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nwnatural.com

June 30, 2020

NWN OPUC Advice No. 20-7

**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: Rule 6 – Deposits and Other Security**

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 on July 29, 2020.

**NW Natural respectfully requests the proposed tariff sheet become effective with less than statutory notice on July 29, 2020; an L.S.N. is also enclosed.**

First Revision of Sheet RR 6-1	General Rules and Regulations	Rule 6 – Deposits and Other Security: General
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**Purpose**

The purpose of this filing is to add language to NW Natural's Rule 6 – Deposits and Other Security to provide flexibility in applying customer deposits sooner than the one-year timeframe currently outlined in the rule. In the wake of the COVID-19 public health emergency and the economic impacts faced by our customers, the Company seeks more flexibility in assisting customers with managing their energy bills. 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.

NW Natural respectfully requests these changes become effective on July 29, 2020, with less than statutory notice. As allowed by ORS 757.220, good cause must be shown for requested changes less than 30 days after the request is filed.<sup>1</sup> NW Natural considers this tariff revision to be practical based on the changing social and economic conditions caused by the public health emergency and to be in the best interest of its customers.

**Background**

Unprecedented economic and social impacts associated with the COVID-19 public health emergency continue to affect our customers. Oregon is experiencing record-level unemployment

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<sup>1</sup> ORS 757.220 states “the commission, for good cause shown, may allow changes without requiring the 30 days’ notice by filing an order specifying the changes to be made and the time when they shall take effect.”

due to the pandemic. Providing customers with flexibility and options when it comes to their energy bills during these challenging times is a priority for the Company.

NW Natural is in the process of proactively reaching out to customers who are behind on their bills or are concerned about their account. In our discussions with customers, the Company will inform them 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. An additional tool we would like to offer is applying existing deposits to customer balances. Currently, Rule 6 of our tariff contemplates the 12-month time period for holding deposits to establish satisfactory credit, consistent with 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.

NW Natural proposes including the sentence, “The Company may provide other arrangements for the refunding and/or crediting of deposits under this rule where good cause exists.” Such language would provide flexibility to apply customer deposits earlier than the 12-month time period currently contemplated, affording a useful tool to help customers address past-due balances.

**Proposed Changes**

NW Natural proposes to add language to Rule 6 to allow for an earlier application of deposit balances. If adopted, the Company would be able to assist customers with past-due balances by applying existing deposits to their accounts earlier than the 12-month time period currently contemplated in Rule 6. Providing additional flexibility for the application of deposits is expected to help customers who are behind on their bills or are concerned about their account, creating a positive impact for customers now and in the future.

**Conclusion**

NW Natural respectfully requests that the Commission approve this tariff change to become effective with less than statutory notice on July 29, 2020.

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  
250 SW Taylor Street  
Portland, Oregon 97204  
Fax: (503) 220-2579  
Telephone: (503) 610-7330  
[eFiling@nwnatural.com](mailto:eFiling@nwnatural.com)

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Respectfully submitted,

*/s/ Natasha Siores*

Natasha Siores  
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# NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

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

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## 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

Effective with service on  
and after July 29, 2020

# 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](mailto:puc.filingcenter@state.or.us).

## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF  Northwest Natural Gas Company _____ (UTILITY COMPANY)	) ) ) )	UTILITY L.S.N. APPLICATION  NO. _____ (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 Siores</i>	TITLE Manager, Regulatory Compliance	DATE June 30, 2020
PUC USE ONLY		
<input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE	
AUTHORIZED SIGNATURE	DATE	