



250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

April 7, 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 Limited Waiver of OAR 860-021-0410(4)

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

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 seeks an order from the Public Utility Commission of Oregon
4 (Commission) granting a partial waiver of OAR 860-021-0410(4). OAR 860-021-0410(4)
5 relates to Emergency Medical Certificates for Residential Electric and Gas Service, providing
6 the parameters for the duration of emergency medical certificates and requiring utilities to
7 provide notice to customers when emergency medical certificates are due to expire. NW
8 Natural seeks a partial waiver of this rule to extend the 15-day renewal timeframe to six
9 months due to the COVID-19 public health emergency. NW Natural respectfully requests
10 this waiver to be effective immediately, for an initial period of 60 days. Due to the fluidity of
11 the public health emergency, the Company will monitor the situation and continually
12 evaluate the need to seek a continuance of the waiver. The Company will also make a
13 separate tariff advice filing with the Commission to temporarily change language in its tariff
14 Rule 10 Emergency Medical Certificates – Residential Customers to be consistent with this
15 waiver request.

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 public health emergency
6 caused by COVID-19 and circumstances resulting from stay-at-home and social distancing
7 measures will likely cause a burden for utility customers that need to renew their emergency
8 medical 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 proposes to extend the 15-day renewal timeframe contemplated in OAR
21 860-021-0410(4) to six months. NW Natural will provide the customer written notice that
22 the medical certificate is expiring and provide a six-month period for the customer to provide
23 a renewed medical certificate.

24 **II. GOVERNING AUTHORITY**

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

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III. COMMUNICATIONS

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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

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IV. REQUEST FOR WAIVER

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NW Natural seeks this partial waiver of OAR 860-021-0410(4) to extend the 15-day

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renewal timeframe to six months to provide flexibility to customers in renewing medical

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certificates during this uncertain time caused by the COVID-19 public health emergency.

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NW Natural will provide the customer written notice that the medical certificate is expiring

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and provide a six-month period for the customer to provide a renewed medical certificate.

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The Company seeks this flexibility in order to be immediately responsive to the

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rapidly changing economic and social conditions facing customers in the wake of the

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COVID-19 pandemic and respectfully requests this waiver to be effective immediately, for

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an initial period of 60 days. Due to the fluidity of the public health emergency, the Company

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will monitor the situation and continually assess the need to seek any continuance of the

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waiver. Good cause exists to grant NW Natural’s request for waiver. Such a waiver will

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provide flexibility for medical certificate customers in this uncertain time caused by the

1 COVID-19 public health emergency. Further, customers will not be harmed by the granting
2 of this waiver.

3 Date this 7th day of April, 2020.

4 Respectfully Submitted,

5 NW NATURAL

6 /s/ *Natasha Siores*

7 Natasha Siores

8 Manager, Regulatory Compliance