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May 21, 2001

Secretary
Washington Utilities &
Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket Number U-990294
Gas Companies – Operations Rulemaking 480-90 WAC
WAC 480-90-123 Refusal of Service
WAC 480-90-153 Disclosure of private information

NW Natural appreciates the opportunity to comment in this matter. We have just a few comments and suggested changes with respect to the above-referenced rules.

WAC 480-90-123 Refusal of Service.

Our comments are directed at Section (1)(b) and Section (2)(4).

At Section (1)(b), staff has proposed to remove the distinction between conditions at the premise and safe and satisfactory service associated with equipment. We believe that it is important to retain this distinction. Therefore, we would suggest this section be revised as follows:

(b) In the utility's judgment, there are conditions at the premises that are hazardous, or gas equipment is of such a nature that safe and satisfactory service cannot be provided;

At Section (2)(4). NW Natural has been very vocal about the issue of prior obligations throughout this rule review process. Recently approved changes to the deposit rules (WAC 480-90-113) and the language contained in a new rule regarding reconnecting service after disconnection (WAC 480-90-133) have helped to mitigate our earlier concerns.

Our only comment today is directed at clarity. It is not clear from the proposed rule what remedies are available in the event a customer incurs four or more prior obligations in one calendar year. While we would expect that this situation will be quite rare, it is likely best to address it in the rule now than leave it up for interpretation at a later date.

We are open to discussion on this issue, but offer one possible course of action as follows:

(4) The utility may not refuse service to a residential applicant or residential customer who has three or fewer prior obligations in any one calendar year. A prior obligation is the dollar amount the utility has billed to the customer and for which the utility has not received payment at the time service has been disconnected. The utility may refuse service to a residential applicant or residential customer that has four or more prior obligations in any one calendar year until the customer has paid all prior obligation amounts due.

WAC 480-90-153 Disclosure of private information.

We have no comments or suggested changes to this proposed rule at this time.

Thank you again for the opportunity to comment in this proceeding.

Sincerely,

Onita R. King
Tariff Consultant