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June 7, 2017

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Ste 100
Post Office Box 1088
Salem, Oregon 97301

Re: UCB 70 – Northwest Natural’s Gas Company’s Answer

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or “Company”), files herewith an Answer in this matter.

Please contact me if you have any questions or require any further information.

Sincerely,

/s/ Zachary D. Kravitz

Zachary D. Kravitz
Associate Counsel

Enclosure

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 UCB 70

4 Industry 10 Studios, LLC)
5 Complainant,) **ANSWER and AFFIRMATIVE**
6 vs.) **DEFENSE of NW NATURAL**
7 NORTHWEST NATURAL)
8 GAS COMPANY, dba NW Natural)
9 Defendant.)
10 _____)

11 Pursuant to Oregon Administrative Rules (OAR) 860-001-0400 and 860-021-
12 0015, Defendant Northwest Natural Gas Company (hereinafter “NW Natural” or
13 “Company”) files its Answer to the Complaint filed with the Public Utility Commission
14 of Oregon on May 23, 2017 and responds as follows:

15 **NATURE OF DISPUTE**

16 1. Complainant is being billed for gas usage that was not previously billed to
17 Complainant account due to a crossed meter. Complainant is asking for NW Natural to
18 demonstrate that the meter connects to Complainant’s water heater and furnace.
19

20 **ANSWER**

21 2. NW Natural denies each allegation in the Complaint, except that NW
22 Natural admits the following: Complainant Industry 10 Studios, LLC located at 1127 SE
23 10th Ave, Suite 200 is a customer of NW Natural receiving natural gas service. On or
24 about, April 4, 2017 Complainant called NW Natural because, according to Complainant,
25 the unit was not receiving gas service. A NW Natural technician went to the
26 Complainant’s address and confirmed that the meter at Unit 200 was “crossed” with the
27 meter at Unit 220. As a result of the crossed meters, when the customer at Unit 220
28

1 contacted NW Natural to terminate gas service, NW Natural shut off service to
2 Complainant. The technician reestablished service to Complainant, corrected the crossed
3 meters, and verified that the Complainant in Unit 200 has a water heater and a furnace.
4 On April 28, 2017, NW Natural mailed the Complainant a bill for \$962.00, which
5 included usage from the correct meter from 2/17/17 to 3/1/17 and included the crossed
6 meter adjustment for the unbilled gas usage from 4/18/16 to 2/17/17 of \$767.97.
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8 **AFFIRMATIVE DEFENSE**

9 3. NW Natural realleges paragraphs 1-2 above and further pleads as follows:

10 **FIRST DEFENSE**

11 4. NW Natural appropriately rebilled the under-billed amounts to the
12 Complainant. OAR 860-021-0135 (2)(a) allows a utility to collect amounts during the
13 12-month period in which the customer was previously under-billed.
14

15 **SECOND DEFENSE**

16 5. The Complaint is barred in whole or in part because it fails to state a claim
17 upon which relief can be granted.

18 **THIRD DEFENSE**

19 6. The Complaint is barred in whole or in part because Complainant has not
20 alleged a violation of any statute, rule, or tariff.
21

22 **FOURTH DEFENSE**

23 7. The Complaint is barred in whole or in part because NW Natural has
24 complied with the terms of the rule and tariff.

25 **WHEREFORE**, NW Natural denies that Complainant is entitled to any relief and
26 because NW Natural acted within the bounds of OAR 860-021-0135(2)(a) and its tariff,
27 NW Natural requests the Commission to grant an Order dismissing the Complaint.
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1 Dated this 7th day of June, 2017.

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Respectfully submitted,
/s/ Zachary D. Kravitz
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