



# ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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April 16, 2021

**SENT VIA WUTC WEB PORTAL**

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

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COMMISSION

Re: *NW Natural Proposed Revision to Tariff No. WN U-6 to add Schedule K- Covid-19 Assistance Program (CAP)*  
Docket UG-210193

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in advance of the April 22, 2021, Open Meeting. These comments are in response to NW Natural's filing of proposed changes to the Company's tariff WN U-6, to add Schedule K- Covid 19 Assistance Program ("CAP"). Public Counsel appreciates the in-depth discussion and work that was put in through the GREAT Advisory Group, and NW Natural's efforts to elicit feedback from stakeholders.

In accordance with Order 01 in Docket U-200281, NW Natural has developed a bill payment assistance program that will provide relief for income-qualified customers with arrearages resulting from the economic crisis caused by the COVID-19 pandemic. Public Counsel believes this program will help NW Natural's most vulnerable customers reduce their arrearages.

***Public Counsel's Recommendation***

Public Counsel recommends the Commission approve the revisions to Tariff U-6 Schedule K- Covid 19 Assistance Program Plan.

NW Natural plants to identify customers with past-due balances who have received energy assistance since January 1, 2019. The Company will automatically apply CAP funds to those accounts to bring them current via auto-enrollment in the CAP. Customers who have not received energy assistance since January 1, 2019 are still able to apply for energy assistance at their local agency to determine income eligibility and may receive CAP funds directly from NW Natural. CAP funds can be applied to quotes for reconnection after a disconnection for non-payment, once such disconnections resume, or to an arrearage balance on an active account.

To: Mark L. Johnson, Executive Secretary  
Re: NW Natural Gas Tariff Revision to WN U-6 to add Schedule K- Covid-19 Assistance Program (“CAP”)  
Docket UG-210193  
Date: April 16, 2021  
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Public Counsel appreciates NW Natural’s efforts to develop and implement this program, but we strongly encourage the Company to develop a permanent arrearage management program in order to address the long lasting impacts from COVID-19 that will not be addressed by the dollars set aside for this short-term program.

Lastly, Public Counsel encourages NW Natural to provide the data required under Order 01 in Docket U-200281 in advance of the May Open Meeting at which the Commission will evaluate the disconnection moratorium. Providing the data ahead of this meeting will allow the Commission and stakeholders to review and analyze the data to understand how debt assistance programs have assisted customers.

Public Counsel appreciates the opportunity to submit these comments. If you have any questions about this filing, please contact Sarah Laycock at (206) 496-9989 or via e-mail at [Sarah.Laycock@ATG.WA.GOV](mailto:Sarah.Laycock@ATG.WA.GOV).

Sincerely,

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