

Rates and Regulatory Affairs
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September 10, 2010

VIA ELECTRONIC FILING

Dave Danner, Executive Director & Secretary
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
Post Office Box 47250
Olympia, Washington 98504-7250

**Re: U-100523, Paperless Billing for Gas Customers
NW Natural's Comments**

Dear Mr. Danner:

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or the "Company"), hereby submits comments to the Washington Transportation and Utility Commission's ("Commission") draft rules on paperless billing for gas utility customers, issued August 4, 2010.

Attached to this filing are NW Natural's redlined edits to the Commissions' draft rules and below is an explanation of each:

WAC 480-90-XXX - Electronic Information

The wording is revised for greater clarity. Also, the reference to 'applicants' is removed as the utility does not provide bills, notices of tariff revisions or bill inserts to applicants.

NW Natural also requests that Staff clarify whether the list of communications that may be sent electronically is intended to be comprehensive. For instance, does this section allow the Company to send an email notification of a pending service disconnection if the Company also sends a paper copy in compliance with Section 4 of this same rule?

WAC 480-90-XXX (1) - Format of Electronic Communications

The adjectival prepositional phrase "in electronic form" is added for greater clarity. Also, a reference to WAC 480-90 is added as it is the gas utilities' equivalent to WAC 480-100.

WAC 480-90-XXX (2)(a) through (c) - Customer Consent

The title of this section is revised from “Verification of Customer Consent” to “Customer Consent” because the title, “Verification of Customer Consent” is too narrow and misleading as only section (2)(e) (to which the Company objects; see further comments below) is specific to verification.

NW Natural asks Staff to consider the limitation of requiring that the customer consent be either written or verbal as this precludes a utility customer service representative from accepting requests for paperless service over the phone. Asking a customer if they want paperless service upon service initiation would be good customer service. A record confirming a verbal request could be retained as required. NW Natural requests that Staff consider broadening this section to allow for verbal customer consent.

Section (2)(a) is removed because as drafted it is too restrictive and does not conform to commonly acknowledged best practices in web design. It is unnecessarily complicated to have customers navigate through multiple screens to request a service option. Disallowing “any other information” to be presented with customer consent could be interpreted as restricting a utility from including its name, logo or other innocuous navigational information on the webpage. But it clearly disallows a utility from bundling options, such as simultaneously offering paperless billing, auto pay and equal pay. NW Natural has successfully bundled these three offerings in Oregon. This section, as drafted, unintentionally adds complexity to customers’ enrollment process for paperless billing and other service options.

Section (2)(e) is removed as this requirement is wholly unnecessary. It is reasonable to assume customers who are currently receiving a paperless bill are not having trouble with the set-up, otherwise these customers would be getting disconnection notices and the Company would be receiving phone calls. Notification about a service selection made in the past would be confusing. The Company’s billing policies are posted on its website for customers to reference as needed.

WAC 480-90-XXX (3) - Distribution of electronic notices -

WAC 480-90-XXX (4) - Obligation to provide paper documents

WAC 480-90-XXX (5) - Limit on changes to information format –

WAC 480-90-XXX (6) - Electronic Data Interchange (EDI) format –

WAC 480-90-103 - Information to Customers

WAC 480-90-153 – Disclosure of private information

WAC 480-90-178 - Billing Requirement and payment date

No comment.

WAC 480-90-194 - Publication of proposed tariff changes to increase charges or restrict access to services

NW Natural moved the inserted sentence for improved understandability.

WAC 480-90-194(1) - Thirty-day notice to individual customers

WAC 480-90-194 (3) - Reduced publication with shortened notice to individual customers

WAC 480-90-194 (5) and (5)(c) - Optional method of publication for purchase gas adjustment (PGA)

No comment.

NW Natural appreciates the Commission's consideration of the Company's comments. Please contact me at (503) 226-4211, extension 3590 if you have questions.

Sincerely,

NW NATURAL

/s/ Jennifer Gross

Jennifer Gross
Rates & Regulatory Affairs