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March 21, 2012

NWN Advice No. OPUC 11-19  
Second Errata Filing

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
550 Capitol Street, NE, Suite 215  
Post Office Box 2148  
Salem, Oregon 97308-2148

Attention: Filing Center

Re: **UG 221 – SECOND ERRATA FILING**  
Errata to Exhibit NWN/900 and Exhibit NWN/902 Williams

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or “Company”), files herewith its Errata to Mr. Dave William’s Testimony and Exhibit, Exhibit NWN/900 and Exhibit NWN/902 Williams/1.

This Errata filing replaces data obtained from a 2010 DataSource survey with updated data. The Company’s use of the 2010 DataSource survey information contained in the above-referenced exhibits is governed by the Company’s membership agreement with Edison Electric Institute (EEI), who originates the DataSource survey. The Company recently became aware that providing the 2010 DataSource information in the exhibit was inconsistent with the membership agreement. The Company has since contacted the respective utilities named in this Exhibit and was able to obtain updated information from each utility, together with their permission to use such information in the context of the Company’s general rate filing in this proceeding.

Please call me if you have questions.

Sincerely,

NW NATURAL

/s/ Onita King

Onita R. King  
Tariffs and Regulatory Compliance

enclosures

CLEAN VERSION

1 **Q. Is the current process working?**

2 A. The current process works well from the Company's perspective as it provides an  
3 effective and efficient way to manage field service work. The flexibility of the process  
4 has also helped the Company to keep field resource staffing levels fairly low. There are  
5 many factors that affect staffing levels, but on a system basis and at today's field  
6 resource staffing level and customer counts, the Company currently serves 6,681  
7 customers per service technician. A comparison of customers per service technician for  
8 other Northwest utilities is provided at *NWN/902, Williams/1*.

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14 **Q. If the process is working for the Company, why is the Company proposing to**  
15 **change it?**

16 A. We know from customer surveys that, for many of our customers, our current process  
17 does not meet *their* needs. We receive regular feedback from these customers that they  
18 are busy and in many cases are forced to take entire days off from work in order to  
19 obtain needed service. Or, to avoid losing wages or creating problems at work by  
20 requesting time off, they may agree to leave a key under the doormat, which causes  
21 concerns about security. In essence, while the current system may work well for the  
22 Company, it can be inconvenient for many of our customers. These customers expect,  
23 and we believe deserve, to have the option of scheduling a service appointment window.

## 5 – DIRECT TESTIMONY OF DAVID WILLIAMS

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1 A. As stated earlier in my testimony, at the current FTE level, the Company is at 6,681  
2 customers per service technician, which is in the mid-range of our peer utilities in the  
3 region. The ratio of customers per service technician would change to 5,642 at an FTE  
4 count of 122. At that level, the Company's customers per service technician would  
5 remain in the mid-range of our peers, who already offer some form of service  
6 appointment window to their customers. See *NWN/902, Williams/1*.

7 **Q. What additional changes would the Company need to make in order to implement**  
8 **its service window proposal?**

9 A. NW Natural will need to make some technology enhancements to existing systems to  
10 assist with scheduling of service appointments. This will assist in providing appointment  
11 availability information to the CCC representatives while talking with the customer.  
12 Additionally, the Company wants to make the offering of service appointments through  
13 all customer service products including over the telephone and web over time.

14 **Q. How long would it take NW Natural to implement service appointment windows?**

15 A. It takes a minimum of ten months to train a new service technician, so ten months  
16 represents the minimum amount of time it would take to fully implement our proposal.  
17 Assuming that the Company receives approval from the Commission to implement  
18 service appointments in November of 2012, the Company could expect to have a fully  
19 integrated service appointment window structure in place about mid-year 2013.  
20 However, upon approval of the Company's proposal, efforts will begin immediately to  
21 complete the systems programming to support the appointment window structure which  
22 would allow for a phase in of the number of available service appointment windows until  
23 we are able to meet the targeted average of 200 appointment windows per day.

