

Rates and Regulatory Affairs
Facsimile: 503.721.2532



August 17, 2006

VIA ELECTRONIC MAIL

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

Attn: Vikie Bailey-Goggins

Re: Docket No. UM 1218
Amended Request for Exclusion from the B1 Service Quality Measure for Billing Accuracy for Automated Meter Reading (AMR) Project.

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), submits herewith an amended request for approval for an exclusion from the B1 Service Quality Measure for Billing Accuracy (B1 SQM) for its Automated Meter Reading (AMR) project, as provided in Section VII(C) of the B1 SQM approved by the Commission in Docket UM 1218, OPUC Order No. 05-1055. This amended request is made following numerous discussions between the Company and the OPUC staff.

The Company's April 24, 2006 request is amended to establish a schedule under which the B1 SQM exclusion would apply on a district specific basis, as follows:

District	Target Start	Target End [1]	QA Period End [1]	B1 Exclusion Period [2]
The Dalles	Jun 2006	July 2006	Aug 2006	June 2006 – Oct 30, 2006
Eugene	Jul 2006	Oct 2006	Nov 2006	July 2006 – Jan 31, 2007
Albany	Oct 2006	Jan 2007	Feb 2007	Oct. 2006 – Apr 30, 2007
Portland (non-JMR)	Nov 2006	April 2007	May 2007	Nov 2006 – Jul 31, 2007
Salem (non-JMR)	Jan 2007	Feb 2007	Mar 2007	Jan 2007 – May 30, 2007
Astoria	TBD	Mar 2007	Apr 2007	Ends Jun 30, 2007
Lincoln City	TBD	April 2007	May 2007	Ends Jul 31, 2007

[1] Assumes a month-end "End" date

[2] These dates are subject to change if the Target Start or End dates change. In such event, the exclusion period will extend to the end of the 2nd complete billing cycle following the installation date of the last AMR device within that district.

For each district, there are five (5) process steps that will be completed within the respective exclusion period: 1) install AMR device; (2) perform QA (run simultaneous manual meter reads with AMR meter reads) in the first billing month following the AMR device installation; (3) establish mobile meter read route for each completed meter; (4) when all meters in the district are converted and QA'd, optimize mobile meter read routes for all converted meters in the entire district; and (5) complete two full cycles of billings following the optimization of the meter read routes.

The proposed exclusion periods vary due to the number of meter conversions associated with each district. The three largest districts (in terms of meter conversions) are Portland, Eugene, and Albany. The Eugene and Albany districts have 34,771 and 37,315 meter conversions, respectively, with requested exclusion periods that span 7 months each. The Portland district has 49,443 meter conversions, 12,128 more than the two other largest districts, with a requested exclusion period that spans 9 months. The longer exclusion period for Portland is directly associated with the larger number of meter conversions required. According to the installation plan established by the thirty-party selected to complete the installations, the maximum number of installations that can be completed in a one month period is between 10,000 and 12,000.

A comprehensive Implementation Plan for the project was filed with the Company's original request on April 24, 2006, and includes among other things, a detailed description of the AMR installation plan, quality assurance plan, and communication plan is enclosed in support of this request.

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 Implementation Plan or the AMR project in general.

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

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

Sincerely,

/s/ Onita R. King

Onita R. King, Manager
Tariffs & Regulatory Compliance

cc: Grant Yoshihara
Susan Dodge
Chuck Muehleck
Randy Trautman
Kay Steele

OPUC Staff:
Judy Johnson
Bonnie Tatom
Deborah Garcia

COMMUNICATIONS PLAN



PROJECT COMMUNICATIONS

Type of Communication	Information Needs	Stakeholder	Supplier	Format	Schedule
Project Kickoff	General information regarding the project: vendor selection process and decision, responsibility matrix, schedule, installation process, HR impacts, and communications.	Project Leads, Process Owners, Sponsors, Stakeholders, Steering Committee, Vendor Project Manager	Project Manager	Meeting	March 2006
Project Status	Planning, progress, and issues review	Project Manager and some Leads	Vendor Project Manager	Meeting	Weekly
Project Status	Planning, progress, and issues review	Project Leads	Project Manager	Meeting	Bi-Weekly
Sub-Team Meetings	Status and issues review.	Project Team	Project Leads	Meeting	As Needed
I/T Capital Status	High-level project status.	CIO, I/T Management Team	Project Manager	Meeting	Bi-Weekly
Large Capital Project Status	High-level project status.	Large Capital Steering Committee	Project Manager	E-mail	Monthly
Project Closure	Review of project cost, schedule, and scope. Discussion on what went right and what could have been improved on. Formal closure for the project.	Project Leads, Process Owners, Sponsors, Steering Committee, Vendor Project Manager	Project Manager	Meeting	End of Project

