

September 30, 1999

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

Attention: Jim Russell and Graciela Etchart

Re: ***Docket No. UG-990294 Gas Companies Operations Rulemaking
Chapter 480-90 WAC – Comments on Staff's 2nd Draft Rules***

NW Natural (NWN) submits the following comments, edits, and proposed changes to Staff's Second Draft Rules distributed 9/14/99 for consideration in the above-referenced matter.

Please consider these comments and changes as preliminary and subject to change upon further, more comprehensive review. NW Natural's comments relate only to those rules that apply to natural gas utilities.

Our comments, in the order of the draft document, are as follows:

GENERAL RULES:

WAC 480-90-011 Application of rules.

No changes or comments.

WAC 480-90-xx1 Exemptions from rules.

Taking the view that administrative rules should be specific, structured, and void of superfluous information, NW Natural encourages staff to consider the editorial comments below. The primary intent of our edits is to move toward a rule that clearly and simply states the key purpose of the rule and eliminates the more procedural references, which are best incorporated into the commission's and the staff's internal operating practices and procedures. Our comments follow:

Paragraph (1): No changes or comments.

Paragraph (2): ~~To request a rule exemption, a person must file with the commission a written request identifying the rule for which an exemption is sought and giving a full explanation of the reason the exemption is requested.~~

All requests for exemptions must be made to the Commission in writing. The request must specify the rule for which an exemption is sought, and must include a detailed explanation of the reasons for such request.

COMMENTS: The term "person" is not used elsewhere in the rules and becomes a new term that if kept, should be defined or clarified. In NWN opinion, it is not necessary to the clarity and understanding of this section to use the term at all. Further, staff's comments state that a customer could request an exemption, yet WAC 480-90-011 Application of rules, state that the rules only apply to the utility.

Also, NWN would suggest that consideration be given to establishing minimum information that would satisfy the commission's expectation of "full/detailed explanation" and incorporating that criteria here. For example, it may be that the commission needs to know if there are cost, revenue, safety, competitive, operational, or other reasons for the request. Other pertinent information may be the time period the exemption is requested to be in effect (i.e. indefinite, six months, 1 year, etc).

Paragraph (3): ~~The commission will assign the request a docket number, if needed, and schedule the request for consideration at one of its regularly scheduled open meetings or, if appropriate under chapter 34.05 RCE, in an adjudication. The commission will notify the person requesting an exemption, and other interested persons, of the date the commission will consider the request.~~

Upon receipt of the request, the commission will determine the appropriate procedural process for review and consideration of the request. The requesting party and other interested parties shall then be notified by the Commission, in writing, of the process and the scheduled review date.

COMMENTS: The proposed draft language contains procedural components that are not necessary to the clarity and purpose of the rule. Assuming that requests made under this rule are usually unique to the requestor, and as such require case specific handling, it is possible that a procedure other than that identified in staff's proposed draft would be appropriate. Keeping the language generic would provide for this case by case flexibility. For example, there in fact may be requests that do not require consideration at an open meeting.

Paragraph (4): ~~The commission will enter an order granting or denying the request or setting it for hearing, pursuant to Chapter 480-09 WAC.~~

The commission will issue its decision in writing, by letter or commission order.

COMMENTS: The reference to setting a hearing is a procedural matter covered under paragraph (3). Paragraph 4 should simply address the issuance of a final decision.

WAC 480-90-016 Saving clause.

No changes or comments.

WAC 480-90-xx2 Resolving disputes about the meaning of these rules.

NWN takes issue with the proposed draft language in that it results in a limited and derogatory rule, particularly by the use of such words as “doubts”, “harmed” and “wrong”. At issue is the fact that there is a question of interpretation. It is irrelevant if it is a doubt, a belief of harm, or that the interpretation is wrong. NWN proposes the following:

~~(1) Anyone who doubts, or believes they are harmed by, a gas utility's interpretation of these rules may ask the commission to decide whether the utility's interpretation is wrong. If the commission finds the utility's interpretation is wrong, the commission will order appropriate relief.~~
~~———— (2) Any gas utility that doubts, or believes it is harmed by, a customer's interpretation of these rules may ask the commission to decide whether the customer's interpretation is wrong. If the commission finds the customer's interpretation is wrong, the commission will order appropriate relief.~~

In the event that the interpretation of any rule in this chapter by a utility or by a customer is in question, the questioning party may request clarification from the commission as to the correct and proper interpretation under the particular circumstance at issue.

