

Natasha Siores
Manager, Regulatory Compliance
Tel: 503.721.2452
Fax: 503.220.2579
Email: natasha.siores@nwnatural.com



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NWN WUTC Advice No. 20-1

VIA ELECTRONIC FILING

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

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COMMISSION

Re: Schedule B—Bills and Bill Payment Options

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 **March 1, 2020**:

Fifth Revision of Sheet B.1	Schedule B	Bills and Bill Payment Options (optional)
Seventh Revision of Sheet B.3	Schedule B	Bills and Bill Payment Options (optional)
Fourth Revision of Sheet B.4	Schedule B	Bills and Bill Payment Options (optional)
First Revision of Sheet B.5	Schedule B	Bills and Bill Payment Options (optional)

Purpose

The purpose of this filing is to update Schedule B Bills and Bill Payment Options (optional) (Schedule B) to: 1) accommodate new forms of payment, 2) update outdated language related to bankcard payments, paper forms and letters, and 3) streamline the flow of information within the Auto Pay Plan section.

Background

Schedule B provides a general description of the various billing and bill payment options available to NW Natural's customers. In 2020, NW Natural will be working with a new payment processor for transacting payments online. As a result, NW Natural customers will be able to make electronic payments using a variety of methods that are not currently listed in Schedule B. In addition, NW Natural takes this opportunity to remove outdated language and propose changes that streamline the flow of information in Schedule B.

Proposed Changes

NW Natural proposes to update Schedule B to reflect the availability of electronic payment methods, to update other outdated language related to bankcard payments, and to reduce the use of paper forms. In addition, the Company proposes other changes to streamline the flow of information in Schedule B. These changes are described as follows.

Sheet B.1

Applicable section

- NW Natural proposes to remove the statement that customers may use any automated payment option in conjunction with Equal Pay because this language is extraneous; the Auto Pay Plan section provides details about automated payment options that are available to customers, including Equal Pay customers.

Standard Billing and Bill Payment section

- NW Natural proposes to remove the language that delineates specific electronic payment methods. This ensures that new electronic payment methods are not unduly excluded as they become available.
- The Company also proposes to simplify how it describes types of electronic payments, clarifying that customers can make such payments by Automated Clearing House network payments (ACH payments) or by other electronic payment methods (non-ACH payments).

Paperless Billing section

- NW Natural proposes to remove the reference to e-mail with regard to the monthly bill notification, and instead proposes the term “electronic bill notification” to convey that the notification may be provided via email, a text or other electronic means.
- The Company also proposes to remove the sentence that customers selecting paperless billing may choose any payment option because this language is extraneous and does not provide meaningful information. The Auto Pay section provides details about payment options available under Auto Pay.
- NW Natural proposes to add the sentence restricting customers using the Summary Bill service from using Paperless Billing to make the Company’s current practice explicit and transparent in Schedule B.
- NW Natural also proposes to remove the restriction prohibiting customers on Interruptible Service or Transportation Service schedules from using Paperless Billing. This language was previously included in Schedule B due to limitations in the Company’s billing system. However, NW Natural’s system is now able to provide Paperless Billing for these customers and the restriction is no longer applicable.

ACH Payments section

- The Company proposes to move the section entitled “Online Checking Account Payments” from Sheet B.5 to Sheet B.1 and rename it “ACH Payments”.
- NW Natural proposes to revise the language in the section to include payments from savings accounts and to move the language about returned payments into a consolidated Payments Not Honored section discussed below.

Other Electronic (non-ACH) Payments section

- NW Natural proposes to move the section entitled “Bankcard Payment” from Sheet B.5 to Sheet B.1 and rename it “Other Electronic (non-ACH) Payments”.
- Additionally, NW Natural proposes to restrict third-party commercial payers and payment aggregators from using non-ACH payments so that these entities do not benefit from the Company’s fee-free non-ACH payment service.
- The Company proposes to move the language regarding payment failures from this section into a consolidated Payments Not Honored section discussed below.

