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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 860-021-0130(2)

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 860-021-0130(2).

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-
021-0130(2)

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. Due to the COVID-19 public health emergency, NW Natural seeks an order from the
4 Public Utility Commission of Oregon (Commission) granting a partial waiver of OAR 860-
5 021-0130(2). OAR 860-021-0130(2) relates to meter tests, specifying that “A customer
6 and/or a designated representative shall have the right to be present at any meter test.” NW
7 Natural respectfully requests waiver of this rule effective immediately, for an initial period of
8 60 days. Due to the fluidity of the public health emergency, the Company will monitor the
9 situation and continually evaluate the need to seek a continuance of the waiver.

I. BACKGROUND

11 On March 8, 2020, Oregon Governor Kate Brown declared a state of emergency due
12 to the public health threat posed by COVID-19. On March 23, 2020, the governor issued
13 Executive Order No. 20-12 to Stay Home, Save Lives, ordering Oregonians to stay at home,
14 and among other things, requiring social distancing measures. Consistent with these social
15 distancing measures, waiving OAR 860-021-0130(2) during the COVID-19 public health

1 emergency will help protect customers and NW Natural employees from potential exposure
2 to COVID-19.

3 **II. GOVERNING AUTHORITY**

4 As mentioned above, OAR 860-021-0130(2) specifies “A customer and/or a
5 designated representative shall have the right to be present at any meter test.” OAR 860-021-
6 0005 allows the Commission to grant waivers of any of the Division 021 rules for good cause
7 shown.

8 **III. COMMUNICATIONS**

9 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

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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

10 **IV. REQUEST FOR WAIVER**

11 Good cause exists to grant NW’s Natural’s request for waiver of OAR 860-021-
12 0130(2) due to the COVID-19 public health emergency. A waiver will benefit customers and
13 NW Natural employees by limiting potential exposure to COVID-19 through social
14 distancing.

