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REPORT NAME: HB 2599 - Report to Public Utility Commission

COMPANY NAME: NW Natural Gas Company

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION? [X]No []Yes

If yes, please submit only the cover letter electronically. Submit confidential information as directed in OAR 860-001-0070 or the terms of an applicable protective order.

If known, please select designation: []RE (Electric) [X]RG (Gas) []RW (Water) []RO (Other)

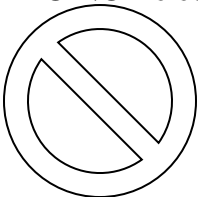
Report is required by: []OAR OAR 860-027-0100 and 860-027-0048(6)
[]Statute
[]Order
[X]Other HB 2599

Is this report associated with a specific docket/case? [X]No []Yes

If yes, enter docket number:

List applicable Key Words for this report to facilitate electronic search:
HB 2599 Report to the Public Utility Commission

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• Accident reports required by ORS 654.715

Please file the above reports according to their individual instructions.

Onita R. King
Rates and Regulation
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October 30, 2015

VIA ELECTRONIC FILING

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

Re: HB 2599 Report to the Public Utility Commission

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the report required by HB 2599, Section 1, part (2).

HB 2599 Section 1, Part (2) reads:

(2) Each utility that provides electric or natural gas service to residential customers shall prepare a report on the utility's processes that mitigate, for nonpayment of a delinquent account, the termination of electric or natural gas service to a residential customer belonging to a protected class if the termination would occur:

(a) During the heating season;

(b) On any date for which the National Weather Service forecasts that the temperature of a location both within this state and the service territory of the utility will exceed 100 degrees Fahrenheit for a period of 12 or more hours; or

(c) On any date for which the National Weather Service forecasts that the temperature of a location both within this state and the service territory of the utility will be less than 32 degrees Fahrenheit for a period of 12 or more hours.

HB 2599 Section 1, Part (1)(b) defines a protected class, and reads:

(b) "Residential customer belonging to a protected class" means a person who is a residential customer of a utility who receives state or federal heating assistance and who is:

(A) A low-income senior citizen;

(B) An active duty member of the Armed Forces of the United States;

(C) A customer whose household includes a seriously ill individual or a person with a disability;

(D) A customer whose household includes a child under the age of 12 months;

(E) A customer who belongs to a household where the member of the household whose earnings are the primary source of support for the household has died within the past six months; or

(F) A customer who belongs to a household where the member of the household whose earnings are the primary source of support for the household has lost a job within the past six months.

NW Natural complies with Division 21 of the Oregon Administrative Rules (OAR 860-21-0305, 0320, 0326, 0335, 0338, and 0405) pertaining to the disconnection and reconnection of service for all residential customers. NW Natural also complies with OAR 860-021-0410, which provides additional protection for customers with a reported medical condition. When NW Natural is contacted by any customer with a medical issue, NW Natural will document in its Customer Information System (CIS) the medical condition claim and will retain the doctor's certificate for the medical condition in its records. In addition, NW Natural complies with OAR 860-021-0206 regarding payment plans on deposits and OAR 860-021-0415 regarding payment plans on past-due amounts. Payment plans on past-due amounts serve as a means for customers to avoid disconnection of service.

During the winter heating season, it is NW Natural's practice to withhold disconnection of service for nonpayment if the weather in the customer's vicinity is forecasted to be 32 degrees Fahrenheit or less by 11:00 o'clock a.m. on the scheduled disconnection date. Because natural gas is not directly used for space cooling, NW Natural does not withhold disconnection of service for nonpayment if the weather is forecasted to exceed 100 degrees Fahrenheit.

NW Natural does not collect the information set forth in HB 2599 Section 1 Part (1)(b) which is used to define a residential 'protected class', with the exception of reported medical conditions in the household, addressed above. NW Natural relies on third-party community action agencies to qualify and deliver energy assistance programs (LIHEAP and Tariffed programs) to our residential customers. As such, these agencies income qualify customers that apply through them for bill payment assistance and are responsible for gathering the required personal information (e.g. number and age of children in the home, job status, recent changes in the household, etc.) from the applicant that the agencies determine necessary to provide assistance services under the applicable state, federal, and utility specific programs.

