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September 7, 2018

VIA ELECTRONIC FILING

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09/07/18 08:52
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UTIL. AND TRANSP.
COMMISSION

RE: Docket U-180525
Rulemaking to modify existing consumer protection and meter rules to include
Advanced Metering Infrastructure

Northwest Natural Gas Company (“NW Natural” or the “Company”) submits its responses to the questions for consideration that were set forth in the notice issued July 10, 2018 in the above-referenced docket. NW Natural’s responses are identified in bold-italicized text.

QUESTIONS FOR CONSIDERATION

Data Privacy

1. What information pertaining to customers’ energy usage do companies currently collect, retain, or share with third parties?
 - a. What incremental or different information will companies collect or retain with the implementation of AMI?
 - b. Under what circumstances would sharing customer information be necessary for companies to provide utility service?
 - i. What specific information would it be necessary for companies to share to provide utility service?
 - ii. With whom or with what organizations would it be necessary for companies to share such information?
 - c. If not necessary for providing utility service, what information do companies anticipate sharing with third parties for the benefit of customers, and for what specific purpose should the utility share the information with third parties?

NW Natural collects and retains customer energy usage information as required by WAC 480-90-103(6) and (7) by customer account in its Customer Information System (CIS) on a current year plus 5-year basis.

NW Natural shares customer-specific energy usage information with the Energy Trust of Oregon. In addition, NW Natural may share, upon request, customer-specific energy usage information with agencies that deliver the Company's low-income energy assistance and low-income energy efficiency programs to qualifying low-income customers. The sharing of this information enables customers to participate in certain programs that complement or pertain to a customer's utility service.

NW Natural may share, upon request, aggregated usage information for a commercial building with a building owner and/or a state, city, or county jurisdiction.

NW Natural has no current plans to implement AMI.

2. With respect to the information provided in response to Question #1, please respond to the following:
 - a. What kind of historical data, and for what time period, should companies maintain information in order to comply with regulatory reporting needs (load studies, conservation and energy efficiency, reliability)?

NW Natural sees value in retaining historical usage data by rate schedule, by customer class for an indeterminate period of time. Customer-specific usage data has a much shorter useful life span and is typically retained on a current year plus 5-year basis, primarily to meet billing and payment obligations.

- i. How will companies dispose of customers' energy usage information collected from AMI when it is no longer needed or used?

NW Natural has not undertaken any evaluation of the retention or destruction of energy usage information in an AMI environment.

- b. What rights do or should customers have with respect to their energy use data (co-owners of the data, right to access, right to share with third-parties)?
 - i. What type of customer notice should be required regarding the collection, storage, use, and disclosure of customer data (within a company and with third-parties)?
 - ii. How should the companies be required to obtain customer authorization to share data?

Customers should, and do currently have the right to access their energy use data via on-line access to their account information. NW Natural's privacy policy protects customer-specific information from being shared with third parties that do not have rights to that information except through company-offered programs (for instance, the Energy Trust). Even in the case of the Energy Trust, customers currently have the right to refuse the sharing of their information, and are notified of this right through an annual

bill insert. Otherwise, NW Natural will not release information to any third party unless the customer has first consented to its release.

3. How will companies manage and protect customers' energy usage data generated by AMI technologies?
 - a. How should the rules differ for individual customer data and aggregated use data?
 - b. What data collected by AMI should be classified as personally identifiable customer information (PII)?
 - i. How should the rules differ for Anonymous Personal Usage Information (defined as data not explicitly classified as PII that may reveal details, patterns, or other insights into the personal lives, characteristics, or activities of individual customers)?
 - c. How have companies evaluated cyber security risks in the planning, design, or implementation of the AMI system?
 - i. Did your evaluation cause any changes to the plan or procurement of system components? How?
 - ii. If you are using a third-party vendor for any portion of the AMI network, have you evaluated your supply chain for the necessary data security protections? Are there contractual requirements?
 - iii. In the event of a cyber security incident that impacts AMI meters or back office systems, what is your plan to mitigate the rate impact to customers?
 1. Are you purchasing (or do you plan to purchase) cyber security insurance for this project? Does this protection extend to third-party vendors in the event the breach of customer data is beyond your firewall?
 - d. Should the companies be required to report any breach of customer data to the Commission? If not, what set of parameters or threshold is appropriate to require reporting of a breach?
 - i. What timeframe should the companies be required to report the breach to the Commission?
 - e. Should the National Institute of Standards and Technology (NIST) cyber security standards form a basis for keeping customer data secure? If not, why?

