



250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

October 8, 2021

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. 20-501 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. 20-501 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, and on December 30, 2020, the Commission extended the waiver until October 6, 2021. NW Natural is now seeking a further extension of 6 months, through April 6, 2022, 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. 20-501**

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. 20-501 and extend the
5 temporary waiver of OAR 860-021-0130(2), which currently expired October 6, 2021, for an
6 additional 6 months, until April 6, 2022.

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, and on December
3 30, 2020, the Commission extended the waiver until October 6, 2021. The continuing health
4 emergency supports our request for a continuance of the waiver of OAR 860-021-0130(2).
5 The extension of the waiver will benefit customers and NW Natural employees by limiting
6 potential exposure to COVID-19 through social distancing.

7 **II. GOVERNING AUTHORITY**

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

12 **III. COMMUNICATIONS**

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

Ryan Sigurdson
Regulatory Attorney (OSB# 201722)
250 SW Taylor Street
Portland, Oregon 97204-3038
Telephone: (503) 610-7570
Email: ryan.sigurdson@nwnatural.com

Natasha Siores
Manager, Regulatory Compliance
250 SW Taylor Street
Portland, Oregon 97204-3038
Phone: (503) 610-7074
Email: natasha.siores@nwnatural.com

NW Natural
e-Filing for Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204-3038
Telephone: (503) 610-7330
Facsimile: (503) 220-2579
Email: eFiling@nwnatural.com

14 **IV. REQUEST FOR WAIVER EXTENSION**

15 NW Natural seeks a 6-month extension of the waiver of OAR 860-021-0130(2)
16 granted by the Commission in Order No. 20-501. Good cause exists to grant NW Natural’s

1 request for waiver. Extending the waiver benefits customers and NW Natural employees by
2 limiting potential exposure to COVID-19 through social distancing. The Company will
3 continue to pull and test meters as needed, and will send to the customer the results of any
4 meter tests, including those that the customer would have otherwise been permitted to
5 witness. Since NW Natural’s current waiver of OAR 860-001-0420(2) expired on October 6,
6 2021, the Company respectfully requests that the Commission promptly consider this motion
7 in order to ensure that the waiver continues, and that the interruption is as limited as
8 practicable.

9 Date this 8th day of October, 2021.

10 Respectfully Submitted,

11 NW NATURAL

12 /s/ Ryan Sigurdson

13 Ryan Sigurdson

14 Regulatory Attorney (OSB# 201722)

15 250 SW Taylor Street

16 Portland, Oregon 97204-3038

17 Telephone: (503) 610-7570

18 Email: ryan.sigurdson@nwnatural.com

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