

March 15, 2024

NWN WUTC Advice No. 24-03

VIA ELECTRONIC FILINGReceived
Records Management
Mar 15, 2024

Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, Washington 98503

Re: Schedule M—Meter Testing Procedures

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 April 29, 2024:

Second Revision of Sheet M.1	Schedule M	Meter Testing Procedures
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Purpose

In compliance with WAC 480-90-343(2), the purpose of this filing is to update the type of meter testing equipment that the Company will be using as listed in Schedule M – Meter Testing Procedures (Schedule M). Additionally, NW Natural provides changes that are housekeeping in nature, including an addition that clarifies its use of third-party testing laboratories in compliance with WAC 480-90-343(1)(c), and a change to remove the reference to WAC 480-90-171 that was renumbered through rulemaking in 2001 to WAC 480-90-348.

Background and Proposed Changes***New meter testing equipment***

Schedule M provides a general description of the Company's meter testing equipment, processes and procedures and reflects the Company's internal Engineering Procedure Z-1, which comports with American National Standards Institute (ANSI) standards. NW Natural is proposing changes to the list of meter proving equipment reflected in Schedule M. NW Natural is purchasing new meter proving equipment primarily due to current equipment obsolescence, as well as cost and technical support considerations.

NW Natural proposes to update the list of meter testing equipment listed in Schedule M to include: Model 6 Dresser Transfer Provers, Bell Provers, Sonic NINE Lift Sonic Nozzle Provers, and Meriam manometers or pressure gauges for differential pressure testing.

Housekeeping items

1. NW Natural has added language to Schedule M describing its use of third-party laboratory testing to augment its own testing. Due to an increased volume in the number of meters needing to be tested, NW Natural has been using third-party meter testing laboratories to augment the Company's own testing. NW Natural uses Honeywell and Energy Solutions, Inc. as needed, to ensure the performance of meter testing at the intervals outlined in WAC 480-90-348. Both companies utilize the same type of meter testing equipment that the Company uses and test to the same standards.
2. Lastly, while reviewing Schedule M for this filing, NW Natural discovered the need to update a reference to WAC 480-90-171, which was renumbered as WAC 480-90-348 in a 2001 rulemaking.

Conclusion

The regulations for meter test procedures outlined in WAC 480-90-343(2) require a gas utility to submit a revised tariff to the Commission whenever it changes any portion of its meter test procedure. NW Natural's Schedule M is in compliance with these regulations.

The Company respectfully requests that the tariff sheets filed herein be approved effective with service on and after April 29, 2024.

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:

eFiling
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Sincerely,

NW NATURAL

/s/ Amy Schulties

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Attachment:

NEW-NWN-WUTC-Advice-24-03-Trf-Sheet-M-1-03-15-24