

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

NORTHWEST NATURAL GAS
COMPANY dba NW NATURAL,

For an Order Approving Deferral of Costs
and Benefits Associated with the COVID-19
Public Health Emergency

DOCKET NO. UG-200264

PETITION TO AMEND ORDER 01 TO
REFLECT EXTENSION OF CERTAIN
PROVISIONS PURSUANT TO ORDER
06 IN DOCKET U-200281

1 Pursuant to WAC 480-07-370(3) and 480-07-875, Northwest Natural Gas Company (“NW
Natural” or the “Company”) respectfully petitions (“Petition”) the Washington Utilities and
Transportation Commission (the “Commission”) for an Order amending the Commission’s
Order 01 in the above-referenced docket, to reflect the Commission’s extension of the April 1,
2022 date by which NW Natural was to resume the charging of residential late fees,
reconnection fees and residential customer deposits. In particular, per Order 06 in docket U-
200281, the Commission extended the suspension of fees and deposits until 30 days after the
Commission issues an order adopting new rules or otherwise determines the propriety of the
fee and deposit rules in docket U-210800. Because bad debt will likely be affected for a longer
duration as a result of that extension, NW Natural requests to modify its approved timeframe
for the bad debt, late fees and reconnection charge deferral (2020-2022) authorized in Order
01 of docket UG-200264 to now extend to December 31, 2023.

2 In support of this Petition, NW Natural states as follows:

I. NAME OF PETITIONER

3 NW Natural is in the business of furnishing natural gas service within the State of Washington
as a public service company and is subject to the regulatory authority of the Commission as to

its rates, service, facilities, and practices. Its full name and mailing address for the purposes of this proceeding are:

NW Natural
e-Filing for Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204-3038
Telephone: (503) 610-7330
Facsimile: (503) 220-2579
Email: eFiling@nwnatural.com

Kyle Walker, CPA
Rates/Regulatory Manager
NW Natural
250 SW Taylor Street
Portland, Oregon 97204-3038
Phone: (503) 610-7051
Email: kyle.walker@nwnatural.com

4 The name and address of the Company’s attorney for purposes of this proceeding are:

Ryan Sigurdson
Regulatory Attorney (WSBA #39733)
NW Natural
250 SW Taylor Street
Portland, Oregon 97204-3038
Phone: (503) 610-7570
Email: ryan.sigurdson@nwnatural.com

II. SUPPORT FOR PETITION

5 On October 20, 2020, the Commission issued Order 01 in docket U-200281, adopting with modifications a Revised Term Sheet presented by Commission Staff. Included in this Order were several guiding principles related to COVID-19 deferred accounting for “use in evaluating the deferred accounting petitions the utilities have filed or intend to file with respect to their recovery of costs related to responding to the COVID-19 pandemic.”¹

6 On March 25, 2020, NW Natural filed a Petition for an Order Approving Deferral of Costs Associated with the COVID-19 Public Health Emergency. The Company filed a revised petition on November 5, 2020, consistent with the requirements set out in the Revised Term Sheet (“Revised Petition”). In its Revised Petition, NW Natural sought to defer, among other things, any amount of bad debt incurred in 2020-2022 above the bad debt baseline, defined as

¹ *In the Matter of Response to the COVID-19 Pandemic*, docket U-200281, Order 01 ¶23 (Oct. 20, 2020).

the amount then-currently being collected from customers for bad debt, as determined in the Company's last general rate proceeding (as of October 1, 2020). NW Natural also requested deferral of late payment fees and reconnection charges for the calendar years 2021-2022, which is equal to the average annual amount of these fees and charges collected from 2015-2019. In its Order 01, the Commission approved the Company's request to defer late payment fees, reconnection charges and bad debt expense accrued in 2020-2022.

7 On March 29, 2022, the Commission issued Order 06 in docket U-200281, amending its previous Order 03 in that docket and exempting electric and natural gas companies from WACs 480-100-113 and 480-90-113, which authorize electric and gas companies to collect a deposit from residential customers in certain circumstances. These exemptions were set to continue until 30 days after the Commission issues its final order adopting rules or otherwise determines the propriety of the fee and deposit rules in docket U-210800. The Commission's amendments to Order 03 were to extend the suspension of fees and deposits, and to extend reporting requirements, until this same timeframe. Commission Staff's Fourth Revised Term Sheet, provided as Appendix A to Order 06, was reflective of these changes.

8 As a result of the extensions contained within the Commission's Order 06 in docket U-200281, NW Natural requests to modify its approved timeframe of the deferral for bad debt, late payment fees, and reconnection charges (2020-2022) to now extend to December 31, 2023, as these fees, charges, and bad debt will likely be affected for a longer duration as a result of that Commission decision.

III. RELIEF REQUESTED

9 NW Natural respectfully requests that the Commission issue an Order amending the Commission's Order 01 in docket UG-200264 to allow the Company to continue its deferral

of bad debt expense, late payment fees and reconnection charges revenue accrued through December 31, 2023, pursuant to the extensions made by the Commission in Order 06 of docket U-200281 as described in this Petition.

Dated this 15th day of December 2022.

Respectfully Submitted,

NORTHWEST NATURAL GAS COMPANY

/s/ Kyle Walker

Kyle Walker, CPA
Rates/Regulatory Manager
250 SW Taylor Street
Portland, OR 97204-3038
Phone: (503) 610-7051
Email: kyle.walker@nwnatural.com

Ryan Sigurdson
Regulatory Attorney (WSBA #39733)
250 SW Taylor Street
Portland, OR 97204-3038
Phone: (503) 610-7570
Email: ryan.sigurdson@nwnatural.com