COMMUNICATIONS PLAN



EXTERNAL COMMUNICATIONS

STAKEHOLDER (individual or group)	PURPOSE What is their stake or interest?	OUTCOME What do they need their communications to enable or accomplish?	METHODS How do they communicate or best receive information?	FREQUENCY How often do they need to receive and/or provide information?	WHO Who is responsible for this communication? This may mean writing, delivering, approving and so indicate who does what.
Customers	*Best customer service * Security	* Reassure them about safety of process *Help them understand why this benefits them	Comfort Zone	Starting in March, repeated throughout conversion process	Claire/June Taylor, Comfort Zone editor
Customers	*Best customer service * Security	* Reassure them about safety of process *Help them understand why this benefits them	Bill messages and bill stuffers	Month before conversion begins in each district	Claire/Cory Beck
Customers	*Best customer service * Security	Reassure them about safety of process *Help them understand why this benefits them	News media: targeted media outreach	Month before conversion begins in each district	Public Relations team
Customers	* Security	*How to help company access the meter	*Personal visits; leave door hanger/sign; phone calls	After unsuccessful attempt at accessing meter	*Visits, phone calls, leave door hanger – contractor; *Door hanger/sign production – Communication Services
Customers	*Best customer service	*Help them understand why this benefits them	Internet site	Throughout conversion process	Communication Services
Local governments	*Security	*Response to questions from citizens	*Letters to city managers, public works officers	Month before conversion begins in each district	Communication Services
Public safety groups	*Security	*Response to questions from citizens	* Insert in mailings to police, fire organizations *Visits to police, fire organizations, other groups if advisable	*Once in 2006; additional if needed; *Month before conversion begins in each district	*Communication Services *Randy Trautman

COMMUNICATIONS PLAN



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EMPLOYEE IMPACT TEAM

STAKEHOLDER (individual or group)	PURPOSE What is their stake or interest?	OUTCOME What do they need their communications to enable or accomplish?	METHODS How do they communicate or best receive information?	FREQUENCY How often do they need to receive and/or provide information?	WHO Who is responsible for this communication? This may mean writing, delivering, approving and so indicate who does what.
Meter readers, meter reading clerks	They are losing their current jobs and will need to move into other jobs under the provisions of the Joint Accord.	<ul style="list-style-type: none"> *To understand benefits of AMR to company/customer. *To understand the timing and process of AMR transition. * To understand the opportunities under the Joint Accord for moving into other jobs; decisions of the EIT, etc. affecting priority hiring, bumping, etc. * To know what resources are available to them. * Job openings, application deadlines, special assignments, etc. 	<ul style="list-style-type: none"> *One on ones with supervisors, stewards, other resources *Executive, manager presentations *Regular tailgaters *Letters/memos *Technical documents *Postings on display kiosks (e.g. print Hub site information) *E-mails with links to Hub site *Dedicated Hub site *Computer instruction as needed 	<ul style="list-style-type: none"> *At milestones (signing of contract with vendor; decisions points on bidding; when timeline and schedule for converting meters is determined) *At regular intervals based on continued EIT meetings. 	<ul style="list-style-type: none"> *EIT determines content and timing *Delegates Claire/Carol to write *Full EIT or 1 or 2 designated approvers from EIT (depending on nature of communications)
Meter reader supervisors	They are supervising a group of people who will be phased out of present work and moving into other jobs. At best, their jobs will change. At worst, they might lose their jobs.	<ul style="list-style-type: none"> * To understand benefits of AMR to company/customer. *To understand the timing and process of AMR transition. *To know as early as possible decisions made 	<ul style="list-style-type: none"> *One on ones with managers *Executive/manager presentations *Letters *Technical documents *E-mails *Dedicated Hub site. 	<ul style="list-style-type: none"> *At milestones (signing of contract with vendor; decisions points on bidding; when timeline and schedule for converting meters is 	<ul style="list-style-type: none"> *EIT determines content and timing *Delegates Claire/Carol to write *Full EIT or 1 or 2 designated approvers from EIT (depending on nature of