WAC 480-90-021 Glossary.

As requested in NWN comments of August 2, 1999, please explain why the terms “Energy assistance grantee”, “Household income”, “Meter tests”, “Payment arrangement”, “Payment plan”, and “Winter period” that are in the electric rule, have not been included in the gas rule.

WAC 480-90-026 Tariffs.

No changes or comments.

WAC 480-90-061 Contract for Service.

The proposed draft language does not accurately or adequately address when the utility can require a written contract. Today, the term “service” is not limited to mean the transaction of the utility's distribution of gas for use by the customer under the terms of a specific rate schedule. It may also refer to the service of constructing the main and service lines prior to use; to providing maintenance, metering, or other services; equipment sales and leasing; and a myriad of other ancillary services that utilities provide today. Limiting this rule to apply only to service where a “specified minimum period” is called for is simply insufficient. NWN proposes the following:

~~A gas utility may execute a contract whenever the classification of service under which the customer or applicant is to be served requires that such service be taken for a specified minimum period. The utility must submit to the Commission a sample copy of each typical contract form currently in use.~~

A utility may require the execution of a written contract or service agreement whenever (a) the class of service so warrants it; (b) whenever the rate schedule under which the applicant or customer is to be served specifies a minimum term of service; or (c) when, in the utility's judgment, the type or conditions of service to the applicant or customer warrant a written contract. The utility shall submit to the Commission a sample copy of each typical contract form currently in use.

COMMENTS: The utility alone does not "execute a contract", the utility may require that a customer execute a contract with the utility. Further, the utility's delivery of gas and the customer's use of that gas in and of itself constitutes a "contract". Therefore, the addition of the word "written" is an important addition.

WAC 480-90-066 Distribution line extension tariff.

Because distribution extensions could be requested/required for existing customers as well as for an applicant, and because the term "facilities" has not been defined, NWN recommends changes as follows:

Each utility must file, as part of its tariff a distribution line extension rule setting forth the conditions under which it will extend its distribution lines ~~facilities to make service available to~~ serve an applicant or customer.

CONSUMER RULES:

WAC 480-90-041 Information to Consumers.

NWN offers the following changes:

- 1 (1) [no changes]
- (2) Each utility must provide to each applicant relevant rate information and a ~~consumer~~ brochure that explains ~~detailing~~ the rights and responsibilities of a utility customer. The ~~consumer~~ brochure must at a minimum, include information about the utility's regular business hours, the mailing address, the 24-hour toll-free telephone number, and the 24-hour emergency telephone number(s) as well as an explanation of the rules that relate to establishing credit, deposits, billing, delinquent accounts, disconnection of service initiated by the company, cancellation of service by the customers, the dispute process, and ~~if the customer is still dissatisfied~~, the commission's informal and formal complaint procedures.

COMMENTS: This section is describing the information to be contained in a brochure, the status of the customer's satisfaction is not pertinent in this rule, and in any event, does not drive whether or not the information on the commission's informal and formal complaint process is included.

(3) [no changes]

(4) The utility must provide an applicant, upon request, ~~a clear summary of the high and low billing period gas usage for each quarter based on the actual consumption of~~ for the applicant's prospective service premise during the prior calendar year.

COMMENTS: NWN has two objections to the proposed rule: (1) that it requires a "summary"; and (2) that it requires quarterly information. To state that the utility will provide a summary implies that a written document is to be created. I think that in reality, such requests are made and responded to in a simple telephone conversation. Further, NWN does not retain this type of information by quarter. We can and do provide two numbers – the high and the low usage – for a calendar year. Programming costs of an unknown amount would be required to provide quarterly data in a written summary; two requirements that, in NWN opinion, is unreasonable, and provides no additional value to the applicant/customer.

(5) The utility must provide a customer, upon request, a detailed account of the customer's actual natural gas usage ~~of at~~ at the service premise for the previous 12 month period.

COMMENTS: The absence of a specified time period would imply that the utility would be required to provide such information for an indefinite time period. Since this is not reasonable, NWN recommends that the time period be specified. We are willing to discuss whether the time period should be less than or greater than 12 months.

