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June 22, 2017

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Attention: Filing Center  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97308-1088

**RE: UM 1614 - NW Natural's Request for Extension of Waiver**

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), submits the enclosed application requesting the Commission to grant the Company an extension of the waiver from OAR 860-021-0326(1).

If you have questions, please call Gail Hammer at (503)226-4211, extension 5865.

Sincerely,

*/s/ Mark R. Thompson*

Mark R. Thompson  
Director of Regulatory Affairs

Enclosure

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 1614**

4 In the Matter of

5 NORTHWEST NATURAL GAS COMPANY,  
6 dba NW Natural,

7  
8 For Motion for Extension of Waiver  
9 From OAR 860-021-0326(1) Disconnection of  
10 Gas or Electric Service to Tenants

**MOTION FOR EXTENSION  
OF WAIVER**

11  
12  
13 **I. INTRODUCTION**

14 Pursuant to OAR 860-021-0005, Northwest Natural Gas Company, dba NW Natural  
15 (“NW Natural” or “Company”), requests that the Commission extend the waiver from  
16 compliance to OAR 860-021-0326(1), which requires that utilities send duplicate five-day  
17 disconnection notices to tenants when the customer of record does not reside at the service  
18 address, that was granted to the Company by Commission Order 14-235.

19 **II. DISCUSSION**

20 NW Natural filed a Motion for Waiver from OAR 860-021-0326(1) on June 29, 2012.  
21 In Order No. 14-235, the Commission approved NW Natural’s request for waiver until June  
22 24, 2017 or until OAR 860-021-0326(1) is amended, whichever comes first. The Company  
23 is now requesting an extension of the waiver as OAR 860-021-0326(1) has not yet been  
24 amended.

25 The position of the Company as described in its original June 29, 2012 motion has  
26 not changed. The Company understands this rule will be reviewed in the near future and  
27 does not plan to send duplicate notifications to each residential account that has a billing  
28 address that differs from the service address or perform a one-time review of the residential  
29 accounts with different billing addresses as the process would be cost prohibitive.

1 However, since the initial waiver was granted, the Company has fulfilled the changes  
2 necessary to comply with the broader interpretation of OAR 860-021-0326(1) on a forward  
3 going basis as follows:

- 4 • The Company programmed its Customer Information System (“CIS”) to include a  
5 field for tracking accounts where the customer-of-record’s billing address differs  
6 from the service address and the customer has indicated that the service  
7 address is tenant occupied.
- 8 • The Company made modifications to CIS to ensure that duplicate five-day  
9 disconnect notices will be sent to these flagged accounts when appropriate.
- 10 • And, the Company’s Customer Service Representatives (CSRs) were trained to  
11 ask if a residence is tenant-occupied when the applicant requests a billing  
12 address that is different than the service address.

13 **III. REQUEST FOR WAIVER**

14 Pursuant to OAR 860-021-0005 and for the reasons explained above, NW Natural  
15 requests that the waiver from compliance to OAR 860-021-0326(1), as granted to the  
16 Company by Commission Order 14-235, be extended.

17 DATED this 22<sup>nd</sup> day of June 2017

18 Respectfully submitted

19 */s/ Mark R. Thompson*

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