

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, DBA NW NATURAL,

Customer Notice of Proposed Bill Discount
Program.

DOCKET NO. UG- _____

NW NATURAL GAS COMPANY

PETITION FOR PARTIAL
TEMPORARY EXEMPTION FROM
WAC 480-90-194(3), PUBLICATION OF
PROPOSED TARIFF CHANGES

I. INTRODUCTION

1 Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), respectfully requests that the Commission allow it to provide customer notice of its proposed bill discount program cost recovery tariff, Schedule 231, concurrently with its Purchased Gas Adjustment (“PGA”) filings. In a separate filing, NW Natural has submitted tariffs for a proposed residential bill discount program and program cost recovery under proposed Schedule 231, requested to become effective November 1, 2023. NW Natural intends to provide the notice required under WAC 480-90-194(3) as part of the combined effects of all rate changes expected to become effective November 1, 2023, which includes the Company’s annual PGA. Providing one customer notice comprehensive of all rate changes taking place on November 1, 2023, will result in a more transparent, efficient, and understandable process than would providing separate notices for rate filings that did not occur with the PGA.

2 However, providing a single combined customer notice requires a waiver of WAC 480-90-194(3), subparts (b) through (d) because that regulation requires NW Natural to distribute information regarding the rate change to certain news outlets, community agencies and organizations at the time of filing. But NW Natural cannot provide this notice at the time

of filing because the other rates for the September 15, 2023 PGA filing are not yet known. WAC 480-90-008 provides that the Commission may grant an exemption from any rule in WAC 480-90, including WAC 480-90-194(3), if the exemption is consistent with the public interest, the purposes underlying the regulation, and applicable statutes. This petition describes why a partial, temporary exemption from WAC 480-90-194(3) is in the public interest and why it is consistent with the underlying purpose of the customer notice rules.

II. BACKGROUND

3 NW Natural is a natural gas utility and public service company doing business in the State of Washington and is subject to the jurisdiction of the Commission regarding rates and terms of natural gas service in Washington. The Company's principal place of business is 250 SW Taylor Street, Portland, Oregon 97204. Communications regarding this petition should be addressed to:

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III. DISCUSSION

A. The Temporary Exemption is in the Public Interest.

4 NW Natural plans to provide a comprehensive customer notice inclusive of all rate changes that are expected to take effect on November 1, 2023. This includes the rate changes for the Company's PGA that will be filed on or before September 15, 2023, the Environmental Cost Recovery Mechanism filed earlier this year, and any other tariff filings that may occur. Having one customer notice encompassing all rate changes taking effect on

the same day provides a more transparent, efficient, and understandable message for customers. The Company plans to provide this customer notice as a 15-day notice in compliance with WAC 480-90-194(3). However, WAC 480-90-194(3) subparts (b) through (d) require that the public notice be provided to various parties at the time of the tariff advice filing. NW Natural cannot provide this notice at the time of filing because the rates for the September 15, 2023 PGA filing are not yet known. NW Natural proposes to provide the notice to the parties referenced in WAC 480-90-194(3) subparts (b) through (d) at the time of NW Natural's PGA filing on or before September 15. Consolidating the customer notice is a benefit to customers, and the distribution of the notice to the parties required in subparts (b) through (d) will still occur well in advance of the proposed rate change on November 1. Therefore, NW Natural believes that a temporary exemption is in the public interest.

5 NW Natural also believes that a temporary exemption is in the public interest because consolidating the customer notice for all rate impacts taking effect November 1, 2023 will save the costs of additional notices. NW Natural believes it is in the public interest to have a consolidated customer notice that will result in more transparent and efficient customer notices at reduced costs.

B. The Temporary Exemption is Consistent with the Underlying Purpose of the Customer Notice Rules.

6 The temporary waiver NW Natural seeking is also consistent with the underlying purpose of the customer notice rules. As explained above, providing multiple notices is confusing, duplicative, and increases costs. Simplifying the process by providing a single notice will allow customers to seek the cumulative effect of all rate changes scheduled to

take effect on November 1 and avoids customers inadvertently missing a rate change due to receiving multiple notices in a short amount of time.

IV. CONCLUSION

7 NW Natural respectfully requests that the Commission issue an order allowing for a partial, temporary exemption from WAC 480-90-194(3), specifically subparts (b) through (d). For the reasons provided above, this exemption is in the public interest and is consistent with the with the underlying purpose of the customer notice rules.

Respectfully submitted this 12th day of September 2023.

NW NATURAL

/s/ Ryan Sigurdson

NW NATURAL

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