(6) [no changes]

WAC 480-90-046 Application for service

We would propose the following changes:

(1) [no change]

(2) The utility may require the following information when an applicant applies for service:

(a) [no change]

(b) [no change]

(c) [no change]

(d) proof of identification, ~~The customer may choose which form of identification to provide to the utility.~~ which may include but is not necessarily limited to a valid Social Security number, a valid Washington driver's license, U.S. passport, certificate of citizenship or naturalization, Immigration and Naturalization Service temporary resident card, employment authorization card, or equivalent photo identification.

(e) spouse and co-customer information, if applicable;

(f) name and telephone number of employer and length of employment;

- (g) type of equipment to be served at the service premise; and
- (h) previous address, length of residence, and utility service information for that address; and
- (i) if renting, the name, address and telephone number of the landlord.

COMMENTS: It is unacceptable to allow the customer to choose which form of identification to provide. Since the reasons for requesting such information in the first place is to protect the utility from fraud, to protect the customer from fraud by someone else, and for the security of both the utility and the customer, it is imperative that the utility be able to have the control over the form of identification that would be acceptable – specifically one that contains a photo and is verifiable if need be.

Further, the additional information suggested is also very important to the utility. The information under (e) is required in the event of separation or divorce, etc., where one person stays at the resident and the other does not and we must know what rights the individual has, and who is responsible for payment. (f) is required in the event telephone contact is necessary given that the majority of our customers work. Employment information is a component of determining credit, and this information is not unreasonable to request. (g) is important to us for safety, service, gas supply planning, and many other reasons. (i) is important in the event a third party notice issue arises.

(3) [no changes]

(4) ~~Under no circumstances will a customer resell natural gas service.~~
Except as specifically authorized in the utility's filed tariff, no gas shall be resold for use by others.

COMMENTS: We believe it is the gas itself that is restricted from resale, not the "gas service". Also, there are situations where resale is appropriate, such as for vehicular use, where the customer may be a filling station.

In any event, NWN questions the inclusion of this paragraph in this rule – it appears out of place. It may even be appropriate to make this a separate rule in itself.

WAC 480-90-051 Deposit Requirements.

The proposed draft language adds the word "security" before the word deposit, thereby creating a new term that has not been defined. It is also a term that, to our knowledge, has not been used in business practices. We would recommend that it be eliminated unless a showing can be made that it provides some additional clarification or value.

NWN continues to find the structure of the proposed draft language awkward

and confusing. We have previously offered suggested language and structure changes which we will not reiterate here (refer to our August 2, 1999 comments), but would request be further considered.

We offer the following additional comments on paragraph (2) Other Requirements:

1. Paragraph (2)(a) refers to a satisfactory credit reference, but all references to establishment of credit have been eliminated. It appears that the word "satisfactory" should be deleted.
2. Paragraph (2)(b) states "full-time" employment with no more than two employers as criteria. NWN believes this is unreasonable. First, many people work only part-time, work two or more part time jobs at once, or are at a career point where multiple job changes in short periods of time are expected. In these cases, this rule would have the utility require a deposit – this is unfair to the customer. NWN suggests that the emphasis be placed on consecutive employment and not on number of employers or full or part time employment.
3. Is it intended that all of the criteria need to be met, or that any one of the criteria needs to be met? If it is the first, then the word "and" should be inserted after each statement. If it is the latter, then the word "or" should be inserted.
4. If the answer to our question 3 is that only one of the criteria must be met, then is it the intent that a customer that owns or is purchasing a home but does not have a job and does not have proof of previous payment history with another utility be relieved of the deposit requirement? This question also applies to a second situation, if they have a utility reference but no job and are not buying a home.

Finally, we have questions about how to administer this rule. These questions are:

1. Why is staff suggesting the number of delinquency notices that trigger a deposit requirement be changed from 3 to 2?
2. When referring to a delinquency notice, is it the first or second notice that is to be considered in applying this rule?
3. When there is a guarantor arrangement, what responsibilities does the utility have to the guarantor about the customer's account information? If they are assuming the responsibility for payment should they be receiving bills and delinquent notices? If not, how is the utility to communicate that the guarantor must make payment?
4. Provide an example of when the alternative to a deposit would be

used and how it would be calculated (paragraph (7)). As far as we can determine, if a customer can't pay a deposit, which is on average, usually less than \$100, how could they possibly be able to pay "installation charges", "service charges" or "budget billings" in advance?

5. NWN views "installation charges" as applying to new service line/main extension installations. What is staff referring to here?

WAC 480-90-056 Refusal of service.

