

Oregon PUC Commission Utility Disconnection Data

A Case Study

Presented at NARUC

November 17, 2019

Introduction

- Oregon began shut-off data collection in August 2018
- Current effort of NARUC Committee on Consumers and the Public Interest
- History of Oregon Rules
- Adopted Oregon Administrative Rules
- Data Examples
- Use of Data - Panel Discussion

History

- April 2013 - Jackson County Fuel Committee presents petitions to the Commission from 1,400 Southern Oregon residents.



History

- April 2013 -These petitions asked for:
 - Repeal of rate increases granted to the local utility which had been granted in late 2010 (effective 2011), and enact a moratorium on all future utility rate hikes.
 - Enact a winter or year-round moratorium on energy utility disconnects for households at or below 200% of the federal poverty level, or prohibit disconnections for the inability to pay.
 - Provide that customers meeting these income guidelines who are disconnected prior to or after a moratorium period be granted a waiver of reconnect fees.
 - Requests that utilities be required to make reasonable payment plan accommodations for low-income customers and those suffering job loss or foreclosure.

History

- The Commissioners directed staff to examine the petitioners requests and to report back (UM 1650).
- April 2014 - Staff report to the Commission, recommends no action on the petitioners requests primarily due to legal restraints. Docket closed without action, but the Commissioners ask staff to take a closer look at 5 related questions:
 1. Should utilities report to the Commission, on a periodic basis, how many service disconnects they perform each year?
 2. Should the current voluntary practice of stopping disconnects (by some utilities) during severe weather be formalized by a rule making?
 3. Should there be a higher threshold set before disconnection of low-income, elderly, and medical certificate holders?
 4. Are the current requirements to have service reconnected too high a hurdle for many customers?
 5. What states offer Lifeline rates to customers?

History

- Consumer Services Staff conducted extensive research examining the practices of other states related to the 5 questions.
- January 2015, Staff presents report entitled “Low Income Issues Report to the Commission”
 - Researched administrative rules of all 50 states
 - Received responses to data requests from 30 states
 - Received valuable input from Citizens Utility Board of Oregon and Community Action Partnership of Oregon
 - Received input from 6 investor owned utilities serving Oregon

History

Relating to the 5 issues examined, PUC staff recommended the Commission move forward with:

- ✓ A rulemaking requiring utilities to file periodic reports on disconnections and reconnections (AR 602)

AND

- ✓ Implementing a Severe Weather Moratorium on disconnects (AR 601)

The Commission approved these recommendations

History - AR 602 Disconnect Reporting

- Staff sent multiple information requests to all stakeholders seeking data and input about disconnect reporting.
 - Queried all 50 states asking about whether or not they required disconnect/reconnect reporting.
 - 17 States responded that they require some sort of reporting, some quarterly, some monthly, some annually, some voluntary.
 - Received input from consumer advocacy organizations CUB and CAPO
 - Received feedback from all 6 investor owned utilities serving Oregon

History - AR 602 Possible Data Points

After careful review of all stakeholder input, staff developed the following list of possible data points for a report:

- Number of final notices issued
- Accounts disconnected for non-payment
- Final notices issued to med cert holders
- Disconnections of med cert holders
- Final notice issued for unpaid deposit
- Disconnects due to unpaid deposit
- Final notices issued to LIHEAP/OEAP recipients
- Disconnections of LIHEAP/OEAP recipients
- Disconnects due to broken payment arrangements
- Reconnects the same day as the disconnect (day 0)
- Reconnects the next day from disconnect (day 1)
- Reconnects day 2 through 7
- Reconnects more than 7 days
- Total residential accounts 60 days in arrears

History - AR 602 Define Terms

- In addition to these possible data points, staff wished to discuss several issues the stakeholders had raised, including:
 - Discussion/clarification of the value of disconnect reporting
 - Develop a definition of each data point to be reported on.
 - Define what LIHEAP or Energy Assistance recipient means for purposes of our rule.
 - When defining what a LIHEAP or Energy Assistance customer is, should it include all EA funding sources or just rate payer funded EA?
 - Should monthly reports for some data be required, annual reporting for others?
 - Which data points should be reported monthly, which annually?
 - Can CAPO or HCS move funds from one CAP agency to another based on need as suggested?
 - Should reporting be by ZIP code or by more general geographic bounds?
 - If a monthly report is required, what should the due date be?

