



Oregon

Kate Brown, Governor

Public Utility Commission

201 High St SE Suite 100

Salem, OR 97301-3398

Mailing Address: PO Box 1088

Salem, OR 97308-1088

503-373-7394

March 20, 2020



BY EMAIL

Cascade Natural Gas

Michael Parvinen

Michael.parvinen@cngc.com

RE: Advice No. O20-03-02

At the public meeting on March 20, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1103. The Staff Report, a receipted copy of the sheets in your advice filing, and the signed LSN are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

ITEM NO. RA3

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: March 20, 2020

REGULAR CONSENT EFFECTIVE DATE _____ Upon Commission Approval _____

DATE: March 19, 2020

TO: Public Utility Commission

FROM: John Crider

THROUGH: Bryan Conway

SUBJECT: CASCADE NATURAL GAS:
(Docket No. ADV 1103)
Request a change to Sheet No. 5.8 and Sheet No. 200.1 to allow a temporary suspension of the Late Payment Charge.

STAFF RECOMMENDATION:

Staff recommends that the Commission approve Cascade Natural Gas's (Company) request for a modification to tariff Sheets No. 5.8 and Sheet 200.1 to allow for temporary suspension of late charges for unpaid accounts with less than statutory notice.

DISCUSSION:

Issue

Whether the Commission should approve the Company's request to modify its tariff sheets in order to allow discretion for temporary suspension of late charges for unpaid accounts.

Applicable Rule or Law

ORS 757.205, OAR 860-022-0025, and OAR 860-022-0030 establish rules for tariff changes and updates to rates. ORS 757.220 provides for less than 30 days' notice for a tariff change with good cause.

Analysis

The language in Sheet 5.8 states in part: “A Late-Payment Charge as established in Schedule 200 *will* be applied to overdue account balances, both residential and nonresidential, at the time of preparing the subsequent month's bill.” There is similar language in Schedule 200 asserting a late payment “will” be applied to unpaid accounts. The Company requests a language change to both tariffs, changing the word “will” to “may”, in order to provide discretion in applying the charge. This flexibility will allow the Company to temporarily waive late charges for unpaid accounts during the declared COVID-19 emergency.

In its petition, the Company states that it wishes to be immediately responsive to the rapidly changing economic conditions facing customers in the wake of the spreading COVID-19 virus, and that this tariff change will help them meet that goal.

The Company filed the request to be approved with less than statutory notice as required by ORS 757.220. The Company claims “good cause” due to the request being in response to the declared COVID-19 emergency. Staff agrees with the Company’s rationale for good cause.

Conclusion

Staff concludes that the Company's tariff modification request is warranted, is in the best interest of customers, and should be granted with less than statutory notice.

PROPOSED COMMISSION MOTION:

Approve Cascade Natural Gas’s request for a modification to tariff Sheet No. 5.8 and Sheet No. 200.1 to allow for temporary suspension of late charges for unpaid accounts with less than statutory notice.

**SCHEDULE 200
VARIOUS MISCELLANEOUS CHARGES**

APPLICABILITY

This schedule sets forth the provisions for various charges throughout these rules and regulations. The name and amount of the charges are listed below. The rules or rate schedules to which each charge applies are in parenthesis.

- I. Customer Deposit Interest Rate (Rule 4) 1.5%

- II. Reconnection Charge (Rule 5)
 - a. Standard, 8 a.m. and 5 p.m., Monday through Friday, excluding holidays \$32.00
 - b. After Hours between 5 p.m. and 9 p.m., Monday through Friday \$50.00
 - c. Same Business Day or on a Saturday, Sunday or holidays \$100.00

A reconnection charge will be required for reestablishment of service at the same address for the same person taking service, if service was disconnected at the customer's request or if it was disconnected involuntarily for reasons other than for Company initiated safety or maintenance.

- III. Deposit for Meter Test - (Rule 8) \$50.00

- IV. Field Visit Charge- (Rule 5) \$20.00
 A field visit charge may be assessed whenever Cascade visits a customer's address for the purpose of disconnecting service or reconnecting service and due to the customer's action is unable to complete the disconnection or reconnection.

- V. Late Payment Charge – (Rule 5) 2.1%
 A late payment charge at a rate determined by the Commission based upon a survey of prevailing market rates may be assessed to the customer's current bill when the customer has a prior balance owing of \$200 or more. (C)

- VI. Returned Payment Charge - (Rule 6) \$25.00
 A returned check fee of twenty-five dollars (\$25.00) may apply for any payment returned unpaid.

- VI. Modifying an Existing Service Line – (Rule 9)
 - a. Time of Construction Crew
 - An Individual Employee \$70.00 per hour
 - Construction Crew up to \$220.00 per hour
 - b. Cost of Materials required to open and close service connection trench, including asphalt replacement, if any.

Received by OPUC

**RULE 5
DISCONTINUATION OF SERVICE**

FIELD VISIT CHARGE

A Field Visit Charge as established in Schedule 200 may be charged whenever Cascade is required to visit a residential service address for the purpose of disconnecting or reconnecting service, but due to the customer's action, is unable to complete the reconnect or disconnect.

LATE PAYMENT CHARGE

A Late-Payment Charge as established in Schedule 200 may be assessed to overdue account balances, both residential and nonresidential, at the time of preparing the subsequent month's bill. The Late-Payment Charge may not be applied to time-payment or equal-payment accounts that are current, and will be applied only to accounts that have an overdue balance greater than \$200. The Commission will determine the Late-Payment Charge by surveying prevailing market rates for late-payment charges of commercial enterprises. The Commission will notify Cascade by November 15 of each year what rate may be used to determine late-payment charges on overdue customer accounts during the following calendar year. The current late-payment rate and the conditions for its application to customer accounts shall be specified on the gas bill.

(C)

Received by OPUC

LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at puc.filingcenter@state.or.us.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF)	UTILITY L.S.N. APPLICATION
Cascade Natural Gas Corporation)	NO. <u>2257</u>
(UTILITY COMPANY))	(LEAVE BLANK)
TO WAIVE STATUTORY NOTICE.)	

NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.


1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)
The purpose of this filing is to modify the language in Rule 5, Discontinuation of Service, Late Payment Charge, to allow Cascade to suspend billing of the Late Payment Charge during certain events.

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)
Original Sheet No. 5.8
Fourth Revision of Sheet No. 200.1

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)
First Revision of Sheet No. 5.8
Sixth Revision of Sheet No. 200.1

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:
Cascade requests a waiver to allow the changes to become effective on March 21, 2020 to suspend billing of the late payments.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): March 21, 2020

. AUTHORIZED SIGNATURE <i>/s/ Michael Parvinen</i>		TITLE Director, Regulatory Affairs	DATE 03/18/2020
PUC USE ONLY			
<input checked="" type="checkbox"/> APPROVED	<input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE 03/21/2020	
AUTHORIZED SIGNATURE 			DATE 03/20/2020