Sheet B.3

Auto Pay Plan section

- NW Natural proposes to not specify the types of accounts (e.g., checking, savings, or bankcard) that are eligible for Auto Pay so that new payment methods are not unduly excluded as they become available.
- In addition, the Company proposes language to clarify that customers will be providing account information to NW Natural or its authorized payment processor that will be facilitating online payments.

Sheet B.4

Auto Pay Plan (continued) section

- Generally, NW Natural proposes changes throughout this section to continue the use of the ACH and non-ACH terminology as established earlier on Sheet B.1.
- In the Checking or Savings Account (ACH) Eligibility sub-section, NW Natural proposes to have all customers sign up through the Company’s website, and no longer allow customers to submit a written application form to sign up for ACH Auto Pay.

Currently, ACH is the only payment option where customers may submit a written application form. Non-ACH payment methods already require customers to sign up on the Company’s website. Continuing to offer the paper enrollment form for ACH payments presents a risk to the Company and its customers due to the Company receiving its customers’ personally identifiable information.

When the Company goes live with its new payment processor in 2020, customers’ ACH information will move off of NW Natural’s system, like customers’ bankcard information already is. At that time, the Company will no longer have customer personally identifiable information on its systems related to customers’ payment options. This will minimize the risk and burden to customers and will ensure that NW Natural will not be in the position of collecting, processing and storing customer ACH information from paper forms as required by National Automated Clearing House Association Operating Rules.

The Company is mindful that the paper enrollment form may be important to customers wishing to sign up for ACH Auto Pay. As a result, NW Natural's customer contact center is developing a business process to assist customers needing an accommodation to set up ACH Auto Pay by phone.

Currently, the ACH Auto Pay enrollment paper form is printed on the back of customer's bills. The Company has existing printed bill stock that includes the enrollment form that is expected to last until early 2020. If this change is approved, NW Natural would end the paper enrollment when the bill stock is exhausted. To accommodate this, the Company has requested an effective date for the changes to Schedule B described herein of March 1, 2020.

- In the ACH and non-ACH Eligibility sections, NW Natural proposes to move the language regarding returned payments and payment failures into a consolidated Auto Pay Payments Not Honored section discussed below.
- NW Natural proposes to greatly streamline Sheet B.4 by consolidating the language regarding returned payments and payment failures for both ACH and non-ACH payments into the proposed new sub-section Auto Pay Payments Not Honored. This new sub-section simply incorporates the language that existed in Sheet B.4 with regard to Auto Pay returned payments and failed payments, creating a more streamlined flow of information in Schedule B.

Payments Not Honored section

- NW Natural proposes promoting this section to be applicable to the entire Schedule B, which is made possible by the proposed creation of the Auto Pay Payments Not Honored section, and together contributes to the streamlining of information in Schedule B.

Sheet B.5

As described above, the Bankcard Payment and Online Checking Account Payments sections have been renamed and revised and moved to Sheet B.1.

Conclusion

NW Natural believes the changes proposed above will better reflect the bill and bill payment options available to its customers. The Company respectfully requests that the tariff sheets filed herein be approved effective with service on and after March 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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eFiling
NW Natural Rates & Regulatory Affairs
220 NW Second Avenue
Portland, Oregon 97209
Fax: (503) 220-2579
Telephone: (503) 226-4211, ext. 3589
eFiling@nwnatural.com

Respectfully submitted,

/s/ Natasha Siores

Natasha Siores
Manager, Regulatory Compliance
NW Natural
220 NW 2nd Avenue
Portland, Oregon 97209
503-721-2452
natasha.siores@nwnatural.com

Attachments:

NEW-NWN-WUTC-Advice-20-1-Trf-Sheet-B-1-01-10-2020
NEW-NWN-WUTC-Advice-20-1-Trf-Sheet-B-3-01-10-2020
NEW-NWN-WUTC-Advice-20-1-Trf-Sheet-B-4-01-10-2020
NEW-NWN-WUTC-Advice-20-1-Trf-Sheet-B-5-01-10-2020