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October 12, 2016

**VIA ELECTRONIC FILING**

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

Re: AR 601 Severe Weather Moratorium; NW Natural Comments

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), submits the following comments in response to the Commission Staff’s (“the Staff”) request for interested parties to submit written comments following the workshop held on September 28, 2016 (“the workshop”) in the above-referenced docket.

NW Natural’s comments respond to the seven (7) questions that the Staff presented for discussion at the workshop.

**1. Should the rule allow each utility the discretion to formulate its own plan incorporating minimum standards to be set by rule or should the Commission prescribe the severe weather moratorium standard?**

NW Natural would support a rule that establishes a minimum temperature standard of 32 degrees during the winter months (November through March), which is consistent with the Company’s existing practices. If this minimum standard were adopted in the rule, it is NW Natural’s position that there would be no need to file a description of its severe weather moratorium practices in the tariff.

**2. Should there be different triggers for different geographic areas (e.g., Eastern Oregon vs Western Oregon vs Southern Oregon)?**

It is NW Natural’s position that different standards based on geographic area would not be needed. However, it might be feasible to establish a rule that incorporated different standards based on certain characteristics, e.g. a different minimum standard might apply when the forecast in any geographic area shows sustained periods of temperatures below 32 degrees, than would apply when the forecast shows only one or two days of temperatures below freezing. The Company would be willing to explore this possible approach should it be of interest to other participants.

**3. What are the appropriate winter and summer temperature triggers?**

NW Natural does not have an opinion regarding the summer temperature trigger as it would not pertain to gas utility operations.

As discussed above, it is NW Natural’s position that a minimum temperature trigger of 32 degrees would be appropriate for the day-to-day occurrences of cold weather in our service

territory. However, it may be possible to explore how a rule could be structured to establish a different minimum standard that would apply where there are sustained periods of cold weather.

**4. Discussion of period of time trigger must be met before a moratorium is initiated (e.g., 24 hours, 48 hours).**

NW Natural would support a daily time trigger on a winter moratorium.

**5. How long should the moratorium remain in effect and under what conditions should it end?**

As discussed above, both the time trigger and duration should be applied on a daily basis.

**6. Are there other circumstances under which a moratorium should be put into effect?**

In NW Natural's opinion, there are no other circumstances in which a moratorium might be put into effect that warrant inclusion in an administrative rule. There are occasions where events may cause a utility to place a moratorium on certain activity, but it would be difficult to effectively define these events for purposes of an administrative rule. Rather, each utility should have the discretion to take steps necessary to manage such events in the manner it deems most appropriate.

**7. What will it cost utilities to implement a severe weather moratorium?**

NW Natural would not experience any additional cost if the resulting rule does not materially differ from current practice; specifically if the minimum temperature trigger were set at 32 degrees. We would not be able to provide a cost estimate for implementing a rule that called for material changes in current practice until we know what that change would be.

NW Natural appreciates the opportunity to provide comment in this rulemaking proceeding, and we look forward to working with the parties through the next phase of the process. If you have questions regarding these comments, please feel free to call me at 503.721.2452.

Please address correspondence on this matter to me with copies to:

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Sincerely,

*/s/ Onita R. King*

Onita R. King  
NW Natural, Rates & Regulatory Affairs