



e-FILING REPORT COVER SHEET

COMPANY NAME:

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION? No Yes If yes, submit a redacted public version (or a cover letter) by email. Submit the confidential information as directed in OAR 860-001-0070 or the terms of an applicable protective order.

Select report type: RE (Electric) RG (Gas) RW (Water) RT (Telecommunications)
RO (Other, for example, industry safety information)

Did you previously file a similar report? No Yes, report docket number:

Report is required by: OAR
Statute
Order

Note: A one-time submission required by an order is a compliance filing and not a report (file compliance in the applicable docket)

Other
(For example, federal regulations, or requested by Staff)

Is this report associated with a specific docket/case? No Yes, docket number:

List Key Words for this report. We use these to improve search results.

Send the completed Cover Sheet and the Report in an email addressed to PUC.FilingCenter@state.or.us

Send confidential information, voluminous reports, or energy utility Results of Operations Reports to PUC Filing Center, PO Box 1088, Salem, OR 97308-1088 or by delivery service to 201 High Street SE Suite 100, Salem, OR 97301.

February 19, 2021

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: RG 63 – 2020 Annual Billing Error Report

Northwest Natural Gas Company, dba NW Natural, submits its annual billing error report for the calendar year 2020 pursuant to OAR 860-021-0170(4), stating that there were two reportable billing errors that occurred and were reported to Commission Consumer Staff in calendar year 2020.

In compliance with OAR 860-021-0170(4), the following summarizes the billing errors that were reported in 2020:

1. In January 2020, it was discovered that Smart Energy program charges were not being assessed for January. The voluntary Smart Energy program charges stopped being assessed due to an inappropriate end date of 1/1/2020 coded into the Smart Energy program control file in our CIS system. Quick action from our Contact Center customer service representative who detected the error and our Billing and IT teams limited the error to the bills issued on January 2nd and 3rd. To correct and prevent future errors, the Smart Energy program file end date has been extended to 2076, which will be well after our current legacy CIS system will be retired. Total number of impacted customers was 6,342. This billing error was reported to Consumer Staff on January 13, 2020.
2. In November 2020, we discovered an error in new CIS code that went into production November 11, 2020 to fix a minor bill proration rounding issue. The new code had a flaw that resulted in one side of the prorated therms to be calculated incorrectly - the first period of gas usage was calculated correctly but the second period gas usage was not because it included therms for the entire bill period. This issue only impacted the bill batch run on November 11, 2020 and was identified early enough in the process to prevent incorrect paper bills from being issued to customers, but not paperless bills. To correct and prevent future errors, the errant code was replaced, passed testing and promoted into production. Additionally, a new bill exception was created to automatically catch proration split errors. We also evaluated our ability to delay customer notice of paperless bills until later in the day to provide time to identify errors

before they are released but this has not yet been implemented. Total number of impacted customers, all of whom were on paperless billing, was 4,270. This billing error was initially reported to Consumer Staff on November 13, 2020, with the final report provided on November 20, 2020.

Please address correspondence on this matter to me with copies to the following:

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Rates & Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204
Phone: 503-610-7330
Fax: 503-220-2579
E-mail: eFiling@nwnatural.com

Please do not hesitate to call if you have questions or desire further information.

Sincerely,

/s/ Natasha Siores

Natasha Siores
Manager, Rates & Regulatory Affairs