



# Oregon

Kate Brown, Governor

## Public Utility Commission

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February 13, 2020



BY EMAIL

Northwest Natural Gas Company, dba NW Natural

Attn: Natasha Siores

natasha.siores@nwnatural.com

RE: Advice No. 20-1

At the public meeting on February 13, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1079. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: February 13, 2020**

**REGULAR**  **CONSENT**  **EFFECTIVE DATE** March 1, 2020

**DATE:** February 3, 2020

**TO:** Public Utility Commission

**FROM:** Mitchell Moore

**THROUGH:** Michael Dougherty, John Crider, and Matt Muldoon **SIGNED**

**SUBJECT:** NORTHWEST NATURAL:  
(Docket No. ADV 1079/Advice No. 20-1)  
Revises Schedule B – Bills and Bill Payment Options

**STAFF RECOMMENDATION:**

Staff recommends that the Commission approve Northwest Natural’s (NW Natural or Company) filing that revises Schedule B – Bills and Bill Payment Options to accommodate new forms of payment, updates outdated language and revises information within the Auto Pay Plan Section, with an effective date of March 1, 2020.

**ISSUE:**

Whether the Commission should approve NWN’s proposed updates to its Schedule B Bills and Bill Payments Options, with an effective date of March 1, 2020.

**DISCUSSION:**

Applicable Law

The Commission may approve tariff changes if they are deemed to be fair, just and reasonable. ORS 757.210. Tariff revisions may be made by filing revised sheets with the information required under the Commission’s administrative rules, including OAR 860-022-0025. Filings that propose any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the change. See ORS 757.220; OAR 860-022-0020.

## Overview

On January 8, 2020, NWN filed Advice No. 20-1, requesting an update to Schedule B – Bills and Bill Payments Options tariff. The purpose of the filing is to: 1) accommodate new forms of payment; 2) update outdated language related to bankcard payments, paper forms and letters; and 3) streamline the flow of information within the Auto Pay Plan section.

## Analysis

Schedule B provides a general description of the various billing and bill payment options available to NW Natural's customers. In 2020, NW Natural will be working with a new payment processor for transacting payments online. As a result, the Company's customers will be able to make electronic payments using a variety of methods that are not currently listed in Schedule B. This filing revises Schedule B to accommodate these new payment forms.

Additionally, the filing revises other language in the tariff to better reflect the current bill and bill payment options available to its customers.

Among the changes proposed by NW Natural are:

- Removes language delineating specific electronic payment methods, which ensures that future new electronic payment methods that become available are not excluded.
- Revises the reference to e-mail with regard to the monthly bill notification, to indicate that notification may be provided via e-mail or a text or other electronic means.
- Removes the restriction for Interruptible Service or Transportation Service schedule customers from using Paperless Billing, to reflect NW Natural's updated billing system capability to provide the service to these customers.
- Restricts third-party commercial payers and payment aggregators from using non-ACH payments so that these entities do not benefit from the Company's fee-free non-ACH payment service.
- Removes language allowing NW Customers to enroll in auto-payment ACH billing process through submitting a written form, and requiring customers to sign up for this process through the Company's website. This reduces Company and

customer risk in receiving and storing customers' personally identifiable information. Customer's that need assistance in signing up for auto-pay billing will be accommodated by contacting customer support by phone.

### Conclusion

Staff and the Commission's Consumer Services division reviewed the Company's filing and redline changes to the Company's Schedule B – Bill and Bill Payment Options. Staff is satisfied that the changes are appropriate and reasonable, and will better reflect the bill and bill payment options available to its customers. Staff recommends the update to Schedule B be approved.

The tariff changes proposed in this filing will have no impact on customer rates.

### **PROPOSED COMMISSION MOTION:**

Approve NW Natural's filing that revises Schedule B – Bills and Bill Payment Options to accommodate new forms of payment, updates outdated language and revises information within the Auto Pay Plan Section, with an effective date of March 1, 2020.

# NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Third Revision of Sheet B-1  
Cancels Second Revision of Sheet B-1

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## SCHEDULE B BILLS AND BILL PAYMENT OPTIONS

### AVAILABLE:

In all territory served by the Company under the Tariff of which this Schedule is a part.

### DESCRIPTION:

This Schedule describes the various bill and bill payment options available to the Company's Customers. Once elected, the bill and payment option(s) will remain in effect until terminated by Customer, or until terminated by the Company should Customer fail to comply with its terms. (T)  
(C)(D)

### STANDARD BILLING AND BILL PAYMENT:

Unless a paperless billing option is elected, Customers will receive a printed bill via U.S. Mail. Bills may be paid by check, money order or in cash, or electronically by bank-to-bank payments made through the Automated Clearing House network (ACH Payments) or by other electronic (non-ACH) payments. (C)(D)  
Payments made by means other than cash shall be considered valid only when honored by the Customer's financial institution. (C)  
(T)

### PAPERLESS BILLING:

Paperless billing is an online bill presentment option available to most Customers directly through NW Natural. Under this bill option, a monthly electronic bill notification is sent to the Customer fifteen (15) days prior to the stated due date. The bill notification includes at least the amount due, the due date, and a link back to a secure area in the Company's website where, upon valid sign-in, the Customer can view their bill statement. No paper bill will be issued. Customers can enroll in this bill presentment option via the Company's website. To enroll, Customers must register at the Company's website using a valid gas account number, and e-mail address. Customers using the Company's Summary Bill services are not eligible for paperless billing. (T)  
(T)(D)  
(C)  
(C)  
(C)