OPUC Staff Request dated August 4, 2015

In addition to the report filed pursuant to HB 2599 Section 1, Part (2), by letter dated August 4, 2015, Commission Staff requested additional information related to disconnections for the 2013 through YTD 2015 time period. NW Natural provides an Excel attachment to this report that contains the requested data. Please note the following with regard to the use of the Excel attachment:

The first "count" column reflects the total number of disconnections in that month. Using the date 201301 as an example, the data should be read across the sheet as follows:

There were a total of 1545 disconnects.

- Of the total 1545 disconnects, 1540 had money owing in the service field (gas usage), totaling \$207,579.06 service dollars.
- Of the total 1545 disconnects, 349 had money owing in the plan field (time payment plan), totaling \$44,309.54 in plan dollars
- Of the total 1545 disconnects, 137 had money owing in the deposit field (deposit payment plan), totaling \$6,709.43 in deposit dollars.
- Of the 1545 disconnects, 250 had received energy assistance
 - Of the 250, 247 had money owing in the service field (gas usage), totaling \$37,006.69 service dollars.

- Of the 250, 99 had money owing in the plan field (time payment plan) totaling \$12,468.94.
- Of the 250, 25 had money owing in the deposit field (deposit payment plan) totaling \$1,122.58
- Of the 1545, 2 had a medical exemption
 - Both had money owing in the service field (gas usage) totaling \$403.83

If an account fell into more than one category they are counted in each category.

With regard to Staff Data Request No. 2 (A and C), please note for clarification purposes that OEAP does not apply to NW Natural. As such, NW Natural's response includes customers that received LIHEAP and/or assistance from the Company's tariffed program or from the Company's Gas Assistance Program (GAP), which is funded through donations. With regard to No. 2 (D and E), NW Natural does not collect or retain customer information regarding household income or age (senior status).

With regard to Staff Data Request No. 3, please note that the amounts include amounts associated with time payment plans although the payment plan itself may be current.

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

eFiling
NW Natural Rates & Regulatory Affairs
220 NW Second Avenue
Portland, Oregon 97209
Telephone: (503) 226-4211, x. 3589
Telecopier: (503) 721-2516
eFiling@nwnatural.com

Sincerely,

NW NATURAL

/s/ Onita R. King

Onita R. King
Rates & Regulatory Affairs

Attachment: NWN HB2599 Disconnect Data 2015

NORTHWEST NATURAL GAS COMPANY Attachment to HB2599 Report: Disconnect Data - OPUC Staff Request
30-Oct-15

