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August 22, 2022

Oregon Public Utility Commission  
Attention: Filing Center  
201 High Street S.E., Suite 100  
Salem, OR 97301-3398

**Re: UM 1631 Cascade Natural Gas' Petition for a Reauthorization of a Waiver of OAR 860-021-0405(11)**

Dear Filing Center:

Cascade Natural Gas Corporation, pursuant to the provisions of ORS 756.040 and in accordance with OAR 860-021-0005 encloses for filing its Petition for a Reauthorization of a Waiver of OAR 860-021-0405(11).

If you have any questions concerning this submittal, please contact Lori Blattner at (208) 377-6015.

Sincerely,

*/s/ Lori A. Blattner*

Lori A. Blattner  
Director, Regulatory Affairs  
Cascade Natural Gas Corporation  
8113 W. Grandridge Blvd.  
Kennewick, WA 99336-7166  
[Lori.blattner@intgas.com](mailto:Lori.blattner@intgas.com)

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1631**

In the Matter of  
Cascade Natural Gas Corporation Reauthorization  
Petition for a Waiver of OAR 860-021-0405(11)

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REAUTHORIZATION  
PETITION OF CASCADE NATURAL  
GAS CORPORATION

1 Cascade Natural Gas Corporation (Cascade or Company) files this reauthorization  
2 petition under the provisions of ORS 756.040 and in accordance with OAR 860-021-0005.  
3 Cascade seeks an order from the Public Utility Commission of Oregon (Commission) granting a  
4 waiver of OAR 860-021-0405(11). OAR 860-021-0405(11) requires the utility to accept  
5 reasonable partial payment of the overdue balance from a customer if personal contact is made.  
6 The Company's current practice is to knock on the door while on site for disconnection and  
7 allow for customers to make payment at the door. The Company respectfully requests a  
8 reauthorization of a waiver of OAR 860-021-0405(11) to allow the Company to discontinue  
9 collecting cash payment at the door. The Company was originally granted a waiver on January  
10 28, 2020 for a period of 2 years.

**I. Background**

11  
12 Safety is a top priority for Cascade. The Company continuously reviews its operations  
13 and business practices in order to maintain a safe working environment for all its employees.  
14 Business practices allowing for the risk of injury or death of an employee as a result of  
15 workplace violence must be revised to provide a safer working environment. One of those key  
16 business practices is allowing for the collection of payments in the field when a customer is  
17 scheduled to be disconnected.

1           Field employees who are known to carry money in their vehicle are inherently at risk for  
2 being attacked and robbed as they travel their daily route. The employee also potentially collects  
3 cash payments. These cash payments are then stored in a Company vehicle until they can be  
4 dropped off at a local office or a pay station, and the public can be aware of this fact. This puts  
5 employees at risk for being victims of theft or robbery.

6           The Occupational Safety and Health Administration’s (OSHA) General Duty Clause  
7 requires employers to furnish each employee a place of employment free from recognized  
8 hazards that can be considered harmful to an employee.<sup>1</sup> Multiple governmental agencies have  
9 researched workplace violence and provided useful information and statistics regarding  
10 workplace violence, including identification of factors leading to higher risk of violence to occur.  
11 Such research identified notable risks to employees exchanging money with the public.

12           Removing the requirement to accept cash payment during the personal contact will  
13 significantly reduce the possibility of workplace violence. Further, waiving this requirement will  
14 keep employees from carrying cash payments with them throughout the day. Not collecting this  
15 type of payment in the field reduces the risk that a member of the general public will commit  
16 theft or robbery.

17           Cascade is constantly reviewing the Company’s policies for ways to improve safety for  
18 the Company’s employees. The Company’s intention to stop collecting cash payment at the door  
19 during a collection will not remove all risk, but it is a pro-active approach toward minimizing the  
20 risk and providing a safer workplace. Injuries or death to employees cannot be an accepted cost  
21 of doing business.

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<sup>1</sup> OSHA, General Duty Clause, 5(a)(1)

1 **II. Governing Authority**

2 Commission rules require utility employees to accept payment from customers while  
3 onsite to disconnect service.

4 OAR 860-021-0405(9) provides as follows:

5 The energy utility must make a good-faith effort to personally contact the  
6 customer or an adult at the residence to be disconnected on the day the energy utility  
7 expects to disconnect service or, where the service address has remote disconnection  
8 capability installed, at least three business days prior to the day the energy utility expects  
9 to disconnect service:

10  
11 (a) If contact is made, either in person or via the telephone, the energy utility must  
12 advise the customer or an adult at the residence of the proposed disconnection; or

13 (b) If contact is not made, the energy utility must:

14 (A) Leave a notice in a conspicuous place at the residence informing the customer  
15 that service has been, or is about to be, disconnected.<sup>2</sup>

16  
17 OAR 860-021-0405(11) provides:

18 When the energy utility makes personal contact under this rule, the utility's  
19 representative making contact is empowered to accept reasonable partial payment of the  
20 overdue balance under the time-payment provisions of OAR 860-021-0415.

