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November 22, 2013

NWN WUTC Advice No. 13-10

VIA ELECTRONIC FILING

Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, SW
Post Office Box 47250
Olympia, Washington 98504-7250

Re: **Optional Automated Meter Reading (“AMR”) Meter Opt-Out**

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), files herewith the following revisions to its Tariff, WN U-6 to become effective with service on and after January 1, 2014 as follows:

Sixth Revision of Sheet iv,
Tariff Index (continued),

Second Revision of Sheet 10.1,
General Rule 10,
“Gas Delivery and Measurement,”

Original Sheet 10.1.1,
General Rule 10,
“Gas Delivery and Measurement (continued),”

First Revision of Sheet C.1.1,
Schedule C,
“Miscellaneous Charges (continued),” and

Second Revision of Sheet C.4,
Schedule C,
“Miscellaneous Charges (continued).”

The purpose of this filing is to revise General Rule 10 and Schedule C of the Company's Tariff to establish a new customer option for the installation at the Customer's residence of a non-AMR meter for billing purposes.

Since the Company transitioned all residential and commercial billing meters to AMR in 2009, the Company has received a limited number of inquiries from residential customers who have expressed concern about the effects of the radio frequency (“RF”) emitted

from the AMR devices. In a few instances, customers have taken it upon themselves to cover the Company's meter with protective screening to shield the RF emissions. The Company is concerned that customer attempts to control the RF emissions on their own could interfere with the AMR device transmissions and cause billing issues, or cause other meter access problems.

While the Company is confident that the RF levels from its AMR meter devices are not harmful, the Company desires to respect the concerns of such customers and provide an alternative metering option that would be available for a fee.

A fee for this service is necessary because when the Company transitioned to AMR metering it also restructured its meter reading practices - the Company now obtains meter reads through drive-by vehicles equipped with devices that receive data transmissions from the AMR devices. Since the Company no longer uses the traditional meter reader to manually obtain a meter read, the Company will be required to make unique accommodations for a customer that requests this optional non-AMR meter installation, and it is the Company's position that the requesting customer should be responsible to pay for the incremental costs associated with providing this service.

Specifically, the Company proposes that a customer that requests a non-AMR meter will incur a one-time installation charge of \$172.00 to cover installation and subsequent removal of a non-AMR meter, and will be subject to a recurrent per bill charge of \$26.55 to cover monthly manual meter readings. The Company has included a work paper with this filing showing the derivation of the proposed charges. In the event that the customer also requests that the meter be relocated, additional charges may apply for the relocation as provided under General Rule 20 of the Company's Tariff.

The Company respectfully requests that the tariff sheet filed herewith be approved to become effective with service on and after January 1, 2014.

As required by WAC 480-80-103(4)(a), I certify that I have authority to issue tariff revisions on behalf of NW Natural.

Copies of this letter and the filing made herewith are available in the Company's main office in Portland, Oregon, and on the Company's website at www.nwnatural.com.

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

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If you have questions, please call me at (503) 721-2452.

Sincerely,

/s/ Onita King

Onita R. King
Rates & Regulatory Affairs

attachments