### ACH PAYMENTS

Customers can make secure online checking or savings account payments at the Company's website or through the company's Interactive Voice Recognition (IVR) system. To use this payment option, Customers must provide valid checking or savings account information for the account from which payments are to be deducted. When making an ACH payment, payments will be automatically deducted from Customer's bank account and credited to Customer's gas service account on the date specified by the Customer, or the following business day if the date specified is a weekend or Holiday. (M)(C)  
(C)  
(C)  
(C)  
(M)

### OTHER ELECTRONIC (non-ACH) PAYMENTS

Residential Customers and Non-Residential Rate Schedule 3 Customers with annual usage of 25,000 therms or less can make bill payments with a non-ACH payment method (such as a credit card or debit card) at any time. A non-ACH payment can be made online on the Company's website or through the Company's Interactive Voice Recognition system. The Company may limit the number of transactions that can be made in any given time period. The Company reserves the right to deny a Customer the use of the non-ACH payment option when a bank card interchange network declines a Customer's transaction for reasons of fraud or other illegal use. The Company will not accept non-ACH payments from third-party commercial payers and/or payment aggregators. (M)(C)  
(C)  
(C)  
(D)  
(M)(N)  
(N)

### AUTO PAY PLAN:

The Auto Pay Plan is an electronic bill payment option available to Customers as described below. Auto Pay allows for automatic bill payments to be made to the Company directly from Customer's financial institution ("Bank Account"). To participate, Customers must provide valid account information to the Company or its authorized payment processor. Payments will be automatically deducted from Customer's Bank Account and credited to Customer's gas service account on the payment due date stated on Customer's bill (C)  
(C)

(continue to Sheet B-2)

Issued January 8, 2020  
NWN OPUC Advice No. 20-1

Effective with service on  
and after March 1, 2020

Received by OPUC  
Filing Center  
01/08/2020

# NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Third Revision of Sheet B-2  
Cancels Second Revision of Sheet B-2

## SCHEDULE B BILLS AND BILL PAYMENT OPTIONS (continued)

### AUTO PAY PLAN (continued):

#### Checking or Savings Account (ACH) Eligibility.

All Customers are eligible for the Auto Pay Plan using the checking or savings account payment option, except that Customers using the Company's Summary Bill services are not eligible.

Customers may sign up through the Company's website.

(T)

(C)(D)

#### Other Electronic Payment Methods (non-ACH) Eligibility.

Residential and Non-Residential Rate Schedule 3 Customers with annual usage of 25,000 therms or less are eligible for the Auto Pay Plan using a bankcard (credit or debit card) or alternative electronic payment methods as may be offered by the Company, except that Customers using the Company's Summary Bill services are not eligible. Customers must sign up through the Company's website.

(T)

(N)

(N)

(C)

#### Auto Pay Payments Not Honored.

All Auto Pay payments that are not honored by the Customer's financial institution will be subject to the same Payments Not Honored rules for all payment methods in this Schedule B.

(C)

(C)(T)

(C)(T)

In the event that a payment failure occurs because the Bank Account is reported closed or a payment method has expired the Company will terminate the Customer's Auto Pay Plan.

(C)

(C)

Two (2) payment failures in a twelve-month period may be cause for the Company to automatically terminate Customer's Auto Pay Plan and the customer may be restricted from enrolling in the Auto Pay Plan for the next 12-month period.

The Company will notify the Customer advising them of any termination of the Auto Pay Plan due to payment(s) not honored.

(T)

(T)

Should the Company find that a Customer no longer qualifies for the non-ACH option, regardless of the account status, the Company will notify the Customer and the Customer will be removed from the Auto Pay Plan non-ACH option. The Customer may sign up for the Auto Pay Plan ACH option provided they meet the eligibility requirements described in this Schedule B.

(T)

(T)

(T)

### PAYMENTS NOT HONORED.

When any payment failure occurs, a Payment Not Honored charge as set forth in **Schedule C** will be assessed to Customer's account at that time, and the gas service account will be considered delinquent. Failure to pay such account will be cause for Disconnection of Service. Two (2) payment failures in a twelve-month period may be cause for the Company to restrict payment method options for the next 12-month period.

(C)

(C)

The Company will notify the Customer advising them of any payment failures due to a payment not honored.

(N)

(N)

(continue to Sheet B-3)

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# NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Second Revision of Sheet B-3  
Cancels First Revision of Sheet B-3

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## SCHEDULE B BILLS AND BILL PAYMENT OPTIONS (continued)

(M)

### **RESIDENTIAL EQUAL PAY PLAN:**

Residential Customers whose gas service accounts are current may sign up for the Equal Pay Plan at any time during the calendar year.

The Residential Equal Pay Plan is a bill payment option designed to levelize Customer's monthly payments for gas service over an eleven-month period. Levelized monthly payments are based on (a) the rates stated in Customer's respective Rate Schedule and (b) an estimate of Customer's projected annual usage requirements, determined from prior usage history at the service address, or from a calculated usage adjusted for Customer's current requirements.

(continue to Sheet B-4)

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