NWN has the following questions and comments:

1. It is noted that the prior draft language included a paragraph (1) that referred to services to master meters, but that such language is not in the current draft. What is the reason for the deletion?
2. NWN objects to the language contained in the proposed paragraph (8) that prevents the utility from refusing service to a customer that owes an unpaid balance. We request that further consideration be given to the changes and additions suggested in our August 2, 1999 comments.

The proposed paragraph (8) blatantly and intentionally places the utility in a position where collection of bonafide amounts due are uncollectible. The information staff is requesting about the number of instances and the amounts caused to be uncollectible in the past is irrelevant when considering whether or not this rule should be changed. What is relevant is the fact that this is unfair to the utility and to the utility's paying customers – is that the message the commission wants to send?

An example of the utility's exposure from this proposed rule follows:

Customer has gas space heating only. On June 5, customer has an unpaid delinquent balance of \$700.00. Customer defaulted on a payment agreement to pay the \$700.00 and ongoing monthly bills. The utility discontinues service to the customer for nonpayment. Customer does not reconnect because the gas is not needed in the summer anyway. The utility closes the account. On November 10 customer requests service be reconnected. The average annual gas bills at the premise is \$500.00. The utility must reconnect the customer for a deposit of \$41.65. The \$700.00 cannot be collected before serving the customer, and can only be collected after serving the customer if it is sent to formal collection. Entering into additional payment arrangements with this type of customer would be futile.

This customer can repeat this action every year indefinitely. As the utility's uncollectible amounts increase, the rest of the utility's customers pay for the increase in uncollectibles in their rates. Even just one occurrence of this action is one too many. The commission's apparent encouragement of this type of customer behavior with this proposed rule is completely inappropriate.

WAC 480-90-071 Discontinuance of service.

NWN offers the following changes and comments:

- (1) [no change]
- (2) (a) After conducting a thorough investigation, it determines the customer has tampered with, or stolen, its property or has used service through an illegal connection;
 - (i) First offense: The utility may disconnect service without notice when it discovers theft or tampering, unless the customer immediately pays:
 - (a) The tariffed rate for service that the utility estimates was used as a result of the theft or tampering; plus
 - (b) All utility costs resulting from such theft or tampering; plus
 - (c) Any applicable required deposit.
 - (iv) Second offense: The utility may disconnect service without notice when it discovers further theft or tampering. The utility may refuse to reconnect service to a customer who has been twice disconnected for fraud subject to appeal to the commission.

COMMENTS: The same remedies that apply to instances of fraud should also apply to instances of theft and tampering.

(2)(b) through (e) [no change]

(2) (f) ~~The utility has determined a customer has used service prior to applying for service. The utility must charge the customer for service used in accordance with the utility's tariffed rate schedule(s);~~

COMMENTS: NWN suggests that this paragraph be removed from this rule. A customer's use of gas service prior to application is not reason for disconnection unless the customer doesn't pay. Is it intended that a customer's failure to apply for service and their subsequent use is reason for disconnection when no other cause exists?

(5) [no changes]

(6) [no changes]

(7) Medical emergencies – When the utility has cause to disconnect or has disconnected a residential service, it must postpone disconnection of service or

must reinstate service ~~within four hours~~ as soon as practicable for a grace period of five business day after receiving either verbal or written notification of the existence of a medical emergency. When service is reinstated the utility will not require payment of a reconnection charge and/or deposit prior to reinstating service but will bill any such charges on the customer's next regular monthly bill. ~~at a later date.~~

COMMENTS: NWN objects to the inclusion of a four hour reinstatement period. This is not reasonable or practical given the many variables involved in getting a service technician to a site at any given time. Stating a specific and limiting time period unnecessarily makes the utility vulnerable to customer complaints.

NWN requests that more specific language be included to specify when the deposit and reconnection charges can be billed, beyond the proposed "at a later date".

NWN has the following additional comments or questions:

1. Why does staff propose a longer certification period of 60 days in place of the current 30 days: paragraph (5)(b)?
2. In paragraph (6)(a)(ii), NWN suggests that the language be revised as follows: (ii) All relevant information about the disconnection action including the amount owing and how to avoid disconnection ~~correct the problem.~~
3. Please explain why staff feels it necessary to identify specific types of medical facilities under paragraph (6)(i)(i), and where staff derived the ones they chose to include. Why these and not others?
4. Please explain why staff feels it necessary to identify specific types of nursing/resident care facilities under paragraph (6)(i)(i), and where staff derived the ones they chose to include. Why these and not others?

