

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: July 28, 2020**

REGULAR  CONSENT  EFFECTIVE DATE July 29, 2020

**DATE:** July 20, 2020

**TO:** Public Utility Commission

**FROM:** Mitchell Moore

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

**SUBJECT:** NORTHWEST NATURAL:  
(Docket No. ADV 1142/Advice No. 20-7)  
Requests update to Tariff P.U.C. No. 25, relating to customer deposits.

**STAFF RECOMMENDATION:**

Staff recommends that the Public Utility Commission of Oregon (Commission) approve Northwest Natural's (NW Natural, NWN, or Company) filing that revises its Tariff P.U.C. Or. 25 Rule 6 to increase flexibility in applying customer deposits to past due balances, on less than statutory notice, with an effective date of July 29, 2020.

**DISCUSSION:**

Issue

Whether the Commission should approve NWN's proposed revision to its Tariff P.U.C. Or. 25, Rule 6, updating the Company's policy regarding retention of customer deposits, with an effective date of July 29, 2020.

Applicable Law

The Commission may approve tariff changes if they are deemed to be 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

On June 30, 2020, NWN filed Advice No. 20-7, requesting an update to its P.U.C. Tariff Or. 25, Rule 6 – Deposits and Other Security. The purpose of the filing is to provide an update to the tariff sheet to provide flexibility in applying customer deposits to past due balances sooner than the one-year timeframe indicated by the Rule.

In the wake of the COVID-19 public health emergency and the economic impacts faced by its customers, the Company seeks more flexibility in assisting customers with managing their energy bills.

In its application, NW Natural states that it is in the process of proactively reaching out to customers who are behind on their bills or are concerned about their account. The Company will inform customers about the various forms of payment assistance and options – providing information about payment plans, renegotiation of current payment plans, bill payment extensions and low income assistance availability.

This update will provide an additional tool for the Company to help customers address past-due accounts. Currently, Rule 6 of the tariff adheres to the 12-month time period for holding deposits to establish satisfactory credit, consistent with the limit specified in OAR 860-021-0215. However, the Company's Rule 6 does not allow for an earlier application of existing deposits to a customer's account. The proposed change will provide the ability to apply the customer's deposit earlier than one year.

The tariff changes proposed in this filing will have no impact on customer rates.

### Conclusion

Staff is satisfied that the changes are appropriate and reasonable in light of the economic uncertainty many customers are experiencing in the wake of the COVID-19 pandemic, and recommends approval of the update to Tariff P.U.C. Or. 25, Rule 6.

### **PROPOSED COMMISSION MOTION:**

Approve Northwest Natural's filing that revises its Tariff P.U.C. Or. 25 Rule 6 to increase flexibility in applying customer deposits to past due balances, on less than statutory notice, with an effective date of July 29, 2020.