

September 27, 2023

VIA ELECTRONIC FILING

Kathy Hunter, Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, Washington 98503

Received
Records Management
Sep 27, 2023

Re: U-210800—NW Natural Response to Notice of Opportunity to File Comments

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), provides the enclosed information as requested in the Washington Utilities and Transportation Commission's August 28, 2023 Notice of Opportunity to Provide Comments, which requested that utilities provide: "a flow chart depicting its collection processes including the key events, triggers, timeframes, and thresholds for each sub-process related to uncollectible arrearage balances after non-payment disconnection."

In response, NW Natural provides the following description of its closed collection process.

Closed Collection Process:

Once an account has been disconnected for non-payment it enters our Closed Collection process. The process is laid out in the visual process flow and summary table below.

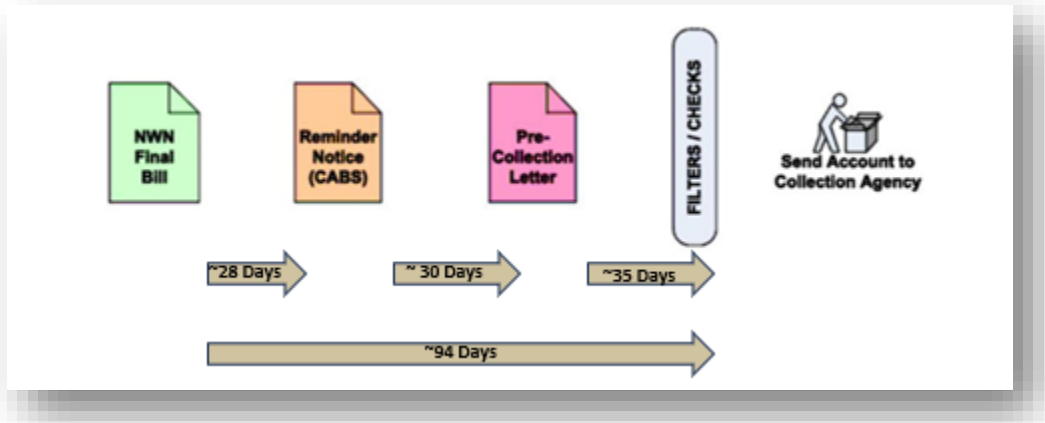
Step 1: A Final Bill is issued on the closed account. This is considered Day 1 of the Closed Account Collection Process. That bill is due in 16 days, with a 7-day grace period.

Step 2: If the Final Bill is not paid by the due date with the grace-period, a Closed Account Bill Statement (CABS) is mailed out on approximately Day 28. This CABS notice is due in 30 days.

Step 3: If the Closed Account Bill Statement is not paid within 30 days a Closed Account Final Notice (CAFN) is sent to the customer on approximately Day 58. This CAFN notices is due in 30 days.

Step 4: If the Closed Account Final Notice is not paid within 30 days the account is eligible to be written off. This eligibility occurs on approximately Day 94.

Please note that weekends and holidays alter the timeline. If the next step in the Closed Collections process falls on a weekend or holiday, we send the notice out the next business day.



Action	Example	Day in Final Process
Final Bill Issued	6/01 (due in 16 days)	Day 1
Final Bill Due Date	6/22 (with 7 -day grace)	Day 22
Closed Account Bill Statement (CABS) Mailed	6/29 (due in 30 days)	Day 29
Closed Account Bill Statement (CABS) and Closed Account Final Notice Letter Sent	8/02 (due in 30 days)	Day 63
Eligible to be Written off to Bad Debt	9/07	Day 99

Other notes:

- Account balances that are \$2.51-\$9.99 receive a closing bill only.
- Account balances that are \$10.00 to \$24.99 receive all notices but do not get sent to a collection agency.
- Account balances that are \$25.00 or higher go through the Closed Account process and are sent to a collection agency.

NW Natural emphasizes that the description above reflects our Closed Collection process. Our active account collection process has previously been provided in this docket in comments provided April 29, 2022 (see Attachment 5 to those comments).

Please address questions and correspondence on this matter to me, with a copy to the following:

eFiling
 NW Natural
 250 SW Taylor Street
 Portland, Oregon 97204
 Fax: (503) 220-2579
 Telephone: (503) 610-7330
 eFiling@nwnatural.com

Washington Utilities and Transportation Commission
U-210800 NW Natural Comments
September 27, 2023, Page 3

Sincerely,

/s/ Natasha Siores

Natasha Siores

Senior Manager, Regulatory Affairs

NW Natural

250 SW Taylor Street

Portland, OR 97204

(503) 610-7074

natasha.siores@nwnatural.com