

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: April 21, 2020**

REGULAR CONSENT EFFECTIVE DATE April 22, 2020

DATE: April 13, 2020

TO: Public Utility Commission

FROM: Mitchell Moore

THROUGH: Bryan Conway, Michael Dougherty, John Crider, and Matt Muldoon **SIGNED**

SUBJECT: NORTHWEST NATURAL:
(Docket No. ADV 1107/Advice No. 20-4)
Requests update to PUC Or. 25 Rule 10 relating to Emergency Medical
Certificates for residential customers.

STAFF RECOMMENDATION:

Staff recommends that the Public Utility Commission of Oregon (Commission) approve Northwest Natural's (NW Natural, NWN, or Company) filing that updates tariff PUC Or. 25 Rule 10 relating to extension of renewal timeframes for Emergency Medical Certificates for residential customers.

DISCUSSION:

Issue

Whether the Commission should approve NW Natural's proposed revision to its Tariff P.U.C. Or. 25, on less than statutory notice, extending the renewal timeframe for Emergency Medical Certificates for residential customers, with an effective date of April 22, 2020.

Applicable Law

The Commission may approve tariff changes if they are deemed fair, just and reasonable. ORS 757.210. Tariff revisions may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0025. Filings that propose any change in rates, tolls, charges, rules, or

regulations must be filed with the Commission at least 30 days before the effective date of the change. See ORS 757.220; OAR 860-022-0020.

Analysis

Background

On April 7, 2020, NWN filed Advice No. 20-4, requesting an update to its P.U.C. Tariff Or. 25, Rule 10 – Emergency Medical Certificates. The purpose of the filing is to update the tariff sheet to allow the Company to extend the renewal notice timeframe that utilities must provide customers to renew their emergency medical certificates from 15 days to six months.

The Company made a concurrent filing in Docket No. UM 1631 requesting a partial waiver of the rule relating to renewal notice of the emergency medical certificates.

An Emergency Medical Certificate presented by a residential customer to a utility prevents the utility from disconnecting service for non-payment.

NW Natural proposes to make minor changes to Rule 10 to indicate the temporary suspension of the parameters for customers providing medical certificate renewals.

The Company proposes to extend the 15-day renewal timeframe of the certificate to six months. If approved, NW Natural will provide the customer written notice that the medical certificate is expiring and provide a six-month period for the customer to provide a renewed medical certificate.

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.

The Company states the proposed changes to Rule 10 are meant to be temporary, mirroring the expected short-term duration of the requested waiver of OAR 860-021-0410(4). Once the Commission-approved waiver expires, NW Natural will make a new tariff advice filing to remove the temporary changes proposed here.

The Company seeks this flexibility in order to be responsive to the changing economic and social conditions facing customers in the wake of the COVID-19 pandemic. The Company requests the waiver be in effect for an initial period of 60 days. The Company will monitor the situation and continually assess the need to seek any continuance of the waiver.

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Conclusion

Staff is satisfied that the changes are appropriate and reasonable, and recommends the update to Tariff P.U.C. Or. 25, Rule 10 be approved.

PROPOSED COMMISSION MOTION:

Approve NW Natural's proposed revision to its Tariff P.U.C. Or. 25 Rule 10 on less than statutory notice, extending the renewal timeframe for Emergency Medical Certificates for residential customers, with an effective date of April 22, 2020.

NWN ADV 1107 Advice No. 20-4 – Emergency Medical Certification