



250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

April 7, 2020

NWN OPUC Advice No. 20-4

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 10—Emergency Medical Certificates – Residential Customers

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 upon Commission approval.

NW Natural respectfully requests the proposed tariff sheet become effective upon Commission approval. In the event the Commission’s approval and the effective date occur within 30 days, an L.S.N. is also enclosed

First Revision of Sheet RR-10	General Rules and Regulations	Rule 10 – Emergency Medical Certificates – Residential Customers
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Purpose

The purpose of this filing is to provide temporary minor modifications to the tariff sheet listed above that would allow NW Natural discretion to extend the renewal timeframe for customer medical certificates in response to the COVID-19 public health emergency.

NW Natural has made a filing in docket UM 1631 for a partial waiver of OAR 860-021-0410(4), which provides the parameters for the duration of emergency medical certificates and requires utilities to provide notice to customers when emergency medical certificates are due to expire. In its partial waiver request, the Company requested to extend the medical certificate renewal timeframe in OAR 860-021-0410(4) from 15 days to six months. Should the Commission approve our waiver request, the enclosed proposed temporary tariff changes are necessary to accommodate the extension of the renewal timeframe.

The Company seeks this flexibility in order to be immediately responsive to the rapidly changing economic and social conditions facing customers in the wake of the COVID-19 pandemic and respectfully requests approval as soon as possible. As allowed by ORS 757.220, good cause must

be shown for requested changes less than 30 days after the request is filed.¹ NW Natural considers this tariff revision to be practical based on the changing social and economic conditions and to be in the best interest of its customers.

Background

In a separate filing in docket UM 1631, NW Natural has requested a partial waiver of OAR 860-021-0410(4) to extend the 15-day renewal timeframe to six months to provide flexibility to customers in renewing medical certificates during this uncertain time caused by the COVID-19 public health emergency and related stay-at-home and social distancing measures. NW Natural will provide the customer written notice that the medical certificate is expiring and provide a six-month extension for the customer to provide a renewed medical certificate.

If the Commission approves the requested partial waiver, the proposed temporary tariff changes enclosed are necessary to accommodate the extension of the renewal timeframe.

Proposed Changes

NW Natural proposes to make minor changes to Rule 10 to indicate the temporary suspension of the parameters for customers providing medical certificate renewals; these changes are necessary should the Commission approve the Company's requested partial waiver in docket UM 1631. Should the Commission not approve NW Natural's request, the Company will withdraw this tariff advice filing.

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

Conclusion

NW Natural respectfully requests that the Commission approve this tariff change to become effective upon Commission approval.

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.

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

¹ 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."

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Respectfully submitted,

/s/ Natasha Siores

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GENERAL RULES AND REGULATIONS

(continued)

Rule 10. Emergency Medical Certificates – Residential Customers.

Customer must notify Company if a medical emergency exists. A medical emergency does not excuse a Customer from paying delinquent and ongoing charges.

The Company will not disconnect Residential Service for nonpayment if the Customer submits an emergency medical certificate from a qualified medical professional stating that disconnection would significantly endanger the physical health of the Customer or a member of the Customer's household.

A qualified medical professional is defined as a licensed physician, nurse practitioner, or a physician's assistant authorized to diagnose and treat the medical condition described without direct supervision by a physician.

Customer shall enter into a Time Payment Agreement as described in **Rule 9** of this Tariff, or on such other terms as the Company deems reasonable, within twenty (20) days of filing the medical certificate with the Company. If the Customer fails to enter into a Time Payment Agreement, or if the Customer fails to abide by the terms of a Time Payment Agreement, service may be disconnected in accordance with **Rule 11**, following notice to the Commission's Consumer Services Section.

An emergency medical certificate will be valid only for the length of time the health endangerment is certified to exist, but no longer than six (6) months for non-chronic illnesses and no longer than twelve (12) months for chronic illnesses, without renewal.

A medical certification given to Company verbally must be confirmed in writing within fourteen (14) calendar days by the qualified medical professional prescribing medical care. **

(N)

The Company may verify the accuracy of any emergency medical certificate submitted under this Rule.

The Company will provide written notice to Customer of the upcoming expiration of a medical certificate at least fifteen (15) days prior to the expiration date, unless the medical certificate is renewed with the Company before that day arrives. **

(N)

**** Effective with the approval date indicated below, the asterisked terms in this Rule 10 are temporarily suspended in response to the COVID-19 public health emergency.**

(N)

(N)

(continue to Sheet RR-11)

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 <u>Northwest Natural Gas Company</u> (UTILITY COMPANY) TO WAIVE STATUTORY NOTICE.))))	UTILITY L.S.N. APPLICATION NO. _____ (LEAVE BLANK)
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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-10, General Rules and Regulations, Rule 10 Emergency Medical Certificates - Residential Customers. Changes reflect the proposed temporary suspension of rules relating to the timeframe in which customers may provide medical certificate renewal information.

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-10

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

First Revision of Sheet RR-10

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:

The Company seeks changes to reflect the temporary suspension of rules relating to the timeframe in which customers may provide medical certificate renewal information with less than statutory notice in order to be immediately responsive to the rapidly changing economic and social 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 and social 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 April 7, 2020
PUC USE ONLY		
<input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE	
AUTHORIZED SIGNATURE	DATE	