

November 17, 2025

Chair Letha Tawney  
Commissioner Les Perkins  
Commissioner Karin Power  
Oregon Public Utility Commission  
201 High St. SE, Suite 100  
Salem, Oregon 97301

*Re: AR 671 Rulemaking Regarding Customer Protections/UM 2211 Implementation of House Bill 2475*

Chair Tawney, Commissioner Perkins, and Commissioner Power:

We write to request your consideration and action in the face of converging crises impacting our entire state – crises we worry will increase the likelihood of utility disconnection for our most vulnerable neighbors. This moment demands action from all of us with decision making power to mitigate the impact of federal actions in Multnomah County, and communities across the state.

Last week brought some relief: the end to the longest federal government shutdown in history; the reinstatement of SNAP benefits for the thousands of Oregonians who depend on them; and a degree more certainty for countless other critical federal programs. However, this relief is tempered by the significant impacts we know community members continue to experience, particularly those individuals and families navigating the fear of deportation or the financial implications and trauma of losing a family member to immigration enforcement.

As we move into winter, the risk of harm for families losing their electricity or heat will grow. We applaud the action that utilities have committed to in temporarily suspending service disconnections for certain qualified customers through the end of this year, **and we strongly support proposals to extend these protections to more customers and through all of the coldest months of the year.**

Most programs and protections in place are designed to serve low-income families that have already enrolled in utility assistance programs, leaving families like those impacted by the government shut down, or those newly-ineligible for federal safety

net programs, unprotected. Similarly, rules and programs intended to reduce disconnections have not been designed to deal with the loss of income associated with the fear or realities of immigration enforcement.

A coalition of climate, environmental, consumer justice advocacy organizations have proposed that PUC:

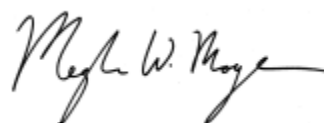
1. Immediately institute an emergency winter moratorium on disconnections through at least April 1, 2026 or 45 days after Oregon receives LIHEAP funds, whichever comes later; and
2. Extend Time Payment Arrangements (TPAs) from 12-months to at least 24-months for residential arrears incurred from now through the temporary moratorium.

We support these actions, and request that you consider them. We also support their proposed changes to the draft rules under consideration in this rulemaking. Multnomah County's Office of Sustainability and Department of County Human Services have thoughtfully engaged with this coalition throughout this rulemaking and we encourage you to adopt their proposed changes.

Respectfully,  
Multnomah County Board of Commissioners



Jessica Vega Pederson  
Chair



Meghan Moyer  
Commissioner, District 1



Shannon Singleton  
Commissioner, District 2



Julia Brim-Edwards  
Commissioner, District 3



Vince Jones-Dixon,  
Commissioner, District 4