PUBLIC UTILITY COMMISSION OF OREGON INTEROFFICE CORRESPONDENCE

DATE: December 13, 2023

TO: Caroline Moore

FROM: Madison Bolton

SUBJECT: Northwest Natural Gas Company: 2024 Tariff has been updated. Northwest

Natural's Compliance filing at Advice No. 23-27 for Interest Accrued on

Customer Deposits and Late Payment Charge.

On November 29, 2023, Northwest Natural ("NW Natural" or "Company") proposed revisions to the following tariff sheet, P.U.C. OR. No. 25.

Oregon PUC Sheet No. Canceling Oregon PUC Sheet No.

8th Revision Sheet No. C-1 7th Revision Sheet No. C-1

Rebecca Trujillo, Regulatory Consultant at NW Natural requests to replace Oregon PUC Tariff No. 25, the 7th Revision Tariff Sheet C-1 with the 8th Revision Tariff Sheet C-1.

In compliance with Commission Order No. 23-438 in Docket No. UM 779, Public Utility Commission of Oregon Determination of Late-Payment Rate and Interest Accrued on Customer Deposits, NW Natural has made the tariff changes to reflect the late payment rate of 2.3 percent which utilities are allowed to collect on late payments.

The annual interest rate for customer deposits is addressed in the Company's Oregon PUC Tariff No. 25, General Rules and Regulations, Sheet RR-6, Rule 6, Deposits and other Security: General. The relevant section states:

"The Company may require a deposit or other security from a Customer or Applicant...Deposits will accrue interest at a rate prescribed by order of the Commission.

The language in NW Natural's Rule 6 is such that it references the Commission's authority in establishing the interest rate for customer deposits and obliges the Company to the most current rate without a direct reference to a specific order.

ADV 1576 December 13, 2023 Page 2

Staff's review included verifying the following requirements for compliance with Commission Order No. 23-438:

- The late payment fee of 2.3% of unpaid balance, effective for service on and after January 1, 2024.
- The interest rate of 5.5% on customer deposits held during January 1 through December 31, 2024.
- Attachments: NW Natural's Tariff Sheets for Late Payment charge and interest rate.

Staff verified NW Natural's Advice No. 23-27 and found that the new rates have been properly applied and the Company is in full compliance with the Commission order. Staff recommends an acknowledgement letter be sent.

Cc: Mark Brown

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Eighth Revision of Sheet C-1 Cancels Seventh Revision of Sheet C-1

SCHEDULE C **MISCELLANEOUS CHARGES AND CREDITS**

APPLICABLE:

To all Customers served by the Company under the Tariff of which this Schedule is a part.

To describe and summarize the charges and credits that may apply to Customers in addition to the rates established in the Rate Schedule or Service Agreement under which Customer receives service. See the DESCRIPTION OF CHARGES provision of this Schedule for specific terms and

SUMMARY OF CHARGES and CREDITS:

Late Payment Charge	2.3% of unpaid balance per payment period, but no less than \$3.00		(I)
Charge for Payment Not Honored (per incident)		\$ 15.00	
Service Reconnection Charges Scheduled 8:00 a.m. – 5:00 p.m. MonFri. (except Ho Scheduled after 5:00 p.m., MonFri. Same Day after 5:00 p.m. Mon-Fri, or on Saturday or	, ,	\$ 30.00 \$ 80.00 \$100.00	
Service Reconnection Charges – Curtailment Order			
8:00 a.m 5:00 p.m. MonFri. (except Holidays) After 5:00 p.m. MonFri. and on weekends or Holidays		\$ 150.00 \$ 600.00	
Inaccessible Meter Charge – Installation of Shut-off Valve		\$ 250.00	
Field Visit Charge		\$ 20.00	
Meter Interference	Actual costs of damages, additional or unusual costs related to the meter interfe of unbilled gas determined applicable Service Reconn	s or services directly erence, plus the amount I to have been lost, plus	
Unauthorized Use – failure to comply with Curtailment Order		\$ 10.00 per therm	
CSR Assisted Automated Payment Charge		\$ 2.50 per check	
Summary Billing Charge One-time time set up fee, per account Per account billed per month		\$ 5.00 \$ 1.00	

(continue to Sheet C-1.1)

Issued November 29, 2023 NWN OPUC Advice No. 23-27 Effective with service on and after January 1, 2024

NORTHWEST NATURAL GAS COMPANY

Received Filing Center OCT 26 2022

P.U.C. Or. 25

Second Revision of Sheet RR-6 Cancels First Revision of Sheet RR-6

GENERAL RULES AND REGULATIONS

(continued)

Rule 6. Deposits and other Security: General.

The Company may require a deposit or other security from a Customer or known Applicant for reasons set forth in Rule 2 and for other reasons as set forth in this Rule 6, Rule 6A, Rule 6B, or Rule 6C. A low-income Residential Customer, as defined in OAR 860-021-0180, will not be charged a deposit. The requirements for a Residential Customer or known Applicant are set forth in Rule 6A. The requirements for a Non-Residential Customer or Applicant are set forth in Rule 6B and Rule 6C. For builders, contractors, property developers, and property managers, when a deposit or other security is required the provisions applicable to Non-Residential service shall apply.

Where a deposit or deposit installment amount is billed and due and payable along with a Customer's bill for regular monthly gas usage, the amount paid by Customer shall first be applied toward payment of the amount due for the deposit, as set forth in **Rule 7**.

(D)

(C)

(N)

(N)

(C)

In the event a Customer pays a deposit or additional deposit amount, with a check or draft for payment that is returned or not honored by the respective financial institution, the Company may disconnect service for nonpayment of the deposit as set forth in **Rule 11**.

In the event a Customer concurrently terminates service at a current address and applies for service at a new address within the Company's service area, any deposit held by the Company for service at the current service address, plus accrued interest, will be applied to the new service address. Nothing precludes the Company from requiring an additional deposit under the terms set forth in **Rule 6A**, **Rule 6B**, or **Rule 6C**. If such Customer notified the Company of the change of address subsequent to the issuance of the closing bill for service at the terminated service address, then the Customer may be required to pay a new deposit as required by these rules.

Deposits will accrue interest at a rate prescribed by order of the Commission. Interest shall be computed from the date the deposit is paid (if paid in installments, from the date of the first payment) to the date of refund or application of the entire deposit amount to the Customer's account, or if applicable, to the end of any one Year period. Interest will be prorated on deposits held by the Company for less than a full Year.

The Company will review default deposit amounts with any change in billing rates. The default deposit amounts may be revised if a change in customer rates results in an increase or decrease of \$10.00 or more to the average Residential Customer's monthly bill, or \$25.00 or more to the average Schedule 3 small Commercial Customer's monthly bill.

(continue to Sheet RR-6.1)

Issued October 26, 2022 NWN OPUC Advice No. 22-18 Effective with service on and after November 1, 2022