

**Natasha Siores**  
Manager, Regulatory Compliance  
Tel: 503.721.2452  
Fax: 503.220.2579  
Email: natasha.siores@nwnatural.com



January 8, 2020

NWN OPUC Advice No. 20-1

**VIA ELECTRONIC FILING**

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

**Re: Schedule B—Bills and Bill Payment Options**

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following revisions to its Tariff P.U.C. Or. 25, stated to become effective with service on and after **March 1, 2020**:

Third Revision of Sheet B-1	Schedule B	Bills and Bill Payment Options
Third Revision of Sheet B-2	Schedule B	Bills and Bill Payment Options
Second Revision of Sheet B-3	Schedule B	Bills and Bill Payment Options

**Purpose**

The purpose of this filing is to update Schedule B Bills and Bill Payment Options (Schedule B) to: 1) accommodate new forms of payment, 2) update outdated language related to bankcard payments, paper forms and letters, and 3) streamline the flow of information within the Auto Pay Plan section.

**Background**

Schedule B provides a general description of the various billing and bill payment options available to NW Natural's customers. In 2020, NW Natural will be working with a new payment processor for transacting payments online. As a result, NW Natural customers will be able to make electronic payments using a variety of methods that are not currently listed in Schedule B. In addition, NW Natural takes this opportunity to remove outdated language and provide changes that streamline the flow of information in Schedule B.

**Proposed Changes**

NW Natural proposes to update Schedule B to reflect the availability of electronic payment methods and to update other outdated language related to bankcard payments and to reduce the use of paper forms. In addition, the Company proposes other changes to streamline the flow of information in Schedule B. These changes are described as follows.

Sheet B-1

**Description section**

- NW Natural proposes to remove the statement that customers may use any automated payment option in conjunction with Equal Pay because this language is extraneous; the Auto Pay Plan section provides details about automated payment options that are available to customers, including Equal Pay customers.

**Standard Billing and Bill Payment section**

- NW Natural proposes to remove the language that delineates specific electronic payment methods. This ensures that new electronic payment methods are not unduly excluded as they become available.
- The Company also proposes to simplify how it describes types of electronic payments, clarifying that customers can make such payments by Automated Clearing House network payments (ACH payments) or by other electronic payment methods (non-ACH payments).

**Paperless Billing section**

- NW Natural proposes to remove the reference to e-mail with regard to the monthly bill notification, and instead proposes the term electronic bill notification to convey that the notification may be provided via email or a text or other electronic means.
- The Company also proposes to remove the sentence that customers selecting paperless billing may choose any payment option because this language is extraneous and does not provide meaningful information. The Auto Pay section provides details about payment options available under Auto Pay.
- NW Natural proposes to add the sentence restricting customers using the Summary Bill service from using Paperless Billing to make the Company's current practice explicit and transparent in Schedule B.
- NW Natural also proposes to remove the restriction prohibiting customers on Interruptible Service or Transportation Service schedules from using Paperless Billing. This language was previously included in Schedule B due to limitations in the Company's billing system. However, NW Natural's system is now able to provide Paperless Billing for these customers and the restriction is no longer applicable.

**ACH Payments section**

- The Company proposes to move the section entitled "Online Checking Account Payments" from Sheet B-3 to Sheet B-1 and rename it "ACH Payments".

- NW Natural proposes to revise the language in the section to include payments from savings accounts and to move the language about returned payments into a consolidated Payments Not Honored section discussed below.

#### **Other Electronic (non-ACH) Payments section**

- NW Natural proposes to move the section entitled “Bankcard Payment” from Sheet B-3 to Sheet B-1 and rename it “Other Electronic (non-ACH) Payments”.
- Additionally, NW Natural proposes to restrict third-party commercial payers and payment aggregators from using non-ACH payments so that these entities do not benefit from the Company’s fee-free non-ACH payment service.
- The Company proposes to move the language regarding payment failures from this section into a consolidated Payments Not Honored section discussed below.

#### **Auto Pay Plan section**

- NW Natural proposes to not specify the types of accounts (e.g., checking, savings, or bankcard) that are eligible for Auto Pay so that new payment methods are not unduly excluded as they become available.
- In addition, the Company proposes language to clarify that customers will be providing account information to NW Natural or its authorized payment processor that will be facilitating online payments.

#### Sheet B-2

#### **Auto Pay Plan (continued) section**

- Generally, NW Natural proposes changes throughout this section to continue the use of the ACH and non-ACH terminology as established earlier on Sheet B-1.
- In the Checking or Savings Account (ACH) Eligibility sub-section, NW Natural proposes to have all customers sign up through the Company’s website, and no longer allow customers to submit a written application form to sign up for ACH Auto Pay.

Currently, ACH is the only payment option where customers may submit a written application form. Non-ACH payment methods already require customers to sign up on the Company’s website. Continuing to offer the paper enrollment form for ACH payments presents a risk to the Company and its customers due to the Company receiving its customers’ personally identifiable information.