## 9 – DIRECT TESTIMONY OF DAVID WILLIAMS

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**CURRENT TECHNICIAN TO CUSTOMER RATIO [1]**  
(SYSTEM WIDE)

COMPANY	SERVICE TECHNICIANS	NG CUSTOMER COUNTS	CUST PER TECH	OFFERS AM/PM APPOINTMENTS
NW Natural	102	681,460	6,681	No (Operate under an 8am-12am service time frame)
Avista	45	320,788	7,129	Yes (8am-12pm & 1pm-5pm)
Intermountain Gas	60	315,000	5,250	Yes (8am-5pm)
Puget Sound	104	763,365	7,340	Yes (8am-1pm & 1pm-12am)
Cascade NG	66	263,000	3,985	Offers 8am-5pm, and periodically an am/pm 4 hour window for orders such as PCC's

2013 NW NATURAL TECHNICIAN TO CUSTOMER RATIO			
PRE VS. POST	SERVICE TECHNICIANS	NG CUSTOMER COUNTS *	CUST PER TECH
Pre-Service Window Appts.	109	688,275	6,314
Post-Service Window Appts.	122	688,275	5,642

\*Based on forecasted customer growth ( 1% for 2013)

[1] Data based on a March 2012 informal survey of each utility and updated data for NW Natural as of March 1,

NWN/902  
Williams/1

REDLINE VERSION

1 **Q. Is the current process working?**

2 A. The current process works well from the Company's perspective as it provides an  
3 effective and efficient way to manage field service work. The flexibility of the process  
4 has also helped the Company to keep field resource staffing levels fairly low ~~when~~  
5 ~~compared to our utility peers in this region.~~ There are many factors that affect staffing  
6 levels, but on a system basis and at today's field resource staffing level and customer  
7 counts, the Company currently serves ~~7,170~~ 6,681 customers per service technician. A  
8 comparison of customers per service technician for other Northwest utilities is provided  
9 at, as compared to Avista Corporation ("Avista") at 6,673 customers per service  
10 technician and Cascade Natural Gas Corporation ("Cascade") at 3,950 customers per  
11 service technician. Intermountain Gas Company and Puget Sound Energy, Inc. are in  
12 between Avista and Cascade at 5,237 and 5,691 customers per service technician,  
13 respectively. See NWN/902, Williams/1.

14 **Q. If the process is working for the Company, why is the Company proposing to**  
15 **change it?**

16 A. We know from customer surveys that, for many of our customers, our current process  
17 does not meet *their* needs. We receive regular feedback from these customers that they  
18 are busy and in many cases are forced to take entire days off from work in order to  
19 obtain needed service. Or, to avoid losing wages or creating problems at work by  
20 requesting time off, they may agree to leave a key under the doormat, which causes  
21 concerns about security. In essence, while the current system may work well for the  
22 Company, it can be inconvenient for many of our customers. These customers expect,  
23 and we believe deserve, to have the option of scheduling a service appointment window.

## 5 – DIRECT TESTIMONY OF DAVID WILLIAMS

1 A. As stated earlier in my testimony, at the current FTE level, the Company is at ~~7,170~~  
2 6,681 customers per service technician, which is in the mid-range of ~~materially higher~~  
3 ~~than~~ our peer utilities in the region. The ratio of customers per service technician would  
4 change to ~~5,571~~ 5,642 at an FTE count of 122. At that level, the Company's customers  
5 per service technician ~~which~~ would remain in the mid-range of ~~bring the ratio in line with~~  
6 our peers, who already offer some form of service appointment window to their  
7 customers. See *NWN/902, Williams/1*.

8 **Q. What additional changes would the Company need to make in order to implement**  
9 **its service window proposal?**

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19 service appointments in November of 2012, the Company could expect to have a fully  
20 integrated service appointment window structure in place about mid-year 2013.  
21 However, upon approval of the Company's proposal, efforts will begin immediately to  
22 complete the systems programming to support the appointment window structure which

## 9 – DIRECT TESTIMONY OF DAVID WILLIAMS



- 1 would allow for a phase in of the number of available service appointment windows until
- 2 we are able to meet the targeted average of 200 appointment windows per day.

## 9 – DIRECT TESTIMONY OF DAVID WILLIAMS

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## CERTIFICATE OF SERVICE

I hereby certify that I served NW NATURAL'S SECOND ERRATA FILING - NWN ADVICE No. OPUC 11-19 in docket UG 221, upon the following parties by electronic mail.

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DATED at Portland, Oregon, this 21st day of March 2012

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