COMMUNICATIONS PLAN



		<p>with respect to their jobs.</p> <ul style="list-style-type: none"> * To understand the opportunities under the Joint Accord for their employees * To know what resources are available to their employees. * To know what resources are available to them with respect to their own careers. 		<p>determined)</p> <ul style="list-style-type: none"> *At regular intervals based on continued EIT meetings. 	communications)
District, Center Managers	Some of them are supervising meter readers who will be phased out of present work and moving into other jobs.	<ul style="list-style-type: none"> *To understand the timing and process of AMR transition. *To know as early as possible decisions made with respect to their jobs. * To understand the opportunities under the Joint Accord for their employees * To know what resources are available to their employees. 	<ul style="list-style-type: none"> *Executive/manager presentations *Letters *Technical documents *E-mails *Dedicated Hub site. 	<ul style="list-style-type: none"> *At milestones (signing of contract with vendor; decisions points on bidding; when timeline and schedule for converting meters is determined) *At regular intervals based on continued EIT meetings. 	
All stewards	Some of them represent meter readers. Others represent employees whose jobs may be affected by AMR or who may be affected by Joint Accord provisions designed to help meter readers.	<ul style="list-style-type: none"> *To understand the timing and process of AMR transition. *To know as early as possible decisions made with respect to their jobs. * To understand the opportunities under the Joint Accord for BU employees * To know what 	<ul style="list-style-type: none"> *Executive/manager presentations *Letters *Technical documents *E-mails *Dedicated Hub site. 	<ul style="list-style-type: none"> *At milestones (signing of contract with vendor; decisions points on bidding; when timeline and schedule for converting meters is determined) *At regular intervals based on continued 	

COMMUNICATIONS PLAN



		resources are available to BU employees.		EIT meetings.	
Billing clerks, garage mechanics, service techs, schedulers, CAS, others whose jobs intersect meter reading	The volume and quantity of their work could change. This may affect the number of positions in a work group.	<ul style="list-style-type: none"> *To understand benefits of AMR to company/customer * To understand the timing and process of AMR transition and how it affects their work groups. * To understand the opportunities under the Joint Accord for moving into other jobs. * To know what resources are available to them. * Job openings, application deadlines, etc. 	<ul style="list-style-type: none"> *One on ones with supervisors, other resources *Executive, manager presentations *Regular tailgaters *Letters *Technical documents *Bulletin board postings *E-mails? *Dedicated Hub site 	<ul style="list-style-type: none"> *At milestones (signing of contract with vendor; decisions points on bidding; when timeline and schedule for converting meters is determined) *At regular intervals based on continued EIT meetings. 	<ul style="list-style-type: none"> *EIT determines content and timing *Delegates Claire/Carol to write * Full EIT or 1 or 2 designated approvers from EIT (depending on nature of communications)
Communications	They must be prepared to respond to employee needs, including: rumor response; Hub site updates.	*To be kept informed of decisions that might require responses and be ready to respond appropriately.	E-mails, phone updates.	At milestones or otherwise as needed.	Project Manager Team Leads EIT members
Human Resources	They must be prepared to respond to employee needs and to keep employees updated about permanent and temporary positions.	<ul style="list-style-type: none"> *They need to know any personnel policies, job openings, special assignments, etc. they can pass on to meter readers. *They need to understand and advise meter readers about Joint Accord provisions and 	*In person information; e-mails; phone updates.	Whenever there's a decision or a change.	Department managers EIT JAC

