



Oregon

Kate Brown, Governor

Public Utility Commission

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July 28, 2020



BY EMAIL

Northwest Natural Gas Company, dba NW Natural

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RE: Advice No. 20-7

At the public meeting on July 28, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1142. The Staff Report, a receipted copy of the sheets in your advice filing, and a signed LSN are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

**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.

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

First Revision of Sheet RR-6.1
Cancels Original Sheet RR-6.1

GENERAL RULES AND REGULATIONS

(continued)

Rule 6. Deposits and other Security: General (continued).

Except where provided otherwise in this or any other applicable Schedule of this Tariff P.U.C. Or. 25, deposits will be held by the Company for one Year. At the end of one Year, the Company will review the account to determine if Customer has met the conditions for establishing satisfactory credit, which are described in **Rule 2**. If a Customer has not established satisfactory credit, the deposit may be held on the account for a subsequent Year, with interest. Any interest accrued for the prior Year will be applied as a bill credit on the Customer's next regular monthly bill.

If Customer has met the conditions for establishing satisfactory credit, the deposit plus accrued interest will be refunded or credited to Customer. If there are any other current or prior accounts for such Customer, the Company may review such accounts to determine if there is any unpaid past-due balance owing to the Company. Prior to refunding or crediting a deposit amount, the Company may first apply the refundable deposit and accrued interest, to such past due amounts. Any remaining balance shall be refunded or credited to the account for which the deposit was held.

The Company may provide other arrangements for the refunding and/or crediting of deposits under this rule where good cause exists.

(N)
(N)

Upon voluntary termination of service, any deposit amount held on account of a Customer shall be refunded or credited to the Customer in the manner set forth in **Rule 16**.

The Company's acceptance of a deposit or other security shall not relieve an Applicant or Customer from complying with the Rules and Regulations established by the Commission, including but not limited to the prompt payment of bills and the Disconnection of Service for non-payment.

(continue to Sheet RR-6A)

Issued June 30, 2020
NWN OPUC Advice No. 20-7

Received
Filing Center
JUN 30 2020

Effective with service on
and after July 29, 2020

LESS THAN STATUTORY NOTICE APPLICATION

ADV 1142
Advice No. 20-7

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
Northwest Natural Gas Company) NO. 2260
(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)

First Revision of Sheet RR 6-1 - General Rules and Regulations - Rule 6 - Deposits and Other Security:General. Changes reflect the proposed language to provide flexibility in applying customer deposits sooner than the one-year timeframe currently outlined in the rule.

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

Original Sheet RR 6-1


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

First Revision of Sheet RR 6-1

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:

The Company seeks changes to provide flexibility in applying customer deposits sooner than the one-year timeframe currently outlined in the rule. Adding the flexibility to apply deposit balances to customers looking to bring their accounts current, will enable the Company to offer another tool for customers in need of solutions to address past due balances. The Company seeks this change with less than statutory notice in order to be immediately responsive to the changing economic and social conditions that our customers are facing. NW Natural considers this tariff revision to be practical based on these changing conditions and to be in the best interest of its customers.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): July 29, 2020

AUTHORIZED SIGNATURE <i>/s/ Natasha Soares</i>	TITLE Manager, Regulatory Compliance	DATE June 30, 2020
PUC USE ONLY		
<input checked="" type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE July 29, 2020	
AUTHORIZED SIGNATURE 		DATE July 28, 2020