



Oregon

Kate Brown, Governor

Public Utility Commission

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March 20, 2020



BY EMAIL

NW Natural

Natasha Siores

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RE: Advice No. 20-3

At the public meeting on March 20, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1102. The Staff Report, a receipted copy of the sheets in your advice filing, and the signed LSN are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

ITEM NO. RA2

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: March 20, 2020

REGULAR CONSENT EFFECTIVE DATE _____ Upon Commission Approval _____

DATE: March 19, 2020

TO: Public Utility Commission

FROM: John Crider

THROUGH: Bryan Conway

SUBJECT: NORTHWEST NATURAL GAS:
(Docket No. ADV 1102)
Request a change to Sheet C-2, Schedule C to allow a temporary suspension of the Late Payment Charge.

STAFF RECOMMENDATION:

Staff recommends that the Commission approve Northwest Natural Gas's (Company) request for a tariff change in order to allow for temporary suspension of late charges for unpaid accounts with less than statutory notice.

DISCUSSION:

Issue

Whether the Commission should approve the Company's request to modify language in its tariff sheet in order to allow discretionary suspension of late charges for unpaid accounts.

Applicable Rule or Law

ORS 757.205, OAR 860-022-0025, and OAR 860-022-0030 establish rules for tariff changes and updates to rates. ORS 757.220 provides for less than 30 days' notice for a tariff change with good cause.

Analysis

The language in the Company's Schedule C – Miscellaneous Charges states in part: "A late payment charge *will* be applied to Customer accounts not paid in full each month by the payment due date" (emphasis added). The Company proposes to replace the word "will" with the word "may" in order to provide discretion in applying the charge. This flexibility will allow the Company to temporarily waive late charges for unpaid accounts during the declared COVID-19 emergency.

In its petition, the Company states that it considers the tariff revision to be practical in the face of changing economic conditions for its Oregon customers, and believes the flexibility to waive charges is in the best interest of its customers.

The Company filed the request to be approved with less than statutory notice as required by ORS 757.220. The Company claims "good cause" due to the request being in response to the declared COVID-19 emergency. Staff agrees with the Company's rationale for good cause.

Conclusion

Staff concludes that the Company's tariff modification request is warranted, is in the best interest of customers, and should be granted with less than statutory notice.

PROPOSED COMMISSION MOTION:

Approve Northwest Natural Gas's request for a modification to tariff Sheet C-2, Schedule C to allow for temporary suspension of late charges for unpaid accounts with less than statutory notice.

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Fourth Revision of Sheet C-2
Cancels Third Revision of Sheet C-2

SCHEDULE C MISCELLANEOUS CHARGES AND CREDITS (continued)

DESCRIPTION OF CHARGES and CREDITS:

Late Payment Charge. Customer accounts not paid in full each month may be subject to a late payment charge. For Residential Customers, the late payment charge may be applied to overdue account balances at the time of preparing the subsequent month's bill. For Non-Residential Customers, the late payment charge may be assessed the day after the due date stated on the bill. The late payment charge will not apply to accounts if the balance is less than \$50.00, or to Equal Pay Plan or Time Payment Plan accounts that are current. The application of the \$3.00 minimum late payment charge shown at Sheet C-1 is in accordance with a waiver of OAR 860-021-0126(3) granted to the Company by the Commission effective June 1, 2000 (See NWN OPUC Advice 00-6 and 00-6A). (C)

Charge For Payment Not Honored. A charge will be applied each time a Customer makes a payment on account that is not honored, for any reason, by a bank or other financial institution. (C)

Service Reconnection Charges. A charge will be assessed to restore service to a Customer following a Disconnection of Service under **Rule 11**, or any other applicable Rule or Schedule of this Tariff, or where service is disconnected and Customer subsequently requests service be restored at the same address within twelve (12) Billing Months of the date of Disconnection of Service, ("Temporary Disconnection"). (C)

Before service will be restored, all amounts then due and payable, including the service reconnection charge, and any Customer Charges associated with a Temporary Disconnection must be paid to Company at the Company's offices prior to 6:00 p.m. Monday through Friday, or, upon prior arrangement between Company and Customer, shall be paid to the Company's representative at the time of visit. The service reconnection options are as follows:

Customer Contact with Company	Service Reconnection Options *	Charge
Monday-Thursday 7:00 a.m. to 6:00 p.m.	By 5:00 p.m. of the next day	\$30
	After 5:00 p.m. the next day	\$80
	Same Day after 5:00 p.m.	\$100
Monday-Thursday after 6:00 p.m.	Applicant must call on the next Business Day	
Friday before 3:00 p.m.	By 5:00 p.m. of the next day (Saturday)	\$30
	After 5:00 p.m. the next day (Saturday)	\$80
	Same Day after 5:00 p.m.	\$100
Friday 3:00 p.m. to 6:00 p.m.	By 5:00 p.m. of the next Business Day (Monday)	\$30
	After 5:00 p.m. of the next Business Day (Monday)	\$80
	Friday after 6:00 p.m.	\$100
	Saturday	\$100
Friday after 6:00 p.m.	Applicant must call on next Business Day	

* The time frame for all service reconnection options is subject to change for any cause not reasonably within the Company's control. If the next day is a state-recognized holiday, then reconnection is scheduled for the next Business Day, or Customer can pay the Reconnection Charge applicable to same day and Saturday and Holiday reconnections..

(continue to Sheet C-3)

Issued March 18, 2020
NWN OPUC Advice No. 20-3

Received by OPUC
Filing Center
03/18/2020

Effective with service
upon Commission approval

LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at puc.filingcenter@state.or.us.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF)	UTILITY L.S.N. APPLICATION
<u>Northwest Natural Gas Company</u>)	NO. <u>2256</u>
(UTILITY COMPANY))	(LEAVE BLANK)
TO WAIVE STATUTORY NOTICE.)	

NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.

1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)

Fourth Revision of Sheet C-2, Miscellaneous Charges and Credits relating to Late Payment Charges; change operative language from "will" to "may."

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)

Third Revision of Sheet C-2



3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)

Fourth Revision of Sheet C-2

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:

The Company seeks an effective date of these changes with less than statutory notice in order to be immediately responsive to the rapidly changing economic conditions facing customers in the wake of the COVID-19 pandemic. NW Natural considers this tariff revision to be practical based on the changing economic conditions and to be in the best interest of its customers.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): upon Commission approval

AUTHORIZED SIGNATURE 	TITLE Manager, Regulatory Compliance	DATE March 18, 2020
PUC USE ONLY		
<input checked="" type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE 03/20/2020	
AUTHORIZED SIGNATURE 	DATE 03/20/2020	