

ONITA R. KING
Rates and Regulatory Affairs
Tel: 503.721.2452
Fax: 503.721.2516
email: ork@nwnatural.com



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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 602; Workshop Follow-up Comments

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”) provides the following comments on the list of items issued by Commission Staff following the July 12, 2017 workshop.

1. Usefulness of reported data and sunset clause

NW Natural would support the inclusion of a sunset clause that terminates the reporting obligation after a reasonable period of time, possibly in a 3 to 5 year timeframe. We could also support the inclusion of a provision that would allow the reporting obligation to continue should it then be determined that the reports have been, and will continue to be, used and useful. Any such provision should also give the Commission the option to refine the report elements as needed should it be determined that the reporting obligation would continue.

2. Data confidentiality.

At the workshop there was discussion about the ability for the reports to be protected from public access. NW Natural does have some concern about uninformed third parties taking the reported data out of context and/or using it for inappropriate reasons, but otherwise does not have significant concerns about the confidentiality of the data itself. Should a confidentiality issue arise, the Company would go through the appropriate procedural channels to address that concern.

3. Low-income bill assistance programs.

From the workshop discussion, it was evident that the parties support including data in the report that would identify the number of accounts disconnected that had received bill assistance within the most recent 12-month period. This discussion highlighted the fact that there are a number of private organizations and churches that may from time to time provide bill assistance funds to customers and it was questioned if these small funding resources should be included in the low-income data. It is NW Natural’s suggestion that the report

only include LIHEAP and the utility's tariffed bill assistance program(s). The report should not include funds distributed through private organizations or voluntary contribution programs as these funding sources are not widespread throughout the service territory and represent a very small component of bill assistance funding.

4. Safe harbor/provision.

NW Natural has no objection to incorporating a 'safe harbor' provision into the rule. We see value in the inclusion of a provision within the rule that could be invoked whenever a utility might undergo a Customer Information System ("CIS") replacement or upgrade where the utility's ability to meet its reporting obligation under the rule could be impacted.

At this time, NW Natural anticipates that it could take at least 6 months following the date that the rule becomes effective to develop and refine the report and perform the necessary testing.

5. Data point for number of days between disconnection and reconnection.

There is some question as to whether or not providing data based on a range of reconnection periods would add any value to the Commission or to consumer groups. The parties have discussed reporting of reconnections that occurred 1 or 2 days out, reconnections that occurred 3-7 days, and reconnections longer than 7 days.

NW Natural is able to provide the data for all of these date ranges and would be supportive of reporting the data in whatever intervals are decided by the parties. We do, however, question the value of reporting the number of reconnections completed within 1 or 2 days as that is the time frame required by the rules under which all utilities operate, and the vast majority of disconnections will fall in this range. It may be more meaningful for the Commission to know how many reconnections fall outside of the OAR parameters. With this in mind, NW Natural suggests that the Commission consider establishing the reporting requirement as the number of reconnects not completed within two business days from the date of disconnection. A further breakdown of the data at say 3-7 days and more than 7 days could also be informative. However, it should be recognized that the utility would not be able to provide any context behind why these reconnections extended beyond the 2 day window.

6. Geographic reporting (County, city, zip, or?).

At the workshop, the utilities expressed concern about the volume of data that would be generated if produced by city or zip code. However, the consumer groups expressed a desire to have the data reported in a manner that might help evaluate the allocation of bill assistance funds throughout the state. NW Natural would be able to report total customers (on a month end basis), and disconnection and reconnection data by city, zip, or by County. However, there could be more 'noise' in the city and zip code data, and it could be quite voluminous. A County based reporting would likely result in the most complete perspective

when looking at data across all reporting utilities and would likely be the most useful to the consumer groups.

7. Frequency and content of the report.

Given the data points under discussion for this reporting obligation, it will be necessary to compile the data on a monthly basis, whether the report is submitted monthly, quarterly, or annually. It is NW Natural's position that even though the data will be gathered monthly, a monthly reporting structure would be burdensome and could present data evaluation challenges for the Commission staff. An annual report would likely provide the best value if the Commission Staff and others are looking for trends and patterns. However, NW Natural would not oppose a quarterly reporting cycle. Regardless of the reporting cycle, it should be clear that the reported data will be summary data for each month in the report period; utilities should not be required to submit the full data file with its report.

Due to the volume of data, NW Natural is concerned about retaining the monthly data in its system for any extended period of time. This reporting obligation, as currently envisioned, will require a significant volume of data to be isolated and captured each month on a point-in-time basis, and will take up considerable storage space in the Company's CIS. NW Natural respectfully requests that this concern be acknowledged in this docket and that the Commission, whether in the rule itself or in the Commission order adopting the new rule, establish a reasonable retention period for the detailed report data. NW Natural is open for discussion on the appropriate retention period, but initially suggests a retention period of 12 months from the date of submission.

As to the content of the report, NW Natural suggests that the following data points be reported for each month in the reporting period and for the reporting period in total:

- Number of residential customers, by County and in total, at month end.
- Number of final (5-day) residential disconnection notices issued for non-payment (by County and in total)
- Number of residential disconnections for non-payment completed in each month (by County and in total), further broken out into:
 - Number of disconnections where the customer had received bill assistance from LIHEAP and/or a utility's tariffed program at any time within the 12-month period preceding the disconnection, and
 - Number of disconnections where the customer had an active medical certificate in effect at the time of disconnection.
- Percentage of total residential customers disconnected at month end, by County and in total.
- Number of residential reconnections not completed within two business days of the date service was disconnected, by County and in total.
- Percentage of total residential reconnections completed more than two business days from the date of disconnection, by County and in total.

8. Relationship between disconnections and the newly adopted weather moratorium rule.

For NW Natural, it would be difficult to make any correlation between disconnection and reconnection data as discussed thus far in this proceeding, and the impact that the weather moratorium may have had on that activity. A potential relationship could be seen from looking at the number of final disconnect notices issued to the timing of completed disconnections. However, because a weather moratorium in any one location is rarely in effect for more than one or two days, there will likely be no noticeable impact on the monthly data. Further, there are so many variables associated with the timing of a reconnection that would impact the numbers, it would be virtually impossible to directly correlate disconnection activity to a weather moratorium event.

NW Natural would not be opposed to providing a Y/N data point to indicate whether a winter moratorium occurred during the month. However, because the Company does not retain information on when or where a weather moratorium event occurred in its system, this information would have to be gathered manually and we would not be able to provide any detailed data specific to any given moratorium event.

NW Natural appreciates the opportunity to provide comments in this rulemaking proceeding, and we look forward to working with the parties as the rulemaking continues to progress.

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