



250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

August 25, 2020

VIA ELECTRONIC FILING

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

Re: UM 1631 – NW Natural’s Petition for a Partial Waiver of OAR 860-021-0410(4)

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), encloses for filing with the Public Utility Commission of Oregon (Commission) its Petition for a Partial Waiver of OAR 860-021-0410(4), relating to medical certificates.

On April 7, NW Natural filed a petition for a partial waiver of OAR 860-021-0410(4), which the Commission approved in Order No. 20-138 on April 27, 2020. Subsequently, on June 15, the Company filed a Petition to Amend Order No. 20-138, which the Commission granted on June 17, 2020. Given the continuing health crisis and economic turmoil, the Company believes a waiver continues to be in the best interests of NW Natural’s customers.

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

eFiling
NW Natural - Rates & Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204
Telephone: (503) 610-7330
Fax: (503) 220-2579
eFiling@nwnatural.com

If you have any questions, please call me at (503) 610-7074.

Respectfully submitted,

/s/ Natasha Siores

Natasha Siores
Manager, Regulatory Compliance

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1631

In the Matter of

NORTHWEST NATURAL GAS
COMPANY dba NW NATURAL

Petition for a Partial Waiver of OAR 860-
021-0410(4)

PETITION OF NORTHWEST NATURAL
GAS COMPANY dba NW NATURAL

1 Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files
2 this petition under the provisions of ORS 756.040 and in accordance with OAR 860-021-
3 0005. NW Natural requests the Public Utility Commission of Oregon (Commission) issue an
4 order to continue the temporary partial waiver of OAR 860-021-0410(4), currently expiring
5 on September 19, 2020, until December 31, 2020.

6 OAR 860-021-0410(4) requires utilities to provide notice to residential customers
7 when emergency medical certificates are due to expire. Due to the COVID-19 public health
8 emergency, NW Natural seeks a partial waiver of this rule in order to extend the 15-day
9 renewal timeframe to six months.

10 The Company made a separate tariff advice filing on April 7, 2020, with the
11 Commission to temporarily change language in its tariff Rule 10 Emergency Medical
12 Certificates – Residential Customers to be consistent with this waiver request. No further
13 change is required to Rule 10 with this request to continue the temporary partial waiver of
14 OAR 860-021-0410(4).

1 **I. BACKGROUND**

2 On March 8, 2020, Oregon Governor Kate Brown declared a state of emergency due
3 to the public health threat posed by COVID-19. On March 23, 2020, the governor issued
4 Executive Order No. 20-12 to Stay Home, Save Lives, ordering Oregonians to stay at home,
5 and among other things, requiring social distancing measures. The COVID-19 public health
6 emergency and circumstances resulting from stay-at-home and social distancing measures is
7 likely causing a burden for utility customers that need to renew their emergency medical
8 certificates.

9 OAR 860-021-0410(4) states:

10 (4) An emergency medical certificate shall be valid only for the
11 length of time the health endangerment is certified to exist, but
12 no longer than six months without renewal for certificates not
13 specifying chronic illnesses and no longer than twelve months
14 for certificates specifying illnesses identified as chronic by a
15 “Qualified Medical Professional” as defined in this rule. At
16 least 15 days before the certificate’s expiration date, an energy
17 utility will give the customer written notice of the date the
18 certificate expires unless it is renewed with the utility before
19 that day arrives.

20 NW Natural’s initial petition for waiver, filed April 7, 2020, proposed to extend the
21 15-day renewal timeframe in OAR 860-021-0410(4) to six months, for a period of 60 days.
22 In Order No. 20-138, the Commission granted the Company’s petition, with the temporary
23 partial waiver expiring on June 21, 2020. In Order No. 20-190, the Commission granted NW
24 Natural’s petition to extend the partial waiver until September 19, 2020. NW Natural is now
25 seeking to continue the waiver until the end of the calendar year due to the ongoing economic
26 and social conditions caused by the COVID-19 public health emergency.

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II. GOVERNING AUTHORITY

As mentioned above, OAR 860-021-0410(4) requires utilities to provide a 15-day renewal period for medical certificates. OAR 860-021-0005 allows the Commission to grant waivers of any of the Division 021 rules for good cause shown.

III. COMMUNICATIONS

Communications regarding this petition for waiver should be addressed to:

Ryan Sigurdson
Regulatory Attorney
250 SW Taylor Street
Portland, Oregon 97204-3038
Telephone: (503) 610-7570
Email: ryan.sigurdson@nwnatural.com

Natasha Siores
Manager, Regulatory Compliance
250 SW Taylor Street
Portland, Oregon 97204-3038
Phone: (503) 610-7074
Email: natasha.siores@nwnatural.com

NW Natural
e-Filing for Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204-3038
Telephone: (503) 610-7330
Facsimile: (503) 220-2579
Email: eFiling@nwnatural.com

IV. REQUEST FOR WAIVER

NW Natural seeks to continue the partial waiver of OAR 860-021-0410(4) granted by the Commission in Order Nos. 20-138 and 20-190. The partial waiver extends the 15-day renewal timeframe to six months to provide continued flexibility to customers in renewing medical certificates during this uncertain time caused by the COVID-19 public health emergency. Good cause exists to grant NW Natural’s request for waiver. Such a waiver will provide flexibility for medical certificate customers in this uncertain time caused by the COVID-19 public health emergency. Further, customers will not be harmed by the granting of this waiver.

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Date this 25th day of August, 2020.

Respectfully Submitted,

NW NATURAL

/s/ Ryan Sigurdson

Ryan Sigurdson

Regulatory Attorney (OSB# 201722)

250 SW Taylor Street

Portland, Oregon 97204-3038

Telephone: (503) 610-7570

Email: ryan.sigurdson@nwnatural.com