

VIA ELECTRONIC MAIL

July 7, 2020

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

RE: UM 1614— NW Natural's Request for Extension of Waiver

Northwest Natural Gas Company, dba NW Natural, submits the enclosed motion requesting the Commission to grant the Company an extension of the waiver from OAR 860-021-0326(1).

Please address correspondence on this matter to me, with a copy to the following:

eFiling
NW Natural
Rates & Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204
Email: eFiling@nwnatural.com
Telephone: 503-610-7330

Sincerely,

NW Natural

/s/ Natasha Siores

Natasha Siores
Manager, Rates and Regulatory Affairs

Attachment

**BEFORE THE PUBLIC UTILTY COMMISSION
OF OREGON**

UM 1614

In the Matter of

NORTHWEST NATURAL GAS COMPANY,
dba NW Natural,

Motion for Extension of Waiver
From OAR 860-021-0326(1) Disconnection of
Gas or Electric Service to Tenants

MOTION FOR EXTENSION OF WAIVER

I. INTRODUCTION

Pursuant to OAR 860-021-0005, Northwest Natural Gas Company, dba NW Natural (“NW Natural” or “Company”), requests that the Public Utility Commission of Oregon (“Commission”) extend the waiver to comply with OAR 860-021-0326(1). This regulation requires utilities to send duplicate five-day disconnection notices to tenants when the customer of record does not reside at the service address. Although NW Natural is not currently performing service disconnections for non-payment due to the COVID-19 public health emergency, it is seeking to extend this waiver to ensure that it does not lapse. The waiver was originally granted to the Company by Commission Order No. 14-235 and subsequently extended by Commission Order No. 17-302.

II. DISCUSSION

NW Natural filed a request to renew its Motion for Waiver from OAR 860-021-0326(1) on June 22, 2017. In Order No. 17-302, the Commission approved NW Natural’s request for waiver until August 8, 2020, or until OAR 860-021-0326(1) is amended, whichever comes first.

1 The Company is now requesting to extend the waiver because OAR 860-021-0326(1) has not yet
2 been amended.

3 The position of the Company as described in its original June 29, 2012 motion and
4 June 24, 2017 renewal has not changed. As stated in the Staff Reports for both Orders No. 14-
5 235 and 17-302, “billing addresses may differ from service addresses for reasons other than
6 landlord-tenant situations. For example, a utility's customer of record may receive mail at a post
7 office box rather than the service address. It is also possible that a utility’s customer of record
8 has service at both a primary residence and a vacation home.”¹ Due to this situation, Staff
9 agreed with the Company that that “it would be costly and unnecessary to send duplicate five-
10 day disconnect notices based on differing billing and service addresses alone.”² Similarly, as
11 stated in the Company’s June 29, 2012 motion for waiver, it would be cost-prohibitive to
12 perform a one-time or periodic review of the approximately 91,000 residential accounts with
13 different billing addresses. The Commission accepted the recommendations in the Staff Reports
14 and the circumstances have not changed in the intervening years. Therefore, good cause exists to
15 extend the waiver of OAR 860-021-0326(1).

16 In addition, providing a true “duplicate” of the disconnection notice in a landlord-tenant
17 situation would result in the Company disclosing the landlord’s personally identifiable
18 information (PII) to the tenant. Disclosure of the customer’s PII is an additional consideration in
19 need of review. Specifically, OAR 860-021-0326(1) requires the Company to notify an occupant
20 by serving a notice addressed to “Tenants” in the same manner provided for in OAR 860-021-
21 0405(6), with the single exception of the dollar amount owing. However, the five-day

¹ *In the Matter of Northwest Natural Gas Company, dba NW Natural, Petition for Waiver of OAR 860-021-0326(1)*, UM 1614, Order No. 14-235, Appendix A at 3 (2014); *In the Matter of Northwest Natural Gas Company, dba NW Natural, Petition for Waiver of OAR 860-021-0326(1)*, UM 1614, Order No. 17-302, Appendix A at 2 (2017).

² *In the Matter of Northwest Natural Gas Company, dba NW Natural, Petition for Waiver of OAR 860-021-0326(1)*, UM 1614, Order No. 14-235, Appendix A at 3 (2014).

1 disconnect notice contains additional customer-specific information besides the amount owing.
2 Providing a duplicate five-day notice related to a customer account to a third party would violate
3 the Company’s privacy policy. In order to protect customer-specific information, there is good
4 cause to extend the waiver.

5 Finally, as explained in the Company’s June 24, 2017 renewal request, the Company has
6 completed programming and customer service changes that include the following:

- 7 • The Company programmed its Customer Information System (“CIS”) to include a
8 field for tracking accounts where the customer-of-record’s billing address differs
9 from the service address and the customer has indicated that the service address is
10 tenant occupied;
- 11 • The Company made modifications to CIS to ensure that five-day disconnect notices
12 will be sent to these flagged accounts when appropriate; and,
- 13 • The Company’s Customer Service Representatives (CSRs) are trained to ask if a
14 residence is tenant-occupied when the applicant requests a billing address that is
15 different than the service address.

16 Since these programming and customer service changes were implemented on January 1,
17 2013, the Company has identified landlord-tenant situations and flagged those accounts. This
18 ensures that five-day disconnect notices are sent to the flagged accounts where appropriate. In a
19 landlord-tenant scenario, the notice sent meets the requirements of OAR 860-021-0326(2) to
20 prevent the disclosure of the landlord’s PII to tenants.

21 III. REQUEST FOR WAIVER

22 Pursuant to OAR 860-021-0005 and for the reasons explained above, NW Natural
23 requests that the waiver from compliance to OAR 860-021-0326(1), as granted to the Company

1 by Commission Order No. 17-302, be extended until August 8, 2023, or until OAR 860-021-
2 0326(1) is amended, whichever occurs first.

3 Dated this 7th day of July, 2020.

4 Respectfully Submitted,

5 NW NATURAL

6 /s/ Ryan Sigurdson

7 Ryan Sigurdson

8 Regulatory Attorney (OSB# 201722)

9 250 SW Taylor Street

10 Portland, Oregon 97204-3038

11 Telephone: (503) 610-7570

12 Email: ryan.sigurdson@nwnatural.com

13