WAC 480-90-xx3 Reconnecting service after disconnection.

NWN has the following questions and comments about the proposed rule:

1. What is staff's justification for requiring a one day service restoration? There will be times when this may not be possible.
2. The structure of the introduction paragraph is confusing. Please clarify what is intended.
3. Are all of the four criteria listed intended to be met, or just any one of the four criteria? The words "and" or "or" should be inserted as appropriate.

WAC 480-90-072 Payment arrangements.

NWN has the following questions and comments about the proposed rule:

1. In paragraph (2), NWN objects to the implication that a delayed bill is always due to utility error. There are many reasons a bill may be delayed. NWN requests staff consider language changes to eliminate this implication.
2. In paragraph (3)(a), the words "In general" should be deleted. There is no in general; it is what it is.
3. Paragraph (4) appears to require that in all cases, the utility must enter into a payment arrangement with a customer. What if the customer has a history of habitual non-payment and default of payment arrangements? Does the utility have any recourse or protection from this type of abuse?
4. Referring to paragraph (4)(a), please clarify the statement that a six month payment arrangement is available one time – is it one time in a lifetime, is it one time in a twelve month period, or is it something else? NWN requests staff add clarifying language.

WAC 480-90-xx4 Winter low-income payment program.

No comments.

WAC 480-90-076 Service Responsibilities.

NWN has the following questions and comments:

1. Under paragraph (1), NWN requests staff consider the following edits to the last sentence of the paragraph:
The cost of necessary facilities, if any, will be recovered as provided for in the utility's filed tariff(s).
2. Under paragraph (2), NWN suggests that the word "split" in the second to the last paragraph be changed to "shared".
3. Under paragraph (4), the proposed draft language does not contain the clarifying definitional language contained in the prior draft. This is important language because it excludes interruptible service customers. NWN requests that staff re-insert that language.
4. Did staff intentionally delete the standard pressure requirements language that was contained in the prior draft?

WAC 480-90-081 Service connections.

It does not appear that staff proposes changes to this rule for gas utilities. NW Natural proposed some clarifying changes in our initial comments, and reiterate them here for further consideration.

WAC 480-90-081 Service Line Connections.

~~For the purpose of connecting its distribution system to a customer's premises, A~~ The utility shall furnish, install, and maintain such the pipe and fittings as may be required ~~with the~~

~~following exceptions: to connect a customer's premises to its distribution system, except that the customer may be required to pay for or install at his own expense, in compliance with the utility's standards, the service or any portion thereof in accordance with the utility's filed tariff. Such customer-provided installations shall comply with the utility's standards. The service line piping up to the point of delivery shall become be the property of the utility. who shall accept all responsibility for future maintenance and operation in accordance with its filed tariffs.~~

The utility will not be required to make more than one service line connection to its main to furnish service to the premises of any customer and will not be required to install or maintain pipes for the distribution of gas beyond a single point of delivery to points of use upon the customer's premises.

WAC 480-90-086 Service entrance.

No comments.

WAC 480-90/100-091 Access to premises.

NWN reiterates our concern with the inclusion of language in the administrative rules that requires a customer's property be returned as close as possible to its original condition. This may not always be possible, or practical. It's inclusion in an administrative rule may cause customer expectations to raise to an unreasonable level, and could potentially expose the utility to unnecessary complaints and damage claims.

WAC 480-90-096 Gas utility's responsibility for complaints and disputes.

NWN has the following questions and comments:

1. Under paragraph (3)(a), why does staff propose to reduce the investigation and reporting requirements from 3 days to 2 days?
2. Under paragraph (4), why does staff propose to increase the record retention period from one year to three years?

WAC 480-90-106 Billing requirements and payment date.

NWN has the following questions and comments:

1. Under paragraph (1)(b), the criteria should be expanded to include the words "and payable". With equal payment plans, the amount due is not always the amount payable.
2. Although NWN does currently provide the information stated under paragraph (1)(f), we believe it should not be included in the rule as required billing information – it is informational only, and should be optional for the utility.
3. NWN recommends that consideration be given to eliminating the delineation of each and every piece of required information and replacing it with a simple statement that requires that bills include information sufficient for the customer to compute the amount due.
4. Under paragraph (1)(i)(ii), there are situations beyond the utility's

control where bills are estimated more than two consecutive billing cycles, usually because of access problems. For fairness, this provision should be revised to address such possible occurrences. If the language is not clarified, then what is expected of the utility when more than two consecutive estimated bills would result?

