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June 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. 20-154 Extending the Temporary Waiver of OAR 860-021-0130(2) – 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. 20-154 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. NW Natural is now seeking an extension of 120 days to its original request, through November 2, 2020, 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. 20-154**

***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. Due to the continuing COVID-19 public health emergency, NW Natural requests the  
4 Public Utility Commission of Oregon (Commission) amend Order No. 20-154 and extend the  
5 temporary waiver of OAR 860-021-0130(2), currently expiring July 5, 2020, for an  
6 additional 120 days, until November 2, 2020.

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. Additionally, NW  
10 Natural respectfully requests expedited consideration of this motion consistent with OAR  
11 860-001-420(6) to ensure that Order No. 20-154 does not lapse on July 5, 2020.

12 Due to the fluidity of the public health emergency, the Company has been monitoring  
13 the situation and has continually evaluated the need to seek a continuance of this waiver.

14 **I. BACKGROUND**

15 On March 8, 2020, Oregon Governor Kate Brown declared a state of emergency due  
16 to the public health threat posed by COVID-19. On March 23, 2020, the governor issued

1 Executive Order No. 20-12 to Stay Home, Save Lives, ordering Oregonians to stay at home,  
2 and among other things, requiring social distancing measures. On April 7, 2020, NW Natural  
3 requested and was granted a waiver of OAR 860-021-0130(2), effective May 6, 2020. The  
4 continuing health emergency supports our request for a continuance of the waiver of OAR  
5 860-021-0130(2). The extension of the waiver will benefit customers and NW Natural  
6 employees by limiting 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](mailto: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](mailto: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](mailto:eFiling@nwnatural.com)

## 14 **IV. EXPEDITED CONSIDERATION REQUESTED**

15 NW Natural respectfully requests expedited consideration of this motion consistent  
16 with the requirements of OAR 860-001-0420(2) to ensure this motion is considered before

1 the temporary waiver expires on July 5, 2020. In its initial filing for a temporary waiver,  
2 Commission Staff recommended that the Commission grant the waiver, and no other  
3 comments or objections were filed. NW Natural has contacted Staff and discussed the nature  
4 of this motion. Staff has represented that they are not taking a position on the motion but  
5 will review it upon filing. Given the nature of this motion, NW Natural respectfully requests  
6 to shorten the time for any responses to June 26, 2020, and, if a response is filed, that NW  
7 Natural be permitted to reply by June 30, 2020.

8 **V. REQUEST FOR WAIVER EXTENSION**

9 NW Natural seeks a 120-day extension of the waiver of OAR 860-021-0130(2)  
10 granted by the Commission in Order No. 20-154. Good cause exists to grant NW Natural's  
11 request for waiver. Extending the waiver benefits customers and NW Natural employees by  
12 limiting potential exposure to COVID-19 through social distancing. The Company will  
13 continue to pull and test meters as needed, and will send to the customer the results of any  
14 meter tests, including those that the customer would have otherwise been permitted to  
15 witness.

16 Date this 23<sup>rd</sup> day of June, 2020.

17 Respectfully Submitted,

18 NW NATURAL

19 /s/ Ryan Sigurdson  
20 Ryan Sigurdson  
21 Regulatory Attorney (OSB# 201722)  
22 250 SW Taylor Street  
23 Portland, Oregon 97204-3038  
24 Telephone: (503) 610-7570  
25 Email: [ryan.sigurdson@nwnatural.com](mailto:ryan.sigurdson@nwnatural.com)  
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