COMMUNICATIONS PLAN



		how they affect their jobs.			
All employees	They care about customers and their fellow employees, and how well this is rolled out could affect their morale. They also will be looking to the AMR project as an indicator of how NW Natural will be managing similar changes that may affect their jobs.	<ul style="list-style-type: none"> *To understand benefits of AMR to company/customer. *To understand how their jobs may change as a result of AMR. *To sustain trust in the provisions of the Joint Accord and in management's commitment to employees. 	<ul style="list-style-type: none"> *Liaison Program *Other face-to-face meetings *Hub/Hot Off Hub articles * Blue Flame *Dedicated Hub site 	<ul style="list-style-type: none"> *At milestones *Periodic updates 	<ul style="list-style-type: none"> *EIT determines content and timing *Delegates Claire to write. * 1 or 2 designated approvers from EIT
JAC	They oversee interpretations of the Joint Accord.	<ul style="list-style-type: none"> *To make sure that the Joint Accord is being interpreted in a way that's consistent with JAC members' understanding. 	<ul style="list-style-type: none"> *Reports/written documents by Diana and Randy 	<ul style="list-style-type: none"> *At milestones *Periodic updates 	<ul style="list-style-type: none"> *EIT determines content and timing *Delegates Claire/Carol to write *Full EIT or 1 or 2 designated approvers from EIT (depending on nature of communications)
All supervisors and managers	They will have a role in hiring meter readers and others displaced by AMR	<ul style="list-style-type: none"> *To make sure they understand their responsibilities with respect to hiring displaced meter readers *To make sure they communicate with HR about all positions, including special assignments, so these positions will be available to meter 	<ul style="list-style-type: none"> *Communications from HR 	<ul style="list-style-type: none"> *Throughout the process 	<ul style="list-style-type: none"> *Human Resources

COMMUNICATIONS PLAN



		readers.			
Executives	Will be communicating about AMR, other corporate initiatives	Need latest information to be informative, give consistent message to employees	*Regular updates at Exec. Staff meetings by Communication. *Special folder on Q drive for officers, to keep them updated in advance of liaison visits.	*Throughout process, whenever they visit a center or district	*Based on decisions at EIT meetings; other AMR project decisions; other AMR communications.



NW Natural

AMR PROJECT
Implementation Plan

April 2006

Objective

Approximately 166,000 meters in the Oregon non-JMR area will be converted to Automated Meter Reading (AMR) over a 12-month period from May 2006 through May 2007. There will be approximately 60,000 installs in the Portland area, with the remaining 106,000 installs in the districts: The Dalles, Astoria, Lincoln City, Salem Non-JMR, Albany, and Eugene.

The AMR modules (ERTs) will be purchased from Itron. In addition, NW Natural selected Itron to complete the installations of the AMR modules. Itron has extensive experience with AMR installations using their equipment throughout the United States.

Installation Plan

- Installation Schedule

The target installation schedule is:

	<u>Target Start Date</u>	<u>Target End Date</u>
- Vancouver	Week of May 22 nd	November 2006
- Portland (Non-JMR)	November 2006	April 2007
- The Dalles	June 2006	July 2006
- Eugene	July 2006	October 2006
- Albany	October 2006	January 2007
- Salem (Non-JMR)	January 2007	February 2007
- Astoria	TBD	March 2007
- Lincoln City	TBD	April 2007

However, the target installation schedule could be revised as the project progresses.

- Facilities

Itron will obtain two facilities that will be used for staging and inventory management – one in Vancouver and one in Albany. All customer service activities will be centralized in one of these facilities. Additional short-term facilities will be obtained to handle installations in the outlying areas (i.e., Astoria, The Dalles, and Lincoln City).

- Installation Plan
 - Itron will provide the staff required to complete the installations, schedule and track the installations, manage the inventory, manage the staff, and for project management.
 - Itron will provide the vehicles required to complete the installations. Each vehicle will have wording on the side of the vehicle that indicates that they are NW Natural contractors.
 - Itron will ensure field deployment personnel comply with NW Natural security, background, and mandatory drug and alcohol prevention protocols. Results will be provided to NW Natural for review.
 - Itron will ensure that field deployment work is completed in compliance with all applicable OSHA and DOT (Operator Qualification) standards. Results will be provided to NW Natural for review.
 - Field employees will be outfitted with uniforms that state they are NW Natural contractors. In addition, the field employees will carry NW Natural identification cards provided by NW Natural with their photos.
 - Itron will train and qualify the field deployment personnel based on the job requirements for each employee. A combination of classroom training, written testing, and practical performance testing will be pursued. NW Natural will provide any OQ certification train the trainer training required.
 - NW Natural will perform all necessary repairs to enable the safe installation of an AMR module. Itron will not install AMR modules where safety and reliable operation cannot be assured. When an abnormal condition is discovered, Itron will return the work order to NW Natural for follow-up and completion.
 - Itron will resolve work order data exceptions in a timely and efficient manner. Examples of exceptions are:
 - Duplicate meter module or meter numbers
 - Meter number mismatches
 - Meter type exceptions
 - High-low exceptions
 - Timed-out work orders
 - Dial mismatch
 - Drive rate mismatch
 - Meters found in field but not in work order file.
 - Work orders returned to NW Natural for completion
 - Meter module to meter mismatch

