

PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: April 18, 2017

REGULAR \_\_\_\_\_ CONSENT X EFFECTIVE DATE May 1, 2017

DATE: March 30, 2017

TO: Public Utility Commission

FROM: Scott Shearer *SDS*

THROUGH: *J* Jason Eisdorfer, *MA* Marc Hellman, and *RS-G PB* Phil Boyle

SUBJECT: CASCADE NATURAL GAS: (Docket No. ADV 535/Advice No. O17-03-01)  
Housekeeping changes regarding curtailments and entitlements.

**STAFF RECOMMENDATION:**

Staff recommends that the filed tariff be allowed to go into effect as stated.

**DISCUSSION:**

Issue

The purpose of this filing is to make housekeeping changes. Cascade Natural Gas (CNG) filed a new tariff book, Tariff P.U.C. Or. No. 10, in its 2016 general rate case that was docketed as UG-305. The new Tariff was approved per Order No. 16-477 and became effective March 1, 2017. After CNG's initial filing in UG-305, they completed a more comprehensive review of both its Oregon and Washington tariff language and determined additional changes were necessary. This review was partly instigated by the cold weather experienced in December 2016, which resulted in a higher than normal heating load demand and system constraints that prompted CNG to call a curtailment event. After the curtailment event, CNG revisited its tariff language, and determined it would be useful to simplify and clarify the language associated with curtailments and entitlements.

Applicable Law

General rulemaking authority for the Commission is provided in ORS 756.060, under which the Commission may adopt reasonable rules and regulations relative to all statutes administered by the Commission. Under the current administrative rules, the

Commission authorizes energy and large telecommunications utilities to disconnect service in several instances, which are listed in OAR 860-021-0305.

### Analysis

In reviewing the proposed changes to the tariff language, Staff noted there were no provisions to notify customers of a pending disconnection for non-compliance of the tariff requirements, for schedules 163-General Distribution System Interruptible Transportation Service and 170-Interruptible Service. While the current administrative rules do not consider disconnection requirements for special contracts such as those listed in the proposed tariff, Staff is concerned that customers will not have adequate notice of a pending disconnection, thus having the opportunity to remedy the situation causing the proposed disconnection.

Staff consulted with CNG about the disconnection notification language in the tariff and contract/service agreement. CNG agreed to revise the terms of the contract/service agreement to include language that service may be disconnected for non-compliance with a curtailment order and that CNG will attempt to make contact with the customer before completing a disconnection. On March 29, 2017, CNG filed the Supplement to Cascade Housekeeping Filing (resubmission of exhibit b), which included the updated language on page 2 of the contract/service agreement in the section entitled "Disconnection for Non Compliance to Curtailment Order".

### Conclusion

To protect customers from unnecessary disconnection, Staff approves of the revised CNG contract/service agreement language that includes the terms for non-compliance of a curtailment order and attempted contact of the customer before disconnection. As the information is included in the specific contract, Staff does not see the need to include it in the tariff language.

### **PROPOSED COMMISSION MOTION:**

Allow Advice No. O17-03-01, with the revised contract/service agreement language, to go into effect for service rendered on and after May 1, 2017.