21  
22 OAR 860-021-0005 allows the Commission to grant waivers of Division 21 rules for  
23 good cause shown.

24 **III. Argument**

25 **A. Granting the Waiver will not Harm Customers because They Receive Multiple**  
26 **Notices Prior to Disconnection**

27 Disconnecting natural gas service for non-payment is always a utility company's  
28 last resort. Cascade already provides customers with multiple notifications of account balances  
29 and potential disconnection of service. Specifically, the Company provides the following before  
30 a site visit to disconnect service:

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<sup>2</sup> OAR 860-021-405(9)(b) also contains a subsection (B) that is not applicable to Cascade Natural Gas Corporation.

1. Monthly billing amount and due date;
2. Automated call provided that an appropriate phone number is available;
3. Past due notice clearly indicating the account is past due, showing the amount due and both a “must be paid by” and “due by date” (same date);
4. Urgent notice indicating the amount due and both a “must be paid by” date and “due by” date (same date);
5. Personal phone call out by a Credit Agent (provided phone information is available) prior to every disconnect.

As illustrated above, this billing and collection process provides customers with five notifications using various communication methods prior to the disconnection visit, giving ample time to arrange for a payment to be made prior to the Company visiting the site.

**B. Cascade Offers Numerous Payment Methods**

Utilities are expanding payment methods beyond the traditional use of U.S. Mail and accepting payments at local offices. Technological advances have allowed customers to utilize newer and more convenient payment methods. Cascade now offers the following payment methods:

1. Automatic Payments: through the customer’s bank - no fee.
2. Online Account Services: Online payment through the Company’s website, available 24 hours a day, seven days a week – no fee.
3. U.S. Mail: cost of a stamp plus the cost of a check or money order.
4. Convenience Pay®: The Company has 16 available pay stations in Oregon. These pay stations are free if done through Western Union® Convenience Pay®.
5. Western Union® Speedpay® Bill Payment Service: by phone or online anytime \$1.99 fee.
6. Pay at time of disconnection visit - \$20.00 fee.

As shown above, the Company offers numerous no-cost or low-cost payment

1 methods for customers. The Company also offers numerous payment options  
2 for increased customer convenience. Online and pay-by-telephone payment options allow  
3 customers to make payment from their own residence, any Internet connection, or through their  
4 mobile phones, and provide almost immediate account updating. While the majority of Cascade  
5 customers choose the no-and low-cost options, other customers have chosen the most expensive  
6 payment option, paying the field collector at the door at the time of disconnection, which  
7 includes a field visit charge of \$20.00.

8 Currently, the Company receives 20.46% of its payments in Oregon via the postal service,  
9 while the remaining payments are made through other means. During 2021, there were 8,683  
10 payments processed by the Company's Convenience Pay® network in the state of Oregon.  
11 Finally, there were 136 payments received in 2021 during a field visit in lieu of a disconnection.

12 Of these 136 payments that were received during a disconnection visit, 28 visits were repeat  
13 visits which means approximately 20.6% were customers who used the service technician  
14 dispatched to perform a disconnection as a field collection agent. Given the number of other  
15 payment options available, however, allowing the Company to discontinue payments in the field  
16 will not harm customers.

#### 17 **IV. Request for Waiver**

18 OAR 860-021-0005 allows the Commission to grant waivers of Division 21 rules  
19 for good cause shown. The Company can no longer support business practices allowing for the  
20 increased risk of injury or death to an employee. Safety is a top priority for the Company. One  
21 way to reduce risk of injury or death is to eliminate the requirement that an employee carry  
22 customer payments made in cash. Removing the requirement to accept cash payment would  
23 reduce the risk to the Company's field employees and eliminate the opportunity for robbery or

1 theft. Ensuring a safe working environment for employees is in the public interest and the  
2 Company's request is consistent with underlying rules and applicable statutes. Cascade  
3 respectfully seeks waiver of the specific provisions of OAR 860-021-0405(11) requiring the  
4 utility to collect cash payment from customers during the site contact. Good cause exists to grant  
5 the Company's request for waiver. Such a waiver would increase the safety of employees  
6 without sacrificing customer service. Further, customers will not be harmed. Customers receive  
7 a variety of notices of balances owed and pending disconnection notices. Finally, customers may  
8 pay bills through various no-or low-cost payment methods.

9  
10 DATED: August 18, 2022

11  
12 Sincerely,

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