- Itron will provide weekly reports as follows:
 - Installation report that details the number of meter modules installed by location/office
 - Installation variance report
 - Quantity of meters that required screw tapping
 - Quality assurance inspections and results
 - Inventory management including meter modules received, returned and any other pertinent inventory data (i.e., NW Natural provided materials or property necessary to the installation services)
 - Field claims status report
 - Route saturation status
 - Route acceptance status
 - Returned To Utility (RTU) report

NW Natural will review all reports with Itron on a timely basis and complete required follow-up.

- NW Natural will produce the following monthly system performance reports:
 - CIS route saturation report
 - AMR Read Report –Meter reading performance report indicating the number of AMR module reads attempted and successful reads by route.
 - Read to Bill Report – Percent of meters billed in which an AMR read was obtained. Estimates should not be excluded.

NW Natural will review all reports with Itron on a timely basis and complete required follow-up.

- Itron will provide a customer contact point to handle NW Natural customer inquiries related to the field deployment effort. This contact will be available during the time field deployment personnel are performing their work. NW Natural will receive monthly reports on calls segregated by claims, appointments, and contacts.
- NW Natural will complete the installs on meters that cannot be installed with AMR modules due to meter type or meter condition.
- Meter Access Procedures
 - Itron will “cold-call” at each premise and attempt access to the meter for installation.

- If the installer cannot gain access to the meter (inaccessible), a NW Natural supplied communication (door hanger) with the Installer contact information will be left in order to make an arrangement for access.
 - If a work order cannot be completed due to an unsafe condition (i.e., damaged or deteriorated meter service, broken index screws, etc.), the work order will be returned to NW Natural for follow-up and completion.
 - On a second occasion, Itron will perform an after hours “cold call” of the premise in an attempt to complete the work. If Itron still cannot gain access to the meter, another door hanger will be left.
 - If access cannot be obtained via “cold-calls”, Itron will attempt to contact the customer via telephone to gain access to the meter.
 - On a third occasion, Itron will call for an appointment and then visit the premise in an attempt to complete the work. If Itron cannot gain access to the meter, another door hanger will be left.
 - If ten business days after Itron delivers the third written attempt, the work order has not been completed and an appointment has not been established, the work order will be returned to NW Natural for follow-up and completion.
- Meter Module Installation Procedures
 - 1) If a meter is inaccessible, a customer door hanger will be completed and attached to the customer’s front door, as applicable.
 - 2) If the meter is accessible, the installer will start the retrofit.
 - 3) The installer will verify the meter number with work order meter number.
 - 4) If the meter numbers do not match, then the installer will verify that the premise is correct.
 - 5) The installer will check the meter nameplate to ensure correct AMR module is used for the installation.
 - 6) Following the procedures outlined in the applicable Itron manual, the installer will:
 - Attach the existing index to AMR Module
 - Program the AMR Module to match meter characteristics and index reading
 - Spin test the AMR Module
 - Attach the AMR Module to the meter
 - Record the proper information (part of process)

- 7) The installer will seal the meter, as applicable.
 - 8) The installer will remove the old meter index cover and any debris ensuring the customer site is left as found.
- Field Deployment Quality Assurance Plan

Itron will implement a quality program consisting of the following:

- Field Validation between the NW Natural Customer Information System (CIS), the Meter (as entered by the installer), and the Meter Module -- Key data elements that will be validated are: meter drive rate, meter read using high / low checks, number of dials, pressure comp value, and meter number.
- Data Exceptions -- Work Order System. Exceptions will be flagged when the meter data does not match what is in the CIS. In most cases, these exceptions will generate a quality audit field work order for follow-up and resolution.
- Data Exceptions – CIS. Data will be validated and exceptions identified when the data is passed back to the CIS. Any exceptions will be sent back to Itron for follow-up and resolution.
- Field Quality Audits
 - Itron will inspect 100% of all work orders completed by new hires for a period of 10 working days from the date the installer begins field work (training period). All errors will be reviewed with the installer and appropriate follow-up training will be provided.
 - After the training period, 5% random sample of each installer's work orders will be audited on a monthly basis. Monthly reports will be generated and reviewed with NW Natural.
 - If, after the training period, an installer's installation errors are found to be in excess of 1%, the installer shall be removed from the field and retrained. All work performed by that installer during the 2 days prior to the installer being removed from the field shall be audited. If the audit results for those 2 days show an installation error of 2% or greater, all work done by the installer will be audited.
 - Retrained installers returning to the field shall have 100% of their work audited for 10 consecutive working days. Any error in the 10 days period will result in the installer being permanently removed from the field.
- Route/System Acceptance – Route acceptance will be performed as each route is completed and prior to turning a route over to AMR. System

acceptance will be performed at the end of the project prior to closing the project.

- On-Going System Maintenance – NW Natural and Itron will review field investigations caused by unread Meter Modules and potential reading issues after a route is accepted and moved into the operations and maintenance phase.

- Customer Service

Itron will address all customer inquiries pertaining to work performed by Itron daily, as they are received. Itron will document each inquiry and deliver a report to NW Natural weekly.

NW Natural will provide support to Itron regarding any customer issues where Itron is unable to reach an agreement with the customer or where Itron denies a claim and the customer does not accept the denial.

- Exception Process

Some common billing exceptions that are typically encountered during an AMR implementation are list below. These exceptions are usually a very small percentage (typically less than 1 %) of the overall population.

- Meter Reading High-Low Failure: The Found Meter Reading (and Likely Programmed Reading) data received from the field falls outside the acceptable reference limits established by NW Natural. Typical actions are to investigate the number of months the premise has been estimated, past usage, etc. Additional investigation may require onsite analysis. In all cases except when an index change may have been performed, the reading can be audited at the customer's premise. In those cases where a reading was incorrectly generated, the AMR module will require reprogramming. If the Found Meter Reading is verified to be less than the last billed reading, a cancel and rebill may be required.
- Meter Number Mismatch: Identifies that the meter number sent from the NW Natural's CIS did not match with the meter number the installer identified in the field.
- Dial Mismatch: Number of dials found in the field does not equal NW Natural CIS data. Situation may require reprogramming of the ERT unit.
- Drive Rate Mismatch: Meter drive rate found in the field does not equal NW Natural CIS (or Meter History System) data. Situation may require reprogramming of the ERT Unit.

- Pressure Compensated Index (if used) Mismatch: Pressure compensated index found in the field does not match NW Natural CIS (or Meter History System). Situation may require reprogramming of the ERT Unit.
 - Return to Utility (RTU): Identifies a work order that was not successfully installed with an AMR device. Situation could be a meter access issue, infrastructure issue, etc., as agreed to between Itron and NW Natural. Itron collects installer comments identifying the situation requiring an RTU. Situation requires the NW Natural to install the AMR device.
 - Field Originated Order: Identifies an order completed in the field where NW Natural has not sent a request for Itron to complete the work. The installer collects Found Meter Number, Meter Reading, and manual interpretation of service address. Situation requires NW Natural investigation.
 - Found Complete Job: Found Complete jobs result when an installer is dispatched to install an ERT at a particular meter, but finds an ERT already installed. The installer collects all standard installation information and verifies that the found ERT is responding and is programmed correctly. The job may result in reprogramming or replacing the ERT. Typically, these orders are sent to a report for investigation.
 - AMR Module Inventory and Status Check: The AMR module shipment file supplied by Itron will be used to populate an AMR module inventory database and installation orders may be used to update the status of individual AMR modules. Installed AMR modules can be checked against this inventory to verify that the AMR module is in NW Natural's inventory and that the AMR module is not shown as in stock and not already associated to a meter. AMR module inventory information may also be used for determining AMR module usage and stock levels by AMR module model.
- **Route Saturation**