When the Company goes live with its new payment processor in 2020, customers’ ACH information will move off of NW Natural’s system, like customers’ bankcard information already is. At that time, the Company will no longer have customer personally identifiable information on its systems related to customers’ payment options. This will minimize the risk and burden to customers and will ensure that NW Natural will not be in the position of collecting,

processing and storing customer ACH information from paper forms as required by National Automated Clearing House Association Operating Rules.

The Company is mindful that the paper enrollment form may be important to customers wishing to sign up for ACH Auto Pay. As a result, NW Natural's customer contact center is developing a business process to assist customers needing an accommodation to set up ACH Auto Pay by phone.

Currently, the ACH Auto Pay enrollment paper form is printed on the back of customer bills. The Company has existing printed bill stock that includes the enrollment form that is expected to last until early 2020. If this change is approved, NW Natural would end the paper enrollment when the bill stock is exhausted. To accommodate this, the Company has requested an effective date for the changes to Schedule B described herein of March 1, 2020.

- In the ACH and non-ACH Eligibility sections, NW Natural proposes to move the language regarding returned payments and payment failures into a consolidated Auto Pay Payments Not Honored section discussed below.
- NW Natural proposes to greatly streamline Sheets B-2 and B-3 by consolidating the language regarding returned payments and payment failures for both ACH and non-ACH payments into the proposed new sub-section Auto Pay Payments Not Honored. This new sub-section simply incorporates the language that existed in Sheets B-2 and B-3 with regard to Auto Pay returned payments and failed payments, creating a more streamlined flow of information in Schedule B.

#### **Payments Not Honored section**

- NW Natural proposes promoting this section to be applicable to the entire Schedule B, which is made possible by the proposed creation of the Auto Pay Payments Not Honored section, and together contributes to the streamlining of information in Schedule B.

#### **Sheet B-3**

As described above, the Bankcard Payment and Online Checking Account Payments sections have been renamed and revised and moved to Sheet B-1.

#### **Conclusion**

NW Natural believes the changes proposed above will better reflect the bill and bill payment options available to its customers.

In compliance with OAR 860-022-0025 NW Natural states that the tariff changes proposed in this filing will have no impact on customer rates.

In accordance with ORS 757.205, copies of this letter and the filing made herewith are available in the Company's main office in Portland, Oregon and on its website at [www.nwnatural.com](http://www.nwnatural.com).

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

eFiling  
NW Natural Rates & Regulatory Affairs  
220 NW Second Avenue  
Portland, Oregon 97209  
Fax: (503) 220-2579  
Telephone: (503) 226-4211, ext. 3589  
eFiling@nwnatural.com

If you have any questions, please call me at (503) 721-2452.

Respectfully submitted,

*/s/ Natasha Siores*

Natasha Siores  
Manager, Regulatory Compliance

Attachments

# NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Third Revision of Sheet B-1  
Cancels Second Revision of Sheet B-1

---

## SCHEDULE B BILLS AND BILL PAYMENT OPTIONS

### AVAILABLE:

In all territory served by the Company under the Tariff of which this Schedule is a part.

### DESCRIPTION:

This Schedule describes the various bill and bill payment options available to the Company's Customers. Once elected, the bill and payment option(s) will remain in effect until terminated by Customer, or until terminated by the Company should Customer fail to comply with its terms.

(T)  
(C)(D)

### STANDARD BILLING AND BILL PAYMENT:

Unless a paperless billing option is elected, Customers will receive a printed bill via U.S. Mail. Bills may be paid by check, money order or in cash, or electronically by bank-to-bank payments made through the Automated Clearing House network (ACH Payments) or by other electronic (non-ACH) payments. Payments made by means other than cash shall be considered valid only when honored by the Customer's financial institution.

(C)(D)  
(C)  
(T)

### PAPERLESS BILLING:

Paperless billing is an online bill presentment option available to most Customers directly through NW Natural. Under this bill option, a monthly electronic bill notification is sent to the Customer fifteen (15) days prior to the stated due date. The bill notification includes at least the amount due, the due date, and a link back to a secure area in the Company's website where, upon valid sign-in, the Customer can view their bill statement. No paper bill will be issued. Customers can enroll in this bill presentment option via the Company's website. To enroll, Customers must register at the Company's website using a valid gas account number, and e-mail address. Customers using the Company's Summary Bill services are not eligible for paperless billing.

(T)  
(T)(D)  
(C)  
(C)  
(C)

### ACH PAYMENTS

Customers can make secure online checking or savings account payments at the Company's website or through the company's Interactive Voice Recognition (IVR) system. To use this payment option, Customers must provide valid checking or savings account information for the account from which payments are to be deducted. When making an ACH payment, payments will be automatically deducted from Customer's bank account and credited to Customer's gas service account on the date specified by the Customer, or the following business day if the date specified is a weekend or Holiday.

