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November 25, 2019

NWN WUTC Advice No. 19-08

**VIA ELECTRONIC FILING**

Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

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State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**Re: Schedule M—Meter Testing Procedures**

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following revisions to its Tariff WN U-6, stated to become effective with service on and after **January 1, 2020**:

First Revision of Sheet M.1	Schedule M	Meter Testing Procedures
First Revision of Sheet M.2	Schedule M	Meter Testing Procedures

**Purpose**

The purpose of this filing is to correct a typographical error in Schedule M – Meter Testing Procedures (Schedule M) and make general housekeeping changes to Schedule M to update outdated language and provide useful clarification.

**Background**

Schedule M provides a general description of the Company’s meter testing processes and procedures and reflects the Company’s internal Engineering Procedure Z-1. It has come to the Company’s attention that the last paragraph of Sheet M.2 identifies the incorrect percentage of required meter change-outs above which the Company may extend the meter change-out schedule. The percentage identified at 5 (five) percent is incorrect and needs to be changed to 3 (three) percent to match the Company’s Engineering Procedure Z-1.

**Proposed Change**

NW Natural proposes to correct the tariff language described above to indicate 3 (three) percent, consistent with the Company’s Engineering Procedure Z-1 and the original intent of the Schedule M content. To the best of our knowledge, the 5 (five) percent currently identified in Schedule M is a typographical error that has been recently detected. The Company has historically balanced meter change-out workload and forecasting by following the 3 (three) percent threshold in Engineering Procedure Z-1.

Engineering Procedure Z-1 comports with American National Standards Institute (ANSI) standards, as described below.

Despite the difference between the tariff and the engineering procedure, the Company has remained compliant with both Schedule M and Engineering Procedure Z-1. The annual number of meters required for change-out has not approached either the 5 (five) percent or 3 (three) percent threshold, respectively. However, NW Natural anticipates exceeding 3 (three) percent in 2020 and in future years, at which point the Company may elect to use the four-year replacement program recommended by ANSI standard B109-1 Section 4.3.2.1 for Corrective Action. To remain compliant with Schedule M and to provide consistency between the tariff and Engineering Procedure Z-1, NW Natural requests this change.

NW Natural also proposes to delete the superfluous phrase otherwise necessitating that the Company receive Commission approval before extending the meter change-out schedule. The regulations for meter test procedures outlined in WAC 480-90-343 already require a gas utility to submit a revised tariff to the Commission whenever it changes any portion of its meter test procedure, including the corrective action and time period that will be implemented. NW Natural's Schedule M is in compliance with these regulations.

NW Natural also proposes minor housekeeping changes on Sheet M.1 to update the list of equipment for proving meters to reflect current operations. In addition, housekeeping edits on Sheet M.1 are made to clarify the applicable ANSI standards. Finally, minor edits on Sheet M.2 provide the reader with a better understanding of meter lot samples by changing the number formats from decimal form to percentages.

Confidential Attachment A is NW Natural's Engineering Procedure Z-1. NW Natural's Engineering Procedure Z-1 contains confidential and proprietary information describing the Company's testing guidelines for new and in-service meters used to statistically evaluate the performance of specified meter families. Accordingly, NW Natural considers the document to be confidential and hereby requests that it be accorded confidential treatment in accordance with RCW 80.04.095 and WAC 480-07-160. No portion of these materials may be copied, reproduced, or disclosed in any manner without the express permission of the Company.

The Company respectfully requests that the tariff sheets filed herein be approved effective with service on and after January 1, 2020.

As requested by WAC 480-80-103(4)(a), I certify that I have authority to issue tariff revisions on behalf of NW Natural.

Please address correspondence on this matter to me with copies to the following:

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Sincerely,

NW NATURAL

*/s/ Natasha Siores*

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Attachments:

NEW-NWN-WUTC-Advice-19-08-Trf-Sheet-M-1-11-25-2019  
NEW-NWN-WUTC-Advice-19-08-Trf-Sheet-M-2-11-25-2019  
NEW-NWN-WUTC-Advice-19-08-Attachment-A-11-25-2019(C)  
NEW-NWN-WUTC-Advice-19-08-Attachment-A-11-25-2019(R)