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**VIA ELECTRONIC FILING**

WASHINGTON UTILITIES &  
TRANSPORTATION COMMISSION  
1300 S Evergreen Park Drive, SW  
Post Office Box 47250  
Olympia, Washington 98504-7250

**ATTENTION: Records Center**

Re: Docket U-131087 – Inquiry to Consider Whether Changes to WACs 480-100-128(6)(k) and 480-90-128(6)(k) are Warranted

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following comments with regard to the above-referenced docket.

NW Natural offers its Washington customers a wide variety of fee-free ways in which to pay their gas utility bill. These options include:

- Mail a check or money order
- Auto pay (automatic deduction from savings/checking account)
- Online payment from savings/checking account or bankcard
- Telephone (Interactive Voice Response “IVR”) payment from savings/checking account or bankcard
- Pay station payment for cash, check, money order or debit card (approximately 37 available locations)

A customer that pays at the time of a field visit intended to disconnect service will pay a \$15 fee in addition to the amount required to keep the service active. The actual cost to make that field visit is about \$32.96.

Generally speaking, the Company’s current practice of accepting field payments is driven predominantly out of compliance with WAC 480-90-128(6)(k). Because there are other more cost-effective and efficient bill payment options available to customers, the Company much prefers that customers use those options.

Although, in NW Natural's experience, accepting a payment at the time of a site visit has some benefits -- the Company is able to mitigate customer service expense by not incurring a second field visit to reconnect service and this field collection helps to reduce bad debt collection expense -- the existing practice of accepting payments in the field creates two undesirable outcomes. First, it creates a safety issue as it heightens the risk of robbery and/or assault on the utility employee and may inadvertently expose a customer to identity theft or other fraudulent act, and second, it sends a message, although probably unintentional, that it is acceptable to use utility employees as personal payment collectors.

The safety issue is self-explanatory – any public situation where an employee carries cash or checks on their person or in their vehicle places that employee at greater risk of being robbed and/or assaulted in the course of doing their job. While field employees are exposed to a certain degree of risk every day, the risk is heightened when money is involved. The safety of customers is also at issue – a stolen check could lead to identity theft or other fraudulent act. Each utility should have the discretion to mitigate employee and customer exposure to this type of risk. Examples of such measures might be to restrict the availability of the field payment option to certain neighborhoods or geographic locations or to documented customer-specific risk situations as needed. The current rule does not afford the utility this option.

The second issue is one that we have noticed regularly occurring over the years - some customers simply become accustomed to waiting until that very last moment to pay their bill because they know that our field service employee will accept their payment. These customers are typically not the customer that is in financial hardship because they pay an additional \$15 fee for this service, and they have the money to pay the bill when we arrive. The use (or abuse) of Company field personnel for payment collection increases costs to all customers. Each utility should be allowed an opportunity to establish cost control measures to prevent this misuse of utility employees. Examples of such measures might be to limit the number of payments per customer per year that it will accept at the door, or to establish a charge for at-the-door payments that exceed some reasonable annual number. The current rule does not afford the utility either of these options.

For the reasons stated above, it is NW Natural's opinion that changes to WAC 480-90-128(6)(k) are warranted. At a minimum, the rule should be revised to: (1) give the utility the discretion to refuse to accept a field payment when in the utility's determination, such action is warranted to mitigate an unsafe condition for its employees or for its customers; and (2) give the utility the ability to limit the number of at-the-door payments it will accept, or to establish a fee to accept an at-the-door payment where the utility has identified repetitive misuse of the disconnect field visit as a payment option.

Thank you for the opportunity to provide comment in this proceeding. We look forward to participating in any future workshops or other proceedings regarding this potential rule change.

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

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If you have questions please call me.

Sincerely,

*/s/ Onita King*

Onita R. King  
Rates and Regulatory Affairs