NW Natural has not undertaken any evaluation of how or whether changes in customer data protection or cyber security plans would be required in an AMI environment.

4. How will customers have access to their energy usage information collected in AMI?
 - a. What platform will you use for customer data access?
 - b. How will you educate customers on viewing and using the platform?
 - i. Will the usage provided to customers be at the same granularity as programmed into the customer's smart meter? What type of outage reporting will you provide?

- c. What time intervals will you use to send customers their energy usage data (near real-time, sub-hourly, daily)?

NW Natural has not undertaken any evaluation of how or whether the manner in which customers access their energy usage data would change in an AMI environment.

Prepaid Service and Customer Deposits

5. What kind of prepaid services will you implement for AMI customers?
 - a. Will companies keep separate accounting records for prepayment services associated with AMI?
 - b. Will the prepayments accrue interest?
 - c. How do companies anticipate changing deposit calculations based on information available from AMI technology?
 - d. How will you address the issue of customers receiving a double bill for the transition month, which will include both the closing bill for post-read billing and the first month of prepayment?

NW Natural has not undertaken any evaluation of how or whether prepaid services would be offered, or how or whether any changes to deposit calculations would be made in an AMI environment.

6. How will prepayment systems comply with notice requirements?

Not applicable to NW Natural.

7. How will you incorporate energy assistance into prepayment agreements?

Not applicable to NW Natural.

Remote Disconnection

8. What are the advantages and limitations of remote disconnection?

NW Natural has not undertaken any evaluation of any advantages or limitations of remote disconnection.

9. If the Commission allows remote disconnections for non-payment, in what circumstances would you remotely disconnect customers?

NW Natural has not undertaken any evaluation of remote disconnection.

10. What percentage of current disconnection visits result in the customer making a payment to stop the impending disconnection after the service technician makes contact, but before service is disconnected?

NW Natural looked at 2017 data. Approximately 24% of residential customers paid a service technician at the door to avoid a pending disconnection, and approximately 47% of commercial customers paid at the door to avoid a pending disconnection.

11. Is it necessary to modify current rules governing disconnection or customer notice rules to allow companies to remotely disconnect and reconnect customers?

Rule changes would likely be necessary to address the differences in customer notice and disconnect/reconnect processes in a remote disconnection/reconnection environment.

12. During what time of day should disconnection and reconnections occur (e.g., before noon, 24 hours a day, or during business hours only)?

- a. In the case of a customer disconnected for non-payment, how long will the company take to remotely reconnect service after payment has been received?
Meters

NW Natural has not undertaken any evaluation of remote disconnection.

13. What meters will the companies be installing in Washington State (brand, make, model)?

- a. What are the parameters for measuring and testing the accuracy of the meters?
- b. What accuracy range do manufacturer(s) guarantee for those meter sets?

Not applicable to NW Natural.

14. Are you aware of any health or safety concerns related to AMI?

- a. What research have you conducted concerning health or safety for the meter sets you will be purchasing?
- b. Please provide copies or electronic links to the research and any studies on which you have relied.

Not applicable to NW Natural.

15. Please explain your current tampering and theft detection process.

- a. How might AMI technology alter that process?

A copy of NW Natural's company policy is attached with this response. NW Natural has not undertaken any evaluation of how or whether its tampering and theft detection process might change in an AMI environment.

Billing Requirements

16. In what circumstances do you believe estimating a customer's bill will be required with AMI?

NW Natural has not undertaken any evaluation of bill estimating practices in an AMI environment.

17. Generally, what type of reporting will be available on customer bills as it relates to usage? More specifically:

- a. What mechanism in customers' bills will display customer-elected load curtailment and control?
- b. What type of reporting will you provide as it relates to tamper and theft detection?
- c. What type of reporting will you provide as it relates to voltage reduction?

Not applicable to NW Natural.

18. Will the AMI system give customers the ability to program budget billing and conservation goals?

Not applicable to NW Natural.

19. Explain the rate and bill flexibilities you will offer customers in conjunction with AMI deployment.

Not applicable to NW Natural.

Customer Education

20. Please identify the policies and education programs will you use to inform customers about the following:

- a. How to report suspected equipment malfunction.
- b. How to get help reading usage, voltage reduction reports, and outage reports.
- c. How to use the AMI technologies to curtail electricity use, and the potential to help control peak demand for all customer classes.

Not applicable to NW Natural.

NW Natural appreciates the opportunity to comment in this proceeding.

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Sincerely,

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