



**NW Natural®**

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June 15, 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. 20-138 Extending the Limited Waiver of OAR 860-021-0410(4) – EXPEDITED CONSIDERATION REQUESTED**

Northwest Natural Gas Company, dba NW Natural, encloses for filing with the Public Utility Commission of Oregon (Commission) its Motion to Amend Order No. 20-138 Extending the Limited Waiver of OAR 860-021-0410(4) related to medical certificates, with expedited consideration requested.

On April 7, 2020 NW Natural filed a petition for a limited waiver of OAR 860-021-0410(4) that was granted on April 27, 2020. NW Natural is now seeking an extension of 90 days to its original request through September 19, 2020, due to the financial impacts of some of our customers due to the continuing COVID-19 health crisis.

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 Partial Waiver of OAR 860-  
021-0410(4)

**MOTION TO AMEND  
ORDER NO. 20-138**

***EXPEDITED CONSIDERATION  
REQUESTED***

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. NW Natural requests the Public Utility Commission of Oregon (Commission) amend  
4 Order No. 20-138 and extend the temporary partial waiver of OAR 860-021-0410(4),  
5 currently expiring on June 21, 2020, for an additional 90 days, until September 19, 2020.

6 OAR 860-021-0410(4) relates to Emergency Medical Certificates for Residential  
7 Electric and Gas Service, providing the parameters for the duration of emergency medical  
8 certificates and requiring utilities to provide notice to customers when emergency medical  
9 certificates are due to expire. Good cause exists to seek an extended partial waiver of this  
10 rule due to the continuing COVID-19 public health emergency. Additionally, NW Natural  
11 respectfully requests expedited consideration of this motion consistent with OAR 860-001-  
12 420(6) to ensure that Order No. 20-138 not be allowed to lapse on June 21, 2020.

13 Due to the fluidity of the public health emergency, the Company has been monitoring  
14 the situation and has continually evaluated the need to seek a continuance of the waiver. The  
15 Company made a separate tariff advice filing on April 7, 2020, with the Commission to

1 temporarily change language in its tariff Rule 10 Emergency Medical Certificates –  
2 Residential Customers to be consistent with this waiver request. No change is required to  
3 Rule 10 with this request to amend Order No. 20-138.

#### 4 I. BACKGROUND

5 On March 8, 2020 Oregon Governor Kate Brown declared a state of emergency due  
6 to the public health threat posed by COVID-19. On March 23, 2020, the governor issued  
7 Executive Order No. 20-12 to Stay Home, Save Lives, ordering Oregonians to stay at home,  
8 and among other things, requiring social distancing measures. On April 7, 2020, NW Natural  
9 requested and was granted a partial waiver of OAR 860-021-0410(4), effective  
10 April 21, 2020. The continuing public health emergency caused by COVID-19 and  
11 circumstances resulting from stay-at-home and social distancing measures are likely causing  
12 a burden for utility customers that need to renew their emergency medical certificates.

13 OAR 860-021-0410(4) states:

14 (4) An emergency medical certificate shall be valid only for the  
15 length of time the health endangerment is certified to exist, but  
16 no longer than six months without renewal for certificates not  
17 specifying chronic illnesses and no longer than twelve months  
18 for certificates specifying illnesses identified as chronic by a  
19 “Qualified Medical Professional” as defined in this rule. At  
20 least 15 days before the certificate’s expiration date, an energy  
21 utility will give the customer written notice of the date the  
22 certificate expires unless it is renewed with the utility before  
23 that day arrives.

24 NW Natural’s initial proposal, filed April 7, 2020, proposed to extend the 15-day  
25 renewal timeframe contemplated in OAR 860-021-0410(4) to six months, for a period of 60  
26 days. In Order No. 20-138, the Commission granted the Company’s petition, with the  
27 temporary partial waiver expiring on June 21, 2020. NW Natural is seeking to continue the

1 waiver for an additional 90 days, through September 19, 2020, due to the ongoing economic  
2 and social conditions caused by the COVID-19 public health emergency.

3 **II. GOVERNING AUTHORITY**

4 As mentioned above, OAR 860-021-0410(4) requires utilities to provide a 15-day  
5 renewal period for medical certificates. OAR 860-021-0005 allows the Commission to grant  
6 waivers of any of the Division 021 rules for good cause shown.

7 **III. COMMUNICATIONS**

8 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](mailto:ryan.sigurdson@nwnatural.com)

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NW Natural  
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9 **IV. EXPEDITED CONSIDERATION REQUESTED**

10 NW Naturally respectfully requests expedited consideration of this motion consistent  
11 with the requirements of OAR 860-001-0420 to ensure this motion is considered before the  
12 temporary partial waiver expires on June 21, 2020. In its initial filing for a temporary partial  
13 waiver, Commission Staff recommended that the Commission grant the waiver, and no other  
14 comments or objections were filed. NW Natural has contacted Staff and discussed the nature  
15 of this motion. Staff has represented that they are not taking a position on the motion but

1 will review it upon filing. Given the nature of this motion, NW Natural respectfully requests  
2 to shorten the time for any responses to June 17, 2020, and, if a response is filed, that NW  
3 Natural be permitted to reply by June 18, 2020.

4 **V. REQUEST FOR WAIVER EXTENSION**

5 NW Natural seeks a 90-day extension of the partial waiver of OAR 860-021-0410(4)  
6 granted by the Commission in Order No. 20-138. The partial waiver extends the 15-day  
7 renewal timeframe to six months to provide continued flexibility to customers in renewing  
8 medical certificates during this uncertain time caused by the COVID-19 public health  
9 emergency. Good cause exists to grant NW Natural's request for waiver. Further, customers  
10 will not be harmed by the granting of this waiver.

11 Dated this 15<sup>th</sup> day of June, 2020.

12 Respectfully Submitted,

13 NW NATURAL

14 /s/ Ryan Sigurdson

15 Ryan Sigurdson

16 Regulatory Attorney (OSB# 201722)

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18 Portland, Oregon 97204-3038

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