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November 22, 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 Informal 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 dated November 9, 2016 for interested parties to submit informal written comments regarding the draft proposed rule provided in the November 9, 2016 communication.

Our comments are broken out by each section of the draft proposed rule, and each section includes suggested edits to the rule language in redline format.

Severe Weather Moratorium on Involuntary Disconnections

Proposed Rule Language:

(1) Except as set forth in section (6) of this rule, an energy utility shall implement a moratorium on the disconnection of residential service when a daily high temperature of less than 32 degrees is forecast by the National Weather Service.

NWN Comments:

- This section should specify that the moratorium applies only to disconnections for non-payment.
- Each utility should be allowed to select a weather reporting service that best fits their process, so the specific reference to the National Weather Service is unnecessary.

NWN Suggested Edits:

(1) Except as set forth in section (6) of this rule, an energy utility ~~shall~~ must implement put into effect a moratorium on the disconnection of residential service for non-payment ~~when on any day that the~~ daily high temperature forecast is ~~of~~ less than 32 degrees. ~~is forecast by the National Weather Service.~~

Proposed Rule Language:

(2) An electric utility shall implement a moratorium on the disconnection of residential service when a local Heat Advisory is issued by the National Weather Service.

NWN Comments:

- No comment; this section does not apply to NW Natural.
- Suggested edits are offered for consistency with changes suggested for section (1).

NWN Suggested Edits:

(2) An electric utility ~~shall must implement put into effect~~ a moratorium on the disconnection of residential service for non-payment when a local Heat Advisory ~~is has been~~ issued by the National Weather Service.

Proposed Rule Language:

(3) An energy utility required to implement a moratorium under section (1) or (2) of this rule shall implement the moratorium for a period not less than 24 hours.

NWN Comments:

- NW Natural supports the 24-hour time period.
- Editorial suggestions to the proposed language are offered below.

NWN Suggested Edits:

(3) Any ~~energy utility required to implement a~~ moratorium activated as a result of under section (1) or section (2) of this rule shall remain in effect ~~implement the moratorium~~ for a period not less than 24 hours.

Proposed Rule Language:

(4) An energy utility shall base the need for a moratorium on data available from the nearest National Weather Service reporting station and need only apply a moratorium to the area covered by that reporting station. The energy utility shall obtain the required forecast data no later than 8:00 a.m. each business day.

NWN Comments:

- Each utility should be allowed to select a weather reporting service that best fits their process, so the specific reference to the National Weather Service should be removed.
- NW Natural supports the application of a moratorium by geographic area.
- NW Natural supports the selection of 8:00 a.m. by which to make a moratorium decision.
- Editorial suggestions to the proposed language are offered below.

NWN Suggested Edits:

(4) An energy utility shall ~~base the need for a moratorium on use weather data reported from a publicly available third party weather reporting service to inform its moratorium decision, data available from the nearest National Weather Service reporting station~~ and need only apply a moratorium to the area (s) that meet the conditions set forth in section (1) or section (2) above. ~~covered by that reporting station.~~ The energy utility shall ~~obtain the required forecast data~~ ~~re~~make its moratorium decision not later than 8:00 a.m. each business day.

Proposed Rule Language:

(5) Each energy utility shall make an initial filing with the Commission to designate a weather reporting station for each locality in the utility's service area, and shall update its designations as necessary with a supplemental filing.

NWN Comments:

- NW Natural assumes that the reference to an “initial filing” means that the utility is expected to submit a revised tariff that sets forth the required information. If this is not the intent, then please provide further information about the proposed filing process.
- The requirement to designate the weather reporting station may be unnecessarily prescriptive. For example, NW Natural uses the publicly available weather reporting service “Weather Underground” which allows us to obtain temperature forecast by zip code. While Weather Underground identifies the weather station associated with that zip code, the reporting agency may change that station identity at any time without notice, and monitoring those changes to ensure the tariff accurately reflects the station identification could be administratively burdensome. As such, the rule should allow for a designation to be something other than the weather reporting station. Please see the suggested edits to the rule language provided below.
- If the rule is clarified that this is a tariff filing, there is no need to state that the utility will need to supplement the filing, as the requirement for a utility to maintain and keep its tariff current is already governed by other administrative rules.

NWN Suggested Edits:

(5) Each energy utility shall specify in its Tariff (i) the weather reporting service it will use in the administration of this rule, (ii) the geographic breakdown of the utility's service area that will be used in the application of this rule, and (iii) the temperature data source for each geographic area identified. ~~for each locality in the utility's service area, and shall update its designations as necessary with a supplemental filing.~~

Proposed Rule Language:

(6) If an energy utility implements a winter protection program under which a household with a child, an elderly person, or a medical certificate holder may voluntarily participate if the customer is unable to pay a utility bill and be protected from service disconnection between

December 15 through March 15 of the calendar year, the requirements of section (1) of this rule shall not apply.

NWN Comments:

- NW Natural supports the inclusion of this option into the rule,
- Editorial suggestions to the proposed language are offered below.

NWN Suggested Edits:

(6) ~~#Section (1) of this rule shall not apply to~~ an energy utility ~~that offers implements a~~ voluntary winter protection program under which a household with a child, an elderly person, or a current medical certificate ~~holder~~ may ~~voluntarily~~ participate ~~if the customer is unable to pay a utility bill~~ and be protected from service disconnection for non-payment between December 15 ~~through~~ and March 15. ~~of the calendar year, the requirements of section (1) of this rule shall not apply.~~

If you have questions regarding these comments, please feel free to call me at 503.721.2452.

Sincerely,

/s/ Onita R. King

Onita R. King
NW Natural
Rates & Regulatory Affairs