YYYYMM	Staff Request No. 1 (A, B and C)							Staff Request No. 2 (A and C)							Staff Request No. 2 (B)							Staff Request No. 3			
	Total Disconnects							Disconnects with Energy Assistance							Disconnects with Medical Exemption							Total Customers in Arrears [1]			
	Service Amount	Service Count	Plan Amount	Plan Count	Deposit Amount	Deposit Count	Count	Service Amount	Service Count	Plan Amount	Plan Count	Deposit Amount	Deposit Count	Count	Service Amount	Service Count	Plan Amount	Plan Count	Deposit Amount	Deposit Count	Count 31-60 Days	Total 31-60 Days	Count 61-90 Days	Total 61-90 Days	
201301	1,545	207,579.06	1,540	44,309.54	349	6,709.43	137	250	37,006.69	247	12,466.94	99	1,122.58	25	2	403.83	2	-	-	-	64,877	\$3,725,357.48	28,797	\$828,873.72	
201302	1,687	267,797.01	1,686	49,296.83	374	4,009.66	93	272	49,095.21	272	13,329.60	94	980.45	20	-	-	-	-	-	-	61,502	\$4,773,499.94	21,572	\$922,740.48	
201303	1,958	367,199.66	1,957	71,812.16	530	3,316.44	69	319	71,658.99	319	22,765.06	161	931.86	17	2	2,273.77	2	595.48	2	-	90,602	\$9,128,338.92	21,799	\$1,277,178.84	
201304	2,208	437,755.86	2,207	85,149.11	719	4,183.81	98	368	85,796.38	368	23,938.24	199	658.70	13	7	3,865.10	7	2,008.02	7	-	115,171	\$10,776,711.61	41,429	\$3,042,787.84	
201305	2,331	457,448.14	2,329	84,200.69	810	4,339.35	80	397	91,409.29	397	21,295.51	205	827.39	16	2	1,091.54	2	236.89	2	-	110,730	\$8,440,382.06	55,254	\$4,052,716.76	
201306	1,957	387,962.89	1,957	81,775.18	791	3,805.66	76	302	67,255.85	302	17,140.55	163	550.29	10	2	731.40	2	274.90	2	-	115,927	\$7,172,129.08	61,118	\$3,960,069.99	
201307	1,725	312,380.78	1,722	73,711.59	770	3,006.39	58	290	60,160.88	289	16,513.85	164	534.91	12	5	2,204.85	5	1,201.45	4	-	110,691	\$4,579,513.79	64,027	\$3,465,200.05	
201308	1,102	187,169.59	1,102	50,022.69	513	3,558.79	58	174	35,125.16	174	10,033.56	102	483.76	9	5	3,102.80	5	937.27	5	-	89,962	\$2,446,640.02	54,744	\$1,958,398.14	
201309	858	124,788.44	858	38,526.10	407	2,485.52	43	168	29,309.32	168	9,446.35	110	420.00	7	1	320.67	1	101.00	1	-	76,346	\$1,988,360.10	44,922	\$1,138,868.70	
201310	789	106,852.30	784	31,831.98	323	3,588.42	52	113	19,103.10	111	6,612.34	71	244.00	3	1	192.81	1	52.89	1	-	69,249	\$1,726,703.44	23,966	\$864,204.32	
201311	544	66,352.09	535	16,518.14	181	2,201.33	34	74	9,755.88	73	3,736.23	36	365.00	6	1	191.38	1	59.45	1	-	60,333	\$1,599,024.33	31,754	\$682,678.42	
201312	743	96,466.08	741	24,516.39	221	3,519.72	60	118	17,505.18	118	6,352.36	59	474.30	10	-	-	-	-	-	-	62,934	\$2,810,255.37	28,853	\$661,217.13	
201401	1,558	215,486.02	1,557	45,407.77	368	5,903.79	121	242	38,544.34	242	13,660.98	106	903.85	17	-	-	-	-	-	-	56,545	\$3,345,899.92	27,407	\$990,324.10	
201402	1,509	261,300.75	1,505	51,602.35	348	3,337.26	82	159	30,875.12	158	10,475.14	68	342.00	7	3	329.17	2	467.56	3	-	68,752	\$6,392,751.82	20,934	\$966,674.89	
201403	2,032	371,042.72	2,028	68,362.16	505	3,967.14	87	263	57,680.13	262	16,512.16	122	845.36	20	-	-	-	-	-	-	95,781	\$9,498,756.19	24,883	\$1,708,641.71	
201404	2,368	490,676.30	2,364	104,584.23	815	4,740.07	101	345	84,189.34	344	24,903.14	191	453.29	17	5	2,783.21	5	968.63	4	-	114,315	\$11,548,375.06	42,563	\$3,227,465.69	
201405	2,041	437,628.89	2,037	86,604.94	794	2,384.15	66	284	72,317.62	284	17,651.28	160	(146.00)	5	2	83.07	1	150.00	1	-	119,901	\$9,624,401.75	58,885	\$4,744,671.82	