The intent is to complete installations at 100% of work orders. A 99.5% work order completion goal within the first 60 calendar days a route is active will be established. This goal is set with consideration that some accounts may prove to be un-installable due to access or customer issues. NW Natural and Itron will jointly resolve un-installable accounts.
 - **Route Acceptance**
 1. **Meter Access Commitments:** Itron will notify the NW Natural Project Manager that meter access requirement for a given route has been met.

Work orders that do not result in a Meter Module installation will be reviewed.

2. Download File: NW Natural will produce a test route with all the appropriate AMR indicators set.
 3. Route Processing: NW Natural will process this route in its meter reading system and perform an AMR test read within 10 business days of route completion.
 4. Analyze Acceptance Test Data: Results will be analyzed against initial installation data and NW Natural will generate an exception's report listing Itron installed Mobile AMR accounts not read in the route. NW Natural will identify non-incrementing and failed high/low accounts. This report will be sent to Itron for field investigations after the AMR test read.
 5. Field Investigations: Itron will investigate missed, non-incrementing, and failed high/low accounts as defined in #4 above and will resolve as necessary within 5 business days of receiving notification.
 6. Review of Field Investigations: If mobile reading issues arise, Itron and NW Natural will review field investigation findings to determine the cause. Findings will be used to improve acceptance process and ensure future field investigations are appropriate.
 7. Acceptance: Route acceptance will occur if 99.5% of the accounts with meters that have an Itron installed Meter Module per the Meter Access Program and the Route Saturation Goals are read with the AMR collection device and show usage if applicable.
 8. Routing: Accepted routes will be converted to mobile routes. Changes to billing cycles will occur as the mobile routes are optimized.
- System Acceptance

System Acceptance will occur after the following deliverables have been met:

- Route acceptance forms delivered and signed off for all routes. Itron and NW Natural Project Managers will sign this acceptance form.
- Project Inventory reconciled and uninstalled product returned.
- All claims/complaints resolved.
- QA documentation completed and delivered.
- Field investigations completed and deficiencies corrected.
- All open project-related issues of a high or medium level as designated by NW Natural are resolved.
- Mobile Collector administrator and operator training completed.



- P+4 administrator and operator training completed.
- Endpoint-Link operator training completed.
- NW Natural facilities vacated and inspected.
- Meter Module maintenance and investigation training (meter shop procedures and field maintenance procedures) completed.
- Automated Meter Reading system maintenance training completed.
- NW Natural ID badges, keys, or any NW Natural logo or name items returned to NW Natural.

Communication Plan

- See attached Communication Plan.

Rates and Regulatory Affairs
Facsimile: 503.721.2532



April 24, 2006

VIA ELECTRONIC MAIL

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

Attn: Vikie Bailey-Goggins

Re: Request for Exclusion from the B1 Service Quality Measure for
Billing Accuracy for Automated Meter Reading (AMR) 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 Automated Meter Reading (AMR) project, as provided in Section VII(C) of the B1 SQM approved by the Commission in Docket UM 1218, OPUC Order No. 05-1055.

Specifically, the Company hereby requests that any billing errors that may arise as a direct result of the AMR 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 the duration of the AMR project period, plus sixty (60) days (June 2006 through June 2007).

A comprehensive Implementation Plan, which includes among other things, a detailed description of the AMR installation plan, quality assurance plan, and communication plan is enclosed in support of this request.

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 Implementation Plan or the AMR project in general.

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

Kelley Miller
Staff Assistant
Rates & Regulatory Affairs
220 NW Second Avenue
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Telecopier: (503) 721-2532
Telephone: (503) 226-4211, ext. 3589
E-mail: kelley.miller@nwnatural.com

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

Sincerely,

Onita R. King, Manager
Tariffs & Regulatory Compliance

enclosures

cc: Grant Yoshihara
Susan Dodge
Chuck Muehleck
Randy Trautman
Kay Steele

OPUC Staff:
Judy Johnson
Bonnie Tatom
Deborah Garcia