(M)(C)  
(C)  
(C)  
(C)  
(M)

### OTHER ELECTRONIC (non-ACH) PAYMENTS

Residential Customers and Non-Residential Rate Schedule 3 Customers with annual usage of 25,000 therms or less can make bill payments with a non-ACH payment method (such as a credit card or debit card) at any time. A non-ACH payment can be made online on the Company's website or through the Company's Interactive Voice Recognition system. The Company may limit the number of transactions that can be made in any given time period. The Company reserves the right to deny a Customer the use of the non-ACH payment option when a bank card interchange network declines a Customer's transaction for reasons of fraud or other illegal use. The Company will not accept non-ACH payments from third-party commercial payers and/or payment aggregators.

(M)(C)  
(C)  
(C)  
(D)  
(M)(N)  
(N)

### AUTO PAY PLAN:

The Auto Pay Plan is an electronic bill payment option available to Customers as described below. Auto Pay allows for automatic bill payments to be made to the Company directly from Customer's financial institution ("Bank Account"). To participate, Customers must provide valid account information to the Company or its authorized payment processor. Payments will be automatically deducted from Customer's Bank Account and credited to Customer's gas service account on the payment due date stated on Customer's bill

(C)  
(C)

(continue to Sheet B-2)

Issued January 8, 2020  
NWN OPUC Advice No. 20-1

Effective with service on  
and after March 1, 2020

# NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Third Revision of Sheet B-2  
Cancels Second Revision of Sheet B-2

---

## SCHEDULE B BILLS AND BILL PAYMENT OPTIONS (continued)

### AUTO PAY PLAN (continued):

#### Checking or Savings Account (ACH) Eligibility.

All Customers are eligible for the Auto Pay Plan using the checking or savings account payment option, except that Customers using the Company's Summary Bill services are not eligible.

Customers may sign up through the Company's website.

(T)

(C)(D)

#### Other Electronic Payment Methods (non-ACH) Eligibility.

Residential and Non-Residential Rate Schedule 3 Customers with annual usage of 25,000 therms or less are eligible for the Auto Pay Plan using a bankcard (credit or debit card) or alternative electronic payment methods as may be offered by the Company, except that Customers using the Company's Summary Bill services are not eligible. Customers must sign up through the Company's website.

(T)

(N)

(N)

(C)

#### Auto Pay Payments Not Honored.

All Auto Pay payments that are not honored by the Customer's financial institution will be subject to the same Payments Not Honored rules for all payment methods in this Schedule B.

(C)

(C)(T)

(C)(T)

In the event that a payment failure occurs because the Bank Account is reported closed or a payment method has expired the Company will terminate the Customer's Auto Pay Plan.

(C)

(C)

Two (2) payment failures in a twelve-month period may be cause for the Company to automatically terminate Customer's Auto Pay Plan and the customer may be restricted from enrolling in the Auto Pay Plan for the next 12-month period.

The Company will notify the Customer advising them of any termination of the Auto Pay Plan due to payment(s) not honored.

(T)

(T)

Should the Company find that a Customer no longer qualifies for the non-ACH option, regardless of the account status, the Company will notify the Customer and the Customer will be removed from the Auto Pay Plan non-ACH option. The Customer may sign up for the Auto Pay Plan ACH option provided they meet the eligibility requirements described in this Schedule B.

(T)

(T)

(T)

### PAYMENTS NOT HONORED.

When any payment failure occurs, a Payment Not Honored charge as set forth in **Schedule C** will be assessed to Customer's account at that time, and the gas service account will be considered delinquent. Failure to pay such account will be cause for Disconnection of Service. Two (2) payment failures in a twelve-month period may be cause for the Company to restrict payment method options for the next 12-month period.

(C)

(C)

The Company will notify the Customer advising them of any payment failures due to a payment not honored.

(N)

(N)

(continue to Sheet B-3)

Issued January 8, 2020  
NWN OPUC Advice No. 20-1

Effective with service on  
and after March 1, 2020

# NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Second Revision of Sheet B-3  
Cancels First Revision of Sheet B-3

---

## **SCHEDULE B** **BILLS AND BILL PAYMENT OPTIONS** (continued)

(M)

### **RESIDENTIAL EQUAL PAY PLAN:**

Residential Customers whose gas service accounts are current may sign up for the Equal Pay Plan at any time during the calendar year.

The Residential Equal Pay Plan is a bill payment option designed to levelize Customer's monthly payments for gas service over an eleven-month period. Levelized monthly payments are based on (a) the rates stated in Customer's respective Rate Schedule and (b) an estimate of Customer's projected annual usage requirements, determined from prior usage history at the service address, or from a calculated usage adjusted for Customer's current requirements.

(continue to Sheet B-4)

Issued January 8, 2020  
NWN OPUC Advice No. 20-1

Effective with service on  
and after March 1, 2020