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**VIA ELECTRONIC FILING**

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Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

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COMMISSION

**RE: U-180525—Comments of NW Natural  
Rulemaking to Modify Existing Consumer Protection and Meter Rules to  
Include Advanced Metering Infrastructure**

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), appreciates the opportunity to submit these comments in response to the August 14, 2019 Notice of Opportunity to File Written Comments.

NW Natural provides the following comments regarding revised draft rules WAC 480-90-xxxx.

**WAC 480-90-128 Disconnection of Service**

1. WAC 480-90-128(6) – NW Natural reasserts that this language is overly restrictive and prevents the utility from using a technology that has useful safety and cost-savings capabilities. The Company strongly advises against a prohibition for gas utilities to use remote disconnection.

NW Natural reiterates its proposal to add language to the proposed draft rule to allow for a gas utility to implement a remote disconnection program with Commission approval. The Company affirms its proposal to add “without prior Commission approval of a remote disconnection program.” The use of remote disconnection not related to non-payment has the potential to improve the utility’s response to emergency safety issues and better deploy field resources, which would save money for all customers. There are new meters that have the ability to self-shut off when certain thresholds or alarms are activated, such as in the case of physical damage to the meter or a fire. Additional safety issues such as verbal and physical threats to NW Natural’s field personnel could be addressed with remote disconnection. Remote disconnection of meters for occasions other than non-payment would result in a more efficient use of field resources as less truck rolls for disconnections would be needed.

2. In WAC 480-90-128(4), Disconnection notification requirements, part (a), the word “written” should be struck because the second notice described in WAC 480-90-128(4)(ii) may be a telephone notice.
3. In WAC 480-90-128(4)(i) and (ii), NW Natural disagrees with the use of the term “must” with regard to providing the disconnection notices electronically if the utility has such contact information. At a minimum, this term should be replaced with “may.” As the Company has stated in previous comments, this statement presupposes that the utility is able to issue a notice in that form simply because the utility has the information at hand.

In addition, it is NW Natural’s position that affirmative customer consent to receive notices in an electronic form is necessary and, the Company reiterates its previously proposed suggestion that this provision be revised to reference WAC 480-90-179. Lastly, NW Natural continues to assert the administrative burden of requiring duplicate notices in both electronic and mailed/delivered form and incorporates those previous comments by reference.

### **WAC 480-90-178 Billing requirements and payment date**

1. In Section (1)(e), NW Natural suggests the term “only” be removed from the phrase “...provided the customer bill must only provide the meter readings and read date for the final reading for the applicable monthly or bimonthly billing cycle...” NW Natural recommends removal of this term because customer bills may include additional information in certain billing situations, for example, when the bill needs to reflect an open/close of the account or a rate pro-ratio for a rate change.

NW Natural appreciates the opportunity to comment in this proceeding.

If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Natasha Siores*

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