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October 6, 2011

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
550 Capitol Street, N.E., Suite 215
P.O. Box 2148
Salem, Oregon 97308-2148

Attn: Filing Center

Re: Docket UM 1218
Request for Exclusion from the B1 Service Quality Measure for Billing
Accuracy for Bill Message Redesign Project

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), submits herewith a request for approval for an exclusion from the B1 Service Quality Measure for Billing Accuracy (B1 SQM) for its bill message redesign project, in accordance with Section VII(C) of the B1 SQM approved by the Commission in Docket UM 1218, OPUC Order No. 05-1005.

The purpose for the bill message redesign project is to simplify the bill message programming code to add more flexibility and efficiency to the bill message process. Today, bill messages are generated with hard code programming in the bill select, bill calculation and bill print programs. The project involves replacing the hard code process with a control file process. The use of control files will allow bill messages to be generated more efficiently, and for any changes or additions to the bill message library to occur more quickly. While we do not expect the code change to cause a problem with messages displayed on current bills, as with any programming change, there could be issues that arise that the Company could not reasonable anticipate.

In addition, the transition from hard code to control files will affect historical bill statements when viewed on line in the HTML format. A customer that wants to view a historical bill including the correct bill messages will be able to do so if they choose the ".pdf" view. If the customer views the bill in HTML format, the bill messages that were included on the original bill will not be displayed on the historical bill statements. The Company will display a message on such historical bills until all historical bills issued under the old code have cycled through. We currently retain thirteen months of historical bills on our web site. The message will read:

"The messages intended for this space may not display correctly in this view. To see the actual bill messages, please view your bill as a pdf by clicking the link at the top of the page".

For the reasons stated above, the Company hereby requests that any billing errors that may arise as a direct result of the bill message redesign project be excluded from the definition of Bill Error as defined in the B1 SQM (see Section IV) and be excluded from the calculation of the Monthly Billing Accuracy Ratio (see Section V) for ninety (90) days following the implementation date of the programming changes associated with the project. The planned implementation date is October 31, 2011. The requested exclusion period is October 31, 2011 through February 1, 2012.

The Company respectfully requests that a decision on the Company's request be issued as soon as reasonably possible. The Company is prepared to meet with staff at any time to provide additional information or respond to specific questions regarding the bill message redesign project in general.

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

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

Sincerely,

/s/ Onita King

Onita R. King
Rates & Regulatory Affairs

cc: Dave Williams
C. Alex Miller
Barbara Volk
Mark Thompson
Chuck Muehleck
Barry Stewart
Pam Kemper
Darcy Noxon

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