weather Service reporting location to determine whether a heat advisory has been issued. In the event of a heat advisory, all field collection activity is suspended. It is not unusual for Idaho Power's service area to have temperatures that exceed 100 degrees on consecutive days, however the field will voluntarily suspend field collection activity, in the absence of a heat advisory, if the temperatures are expected to be excessive (i.e., if they are expected to exceed 105 degrees on three consecutive days or 110 degrees on a single day). The Company often voluntarily suspends collection activity when other heat warnings are issued (e.g., an excessive heat warning can be issued on a day when temperatures are not expected to exceed 100 degrees).

August 11, 2021

Page 3 of 3


The utilities place the health and safety of their customers among the highest of priorities. Current Oregon regulations, along with additional disconnection safety measures applied by the utilities, ensures that customers' electric service remains connected during severe weather events. While the utilities share the safety concerns raised by the signatory organizations, the proposed statewide moratorium would only serve to duplicate safety practices already in place.

Sincerely,

*/s/ Jay Tinker*

---

Jay Tinker, Director, Regulatory Operations  
Portland General Electric Company



---

Etta Lockey, Vice President, Regulation,  
Customer & Community Solutions  
Pacific Power



---

Tim Tatum, Vice President of Regulatory Affairs  
Idaho Power Company

cc:

Ms. Maria Pope  
Portland General Electric  
[maria.pope@pgn.com](mailto:maria.pope@pgn.com)

Ms. Megan Decker  
Chair  
Public Utility Commission of Oregon  
[megan.decker@state.or.us](mailto:megan.decker@state.or.us)

Mr. Stefan Bird  
Pacific Power  
[stefan.bird@pacificorp.com](mailto:stefan.bird@pacificorp.com)

Mr. Michael Dougherty  
Chief Operating Officer  
Public Utility Commission of Oregon  
[Michael.dougherty@puc.oregon.gov](mailto:Michael.dougherty@puc.oregon.gov)

Ms. Lisa Grow  
Idaho Power  
[LGrow@idahopower.com](mailto:LGrow@idahopower.com)

Connie Aschenbrenner  
Rate Design Senior Manager  
Idaho Power  
[CAaschenbrenner@idahopower.com](mailto:CAaschenbrenner@idahopower.com)