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December 23, 2020

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Post Office Box 1088
Salem, Oregon 97308

Re: UM 1631 – NW Natural’s Motion to Amend Order No. 20-210 Extending the Temporary Waiver of OAR 860-021-0130(2)

Northwest Natural Gas Company, dba NW Natural, encloses for filing with the Public Utility Commission of Oregon (Commission) its Motion to Amend Order No. 20-210 Extending the Temporary Waiver of OAR 860-021-0130(2) related to the right of a customer to be present during a meter test.

On April 7, 2020, NW Natural filed a petition for a temporary waiver of OAR 860-021-0130(2) that was granted on May 5, 2020. On July 6, 2020, the Commission extended the waiver until January 6, 2021. NW Natural is now seeking a further extension of 9 months, through October 6, 2021, due to the potential exposure to the COVID-19 virus for both customers and NW Natural employees.

Please address correspondence on this matter to me, with copies to the following:

eFiling
NW Natural - Rates & Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204
Telephone: (503) 610-7330
Fax: (503) 220-2579
eFiling@nwnatural.com

If you have any questions, please call me at (503) 610-7074.

Respectfully submitted,

/s/ Natasha Siores

Natasha Siores
Manager, Regulatory Compliance
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1631

In the Matter of

NORTHWEST NATURAL GAS
COMPANY dba NW NATURAL

Petition for a Waiver of OAR 860-021-
0130(2)

**MOTION TO AMEND
ORDER NO. 20-210**

1 Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files
2 this motion under the provisions of ORS 756.568 and in accordance with OAR 860-021-
3 0005. Due to the continuing COVID-19 public health emergency, NW Natural requests the
4 Public Utility Commission of Oregon (Commission) amend Order No. 20-210 and extend the
5 temporary waiver of OAR 860-021-0130(2), currently expiring January 6, 2021, for an
6 additional 9 months, until October 6, 2021.

7 OAR 860-021-0130(2) relates to meter tests, specifying that “a customer and/or a
8 designated representative shall have the right to be present at any meter test.” Good cause
9 exists to seek an extended waiver of this rule because of COVID-19. Due to the fluidity of
10 the public health emergency, the Company has been monitoring the situation and has
11 continually evaluated the need to seek a continuance of this waiver.

I. BACKGROUND

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13 On March 8, 2020, Oregon Governor Kate Brown declared a state of emergency due
14 to the public health threat posed by COVID-19. On March 23, 2020, the governor issued
15 Executive Order No. 20-12 to Stay Home, Save Lives, ordering Oregonians to stay at home,
16 and among other things, requiring social distancing measures. On April 7, 2020, NW Natural

1 requested and was granted a waiver of OAR 860-021-0130(2), effective May 6, 2020. On
2 July 6, 2020, the Commission extended the waiver until January 6, 2021. The continuing
3 health emergency supports our request for a continuance of the waiver of OAR 860-021-
4 0130(2). The extension of the waiver will benefit customers and NW Natural employees by
5 limiting potential exposure to COVID-19 through social distancing.

6 **II. GOVERNING AUTHORITY**

7 As mentioned above, OAR 860-021-0130(2) specifies “a customer and/or a
8 designated representative shall have the right to be present at any meter test.” OAR 860-021-
9 0005 allows the Commission to grant waivers of any of the Division 021 rules for good cause
10 shown.

11 **III. COMMUNICATIONS**

12 Communications regarding this petition for waiver should be addressed to:

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Regulatory Attorney (OSB# 201722)
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13 **IV. REQUEST FOR WAIVER EXTENSION**

14 NW Natural seeks a 9-month extension of the waiver of OAR 860-021-0130(2)
15 granted by the Commission in Order No. 20-210. Good cause exists to grant NW Natural’s
16 request for waiver. Extending the waiver benefits customers and NW Natural employees by

1 limiting potential exposure to COVID-19 through social distancing. The Company will
2 continue to pull and test meters as needed, and will send to the customer the results of any
3 meter tests, including those that the customer would have otherwise been permitted to
4 witness. Since NW Natural's current waiver of OAR 860-001-0420(2) expires on January 6,
5 2021, the Company respectfully requests that the Commission promptly consider this motion
6 in order to ensure that the waiver continues without interruption or that any such interruption
7 is as limited as practicable.

8 Date this 23rd day of December, 2020.

9 Respectfully Submitted,

10 NW NATURAL

11 /s/ Ryan Sigurdson

12 Ryan Sigurdson

13 Regulatory Attorney (OSB# 201722)

14 250 SW Taylor Street

15 Portland, Oregon 97204-3038

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