History - AR 602 Workshop

The workshop was held in July 2017. Stakeholders generally agreed upon the following data points (not unanimous):

1. Number of residential accounts
2. Number of involuntary disconnections
3. Percentage of residential disconnections
4. Disconnections of energy assistance recipients
5. Disconnections of Med Cert holders
6. Number of reconnections same day or next day (days 0-1)
7. Number of reconnections days 2-7
8. Number of reconnections over 7 days

Rule Summary

- Reporting will be on a quarterly basis
- Commission did not specify a report format, only the data points which must be included
- Utility may report by Zip Code or Operating Area. If a utility reports by Operating Area, the Commission may request a breakdown to the Zip Code level within 12 months of a report being filed
- Reporting focused on Disconnection and Reconnection reporting
- Requires specific reporting of Low-Income and Med Cert disconnections

Rule

OAR 860-021-0408 Disconnect Reporting Rule

(1) As used in this rule:

- (a) "Energy assistance recipient" means a residential customer who has received bill payment assistance with an energy bill from any federal, state, ratepayer-funded, or utility supported bill payment assistance fund or program at least once within the past 12 months.
- (b) "Companywide" means the geographic area served by a particular energy utility within the state of Oregon.
- (c) "Local service area" means a smaller geographic unit within an energy utility's companywide service area, such as zip code, city, county, or other similar unit.

(2) Each energy utility must file a quarterly report with the Commission detailing the number of residential disconnections for non-payment and subsequent reconnections as prescribed in this rule. An electronic report must be filed in a text-searchable Microsoft Word, Microsoft Excel, or .pdf (Adobe Acrobat) format.

- (a) For quarterly reporting purposes, the following four time periods apply: February 1 to April 30, May 1 to July 31, August 1 to October 31, and November 1 to January 31.
- (b) Each energy utility must file its initial quarterly report following the first full quarter after the effective date of this rule, unless an alternative initial reporting date is set for the utility by the Commission's Consumer Services Section.
- (c) The energy utility must file a quarterly report as required under this rule within 20 days of the end of each reporting period.

Rule

(3) The quarterly report must provide the following information for each month within the quarter for an energy utility's residential accounts:

- (a) On a companywide basis:
 - (A) Number of active residential accounts;
 - (B) Number of service disconnections for non-payment;
 - (C) Percentage of accounts with service disconnections for non-payment;
 - (D) Number of service disconnections for non-payment on energy assistance recipient accounts;
 - (E) Number of service disconnections for non-payment on medical certificate holder accounts;
 - (F) Number of service disconnections reported under both paragraph (D) and paragraph (E) above, i.e., disconnections for non-payment on medical certificate holder accounts that are also energy assistance recipient accounts;
 - (G) Number of service reconnections following a disconnection for non-payment on the same day or next calendar day following disconnection (Days 0-1); and
 - (H) Number of service reconnections following a disconnection for non-payment that occur more than one day and within 7 calendar days following disconnection (Days 2-7).

Rule

- (b) For each local service area within the companywide area used for reporting:
 - (A) Number of active residential accounts;
 - (B) Number of service disconnections for non-payment;
 - (C) Number of service disconnections for non-payment on energy assistance recipient accounts;
 - (D) Number of service disconnections for non-payment on emergency medical certificate holder accounts;
 - (E) Number of service disconnections reported under both paragraph (C) and paragraph (D) above, i.e., disconnections for non-payment on medical certificate holder accounts that are also energy assistance recipient accounts; and
 - (F) Number of days on which the energy utility was required to impose a moratorium on service disconnection for severe weather per OAR 860-021-0407.
- (c) Zip codes must be used to identify a local service area unless a different unit is pre-approved by the Commission's Consumer Services Section for a utility's use in its reporting under this rule.
- (4) Upon request of the Commission's Consumer Services Section, when made within one year of the date a quarterly report is filed with the Commission, the energy utility must provide a breakdown by zip code of the of service disconnection data reported under section (3) of this rule.

