

June 21, 2022

Received

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Records Management

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

06/21/2022

State of WASH.
UTIL. AND TRANSP.
COMMISSION

**Re: U-210800—NW Natural Response to Notice of Opportunity to File Written
Comments—Supplemental**

Dear Ms. Maxwell:

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or “Company”), provides the following responses to the follow-up questions received from Commission Staff on June 14, 2022 regarding the Company’s previously filed comments in this docket.

Follow-up question: 3. *The response provided for question 3 combines both Washington and Oregon customers. Please provide these numbers for only Washington customers.*

Response:

The estimates for the cost of disconnections and reconnections were calculated using the costs for field work that are not tracked or recorded by state. These costs are typically allocated by state for ratemaking purposes using cost allocation factors. NW Natural believes that the overall average cost per disconnection and reconnection would not materially differ between Oregon and Washington.

Using the “Customers-Residential” allocation factors from the 2018 and 2019 Commission Basis Reports, the cost in tables 3a and 3b allocated to Washington would be as follows. The average cost for disconnection and reconnection in 3c would remain unchanged.

	2018	2019
All disconnections	\$136,985	\$138,924
Disconnections for non-payment	\$97,290	\$96,917

	2018	2019
All reconnections	\$291,543	\$275,633
Reconnections after disconnection for non-payment	\$90,274	\$85,988

Follow-up question: *5b. Is NW Natural able to determine percentage of customers facing disconnection who successfully applied for and received energy assistance that allowed them to avoid disconnection in 2018 and 2019, respectively? Is the company able to at least provide an estimate? If the company is not able to determine this number, please explain.*

Response:

NW Natural does not have information that ties energy assistance (“EA”) payments directly to the cancellation of a collection action, therefore we do not have the requested information to provide. A rough estimate, with strong emphasis on the caveats and assumptions made, is provided below.

Year	Distinct 5-Day Notice Recipients	Distinct Low Income 5-Day Notice Recipients	Distinct Accounts where EA Prevented Shutoffs	Percent of EA Preventions against All Potential Shutoffs	Percent of EA Preventions against Potential Low Income Shutoffs
2018	8,154	207	29	0.36%	14.01%
2019	8,167	161	24	0.29%	14.91%

Assumptions/caveats

- Defined an account “facing disconnection” as one that has been issued a 5-day Urgent Notice in the calendar years of 2018 or 2019 respectively.
- Low income is defined as any *customer* (to accommodate prior obligation) that received Energy Assistance payments during the calendar years of 2018 or 2019.
- If the account was mailed a 5-Day Notice and received an Energy Assistance Voucher in any of the 15 days following the issuance of the 5-Day Notice and where the collection action did not result in a disconnect order or where a disconnect order was issued and subsequently cancelled, they are included as an account that prevented disconnect with EA.

Follow-up question: *17. NW Natural does not provide a response detailing how it determines which languages written communications are provided in. Aside from the insert described in the answer to question 16, it appears that all other written communications are provided in English? If that is not the case, please describe how the company determines which language(s) written communications are provided in?*

Response:

Yes, all other written communications are provided in English. For disconnect notices, we also include the insert mentioned in the response to question 16.

NW Natural appreciates the opportunity to provide additional clarification and information through these responses. Please address questions and correspondence on this matter to the following:

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Sincerely,

/s/ Natasha Siores

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