WAC 480-90-161 Complaint meter test (combined rule).

NWN has the following comments and questions:

1. Under paragraph (2), the proposed draft language appears to imply that the customer is required to either witness or have a representative witness the test. I don't believe this is the case, but that it is the customer's choice to do so if they desire. Therefore, NWN suggests language changes as follows:
The customer may, at their option, choose to witness the meter test, or designate a representative to witness the test, and may require the meter be sealed upon removal in the customer's or the representative's presence.
2. Paragraph (6) appears to be a new reporting requirement. Please explain why staff is proposing this new language.

WAC 480-90-211 Payment locations.

NWN has the following questions and comments:

1. NWN requests that paragraph (3) be clarified to indicate that this requirement applies only during normal business hours.

WAC 480-090-xx5 Natural gas customer notification requirements.

NWN has the following questions and comments:

1. Please explain why staff is proposing to move the notification requirements from WAC 480-80 to WAC 480-90
2. Please clarify if paragraph (3) is optional to the utility, such that prior review by the public affairs department is only required when the utility is seeking assistance in crafting the notice.

WAC 480-90-xx7 Purchased gas adjustment.

NWN has the following comments:

1. The term "deferred accounting" is new to the administrative rules, and should be defined in some way.

2. Gas cost adjustments are not always increases. In fact, in the past, NWN has passed through several gas cost decreases. Also, NW Natural reflects its gas costs within its normal rate schedules rather than as an adjustment to its normal rate schedules. Therefore, NWN suggests that the last sentence in paragraph (1) be revised as follows:

Gas utilities must file with the commission for recovery in rates of gas cost changes and accumulated deferred account balances.

METERING & STANDARDS RULES:

WAC 480-90-101 Heating value of gas.

NWN has the following comments:

1. Under paragraph (1), replacing the word “furnished” with the word “delivered” would better reflect the industry terminology.
2. Under paragraph (7), the use of “must be” in this provision is unnecessary. Replacing “must be” with “is” would be sufficient.
3. Under paragraph (8), for accuracy of the provision, it should begin with “For billing purposes,”.
4. Under paragraph (9), for consistency with the title change proposed for this rule, the term “quality test” should be replaced with “heating value test”.

WAC 480-90-126 Meter reading.

NWN has the following questions and comments:

1. The title “Meter reading” does not appear to accurately reflect the content of this rule in that meter reading is not mentioned. NWN suggests that the title be changed to “Metering”.
2. NWN suggests that the first sentence be revised as follows:
The meter is required to record or indicate the volume of gas used, measured in units of cubic feet or other volumetric unit.
3. Does the second sentence in this rule duplicate or conflict with the requirements of WAC 480-90-106?

WAC 480-90-131 Meter charges (Installation of meter set assembly).

NWN has the following questions and comments:

1. NWN suggests simplifying edits to paragraph (1) as follows:
(1) A gas utility will not charge for furnishing and installing the meter to be used to calculate a customer’s gas bill. The utility may charge for additional meters requested by a customer for

non-billing purposes.

2. The language under paragraph (2) seems redundant. The current rule is more accurate in its use of “flat rate service” where “unmetered load” is used in the proposed rule.
3. Under paragraph (1), please clarify if “meter” is intended to include the entire meter set assembly or just the meter.

WAC 480-90-136 Meter set assembly location.

NWN has the following suggested language additions to paragraph (1):

- (1) The customer must furnish a convenient and unobstructed location to install the meter set assembly that is acceptable to the gas utility.

WAC 480-100-141 Meter Identification.

No comments.

WAC 480-90-146 Initial accuracy of meters.

No comments.

WAC 480-90-151 Metering tolerance.

No comments.

WAC 480-90-166 Statement of meter test procedures.

No comments.

WAC 480-90-176 Meter history records.

No comments.

Thank you for the opportunity to comment and to participate in this process. It is likely that we will have additional comments at the upcoming workshops. If you have questions, contact me at 503.226.4211 ext. 3586, or by e-mail at ork@nwnatural.com.

Sincerely,

Onita R. King
Sr. Rate Analyst & Tariff Administrator
Rates & Regulatory Affairs