201406	1,964	397,313.36	1,961	80,634.50	786	2,902.57	70	255	59,106.19	253	15,055.92	140	(159.97)	6	3	768.89	2	588.69	3	-	124,271	\$8,002,080.18	69,192	\$4,947,137.29	
201407	1,460	285,754.34	1,458	66,034.02	694	2,684.48	56	217	47,832.08	215	12,375.04	131	174.00	9	8	3,054.78	8	1,326.04	8	-	107,389	\$4,665,143.37	69,748	\$3,956,581.16	
201408	916	160,553.04	915	44,222.87	472	2,622.60	47	148	30,328.92	148	8,967.08	90	477.35	9	-	-	-	-	-	-	92,575	\$2,150,630.72	55,897	\$2,153,003.55	
201409	978	155,549.31	977	48,382.89	524	2,896.22	59	155	26,495.66	155	8,360.42	96	337.86	8	1	182.66	1	182.66	1	-	81,499	\$2,222,436.21	46,824	\$1,015,067.69	
201410	641	91,177.63	637	27,719.68	301	2,564.13	42	105	17,238.25	104	6,069.55	74	345.19	5	6	360.16	2	526.60	5	-	65,227	\$1,550,609.49	37,586	\$899,287.49	
201411	425	53,376.18	422	14,606.12	157	1,184.82	22	59	7,971.40	58	2,963.68	35	165.00	3	-	-	-	-	-	-	60,694	\$1,548,247.65	31,298	\$657,993.50	
201412	656	80,358.30	653	21,056.79	199	4,057.71	68	96	14,254.18	95	5,053.39	49	808.04	12	-	-	-	-	-	-	63,700	\$2,007,463.78	30,904	\$693,485.95	
201501	1,358	189,393.97	1,358	38,067.82	283	4,817.16	99	149	22,930.31	149	7,381.54	58	963.50	14	-	-	-	-	-	-	57,615	\$3,560,463.96	26,385	\$673,097.37	
201502	1,567	245,052.82	1,564	49,097.72	367	4,119.62	96	158	28,422.24	158	8,668.89	64	607.67	12	-	-	-	-	-	-	64,628	\$5,451,699.92	20,565	\$992,646.05	
201503	1,980	337,295.88	1,976	64,662.95	482	8,107.85	131	203	37,446.16	202	10,957.36	79	791.29	20	-	-	-	-	-	-	88,451	\$8,433,055.94	21,429	\$1,414,669.99	
201504	1,685	309,596.83	1,682	64,361.19	555	3,667.28	82	186	43,340.22	185	14,183.91	110	547.50	13	1	289.92	1	117.57	1	-	91,656	\$6,980,430.10	33,698	\$2,458,156.31	
201505	1,597	306,189.84	1,594	63,315.00	600	2,861.48	58	210	48,052.08	210	13,197.46	124	523.12	10	1	290.67	1	82.93	1	-	97,413	\$6,515,917.01	38,880	\$2,415,106.51	
201506	1,920	345,403.80	1,918	69,799.94	709	2,292.46	54	248	54,310.57	247	13,943.57	134	523.37	8	3	201.02	1	501.18	3	-	105,703	\$6,280,447.72	46,411	\$2,653,313.98	
201507	1,368	228,735.37	1,368	48,560.32	528	2,499.44	54	161	32,669.74	161	9,101.67	100	106.00	5	1	830.16	1	146.49	1	-	84,348	\$3,713,772.05	47,726	\$2,388,888.99	
201508	902	134,279.62	901	31,175.79	356	2,830.10	52	90	15,583.08	90	4,273.45	49	197.97	7	-	-	-	-	-	-	76,512	\$1,880,745.55	40,562	\$1,598,759.07	
201509	742	99,278.28	742	26,996.49	296	3,330.79	51	58	8,713.68	58	2,504.87	28	154.00	4	5	1,185.56	5	622.83	4	-	65,187	\$1,598,494.98	37,571	\$880,574.35	

Staff Request 1: Monthly breakdown for calendar years 2013, 2014 and YTD 2015 of the number of disconnections for: A. Non-payment of a delinquent bill B. Non-payment of a deposit or deposit installment C. Failure to abide by terms of a TPA	Staff Request 2: If possible, this information should be further broken down by group to include: A. LIHEAP/OEAP recipients B. Emergency Medical Certificate holders C. Other customers how are not LIHEAP/OEAP recipients And if the data is available, by: D. Household income E. Senior status	Staff Request 3: The report should also show (by month) the number of customer's 60-days in arrears and total dollars 60-days in arrears.
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[1] Includes accounts on payment plans and Equal Pay