Data Point Summary

1. Active Residential Accounts
2. Service Disconnects For Non-Pay
3. Percent of accounts with service disconnections for non-payment
4. Service Disconnects of customers receiving Energy Assistance
5. Service Disconnects of customers with Medical Certificates
6. Service Disconnects with Energy Asst & also Medical Certificates
7. Service Reconnect Same Day or Next Day
8. Service Reconnect Day 2-7
9. Number of days a severe weather moratorium was in place

Disconnect Reporting May 2019

YEAR	MONTH	ZIP_CD	Active Residential Accounts	Service Disconnects For Non Pay	Percent of Service Disconnects	Service Disconnects with Energy Assistance	Service Disconnects with Medical Certificates	Service Disconnects Energy Asst & also Medical Certificates	Service Reconnect Same Day or Next Day	Service Reconnect Day 2-7	Number of Days for Severe Weather Moratorium
2019	5	97701	9880	27	.27	2			10	5	0
2019	5	97702	12603	12	.10				5	3	0
2019	5	97703	8790	9	.10	1			3	2	0
2019	5	97707	3651								0
2019	5	97731	25								0
2019	5	97733	69	3	4.35						0
2019	5	97737	122								0
2019	5	97739	247	1	.40						0
2019	5	97741	1233	3	.24				2		0
2019	5	97753	276								0
2019	5	97754	2587	3	.12						0
2019	5	97756	7783	12	.15	1			2	2	0
2019	5	97801	4802	5	.10				1		0
2019	5	97813	340	1	.29						0
2019	5	97814	3367	13	.39	2			2		0
2019	5	97818	214	1	.47						0
2019	5	97826	21								0
2019	5	97838	3866	16	.41					2	0
2019	5	97844	179	2	.12						0
2019	5	97862	237								0
2019	5	97868	459								0
2019	5	97875	320	1	.31						0
2019	5	97882	804	4	.5				1		0
2019	5	97886	181								0
2019	5	97907	131	2	1.53						0
2019	5	97913	743	5	.67						0
2019	5	97914	2655	4	.15				1		0
2019	5	97918	408	1	.25						0
Total			65993	125	.19	6			27	14	

State of Oregon Disconnection Tracking Report - May 2019

Number of Accounts **	Disconnects	% Disconnects	Low Income* Disconnects	Med Disconnects	L.I. & Med Disconnects	Reconnects (Days 0-1)	Reconnects (Days 2-7)
535,515	2,024	0.38%	47	4	4	1,437	128
County Name	Number of Accounts ^2	Disconnects	% Disconnects	Low Income* Disconnects	Med Disconnects	L.I. & Med Disconnects	Moratorium Days
BENTON	31,195	88	0.28%	1	0	0	0
CLATSOP	21,518	54	0.25%	0	0	0	0
COOS	23,061	114	0.49%	2	0	0	0
CROOK	7,482	14	0.19%	1	0	0	0
DESCHUTES	55,658	38	0.07%	0	0	0	0
DOUGLAS	38,641	195	0.50%	6	0	0	0
GILLIAM	398	0	0.00%	0	0	0	0
HOOD RIVER	6,516	16	0.25%	0	0	0	0
JACKSON	86,060	482	0.56%	20	1	1	0
JEFFERSON	8,560	28	0.33%	1	0	0	0
JOSEPHINE	39,196	196	0.50%	5	0	0	0
KLAMATH	31,069	159	0.51%	0	1	1	0
LAKE	1,868	22	1.18%	0	0	0	0
LANE	7,181	44	0.61%	0	0	0	0
LINCOLN	10,854	33	0.30%	1	0	0	0
LINN	45,965	203	0.44%	9	0	0	0
MARION	11,210	67	0.60%	0	1	1	0
MORROW	24	0	0.00%	0	0	0	0
MULTNOMAH	74,755	90	0.12%	1	0	0	0
POLK	13,625	70	0.51%	0	0	0	0
SHERMAN	689	1	0.15%	0	0	0	0
TILLAMOOK	91	0	0.00%	0	0	0	0
UMATILLA	15,139	97	0.64%	0	0	0	0
WALLOWA	4,144	12	0.29%	0	1	1	0
WASCO	616	1	0.16%	0	0	0	0

Next Step...

- Panel Discussion about what can we do with the data to reduce disconnections.
- Panelists:
 - ✓ Bob Jenks - Citizens Utility Board of Oregon
 - ✓ Bill Malcom - AARP
 - ✓ Linda Gervais Falkner- Avista Utilities
 - ✓ Charlene Ketchum - Missouri Commission Staff