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October 6, 2025

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: AR 679 – NW Natural Comments

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), provides the following comments on the draft proposed rule amendments ("Draft Proposed Rules") to Oregon Administrative Rules ("OAR") Chapter 860, Division 2 (Alternative Dispute Resolution) ("Division 2 Rules") issued by Administrative Law Judge Michael Grant in this docket on September 11, 2025, as invited by the Ruling issued in this docket on September 30, 2025. NW Natural's written comments support its verbal comments provided during the informal workshop held on September 29, 2025.

The Memorandum Regarding Informal Workshop ("Memorandum"), issued together with the Draft Proposed Rules, provides very helpful background information, explains the reasons for the Draft Proposed Rules, and describes generally the intent of the Draft Proposed Rules.

The Memorandum indicates that the Public Utility Commission of Oregon (the "Commission") and stakeholders have noted difficulty with application of the Division 2 Rules to consumer complaints and declaratory rulings. The Company agrees with the Draft Proposed Rules' elimination of the option for informal resolution of petitions for declaratory rulings because, as acknowledged in the Memorandum, a declaratory ruling is not a suitable action for informal dispute resolution. Moreover, if and to the extent any stakeholder would want to explore the process used to address a petition for declaratory ruling, that can be considered in docket AR 641, which is the Commission's rulemaking proceeding for its Division 1 Rules (General) that includes OAR 860-001-0430 (Petition for Declaratory Ruling).

The Draft Proposed Rules would adopt an informal mediation option for consumer complaints and a formal alternative dispute resolution ("ADR") process for complaints related to the Public Utility Regulatory Policies Act ("PURPA"). As a gas utility, the Company does not have a position on the dispute resolution process used for PURPA-related complaints, which are applicable to electric utilities. As to consumer complaints, rather than including an informal mediation option in the Draft Proposed Rules, the Commission should consider addressing that process in the Commission's Division 21 rules (Utility Regulation), specifically OAR 860-021-0015 (Dispute Resolution), which already sets forth the process to be applied when a dispute occurs between a customer or applicant and a utility.

If the Commission decides to address the dispute resolution process of consumer complaints in the Draft Proposed Rules, the Company comments that Draft Proposed Rule 860-002-0000(1) should retain the reference to Oregon Revised Statute ("ORS") 756.500 as the statutory authority for a

consumer to file with the Commission a formal written complaint against a utility as set forth in OAR 860-021-0015(4).

The Company also comments that Draft Proposed Rule 860-002-0000(2) should be revised by adding the word “confidential” before “dispute resolution” so that the language tracks OAR 860-002-0010(2).

Keeping with the theme of confidentiality, if the Commission were to decide to retain the consumer complaint process in its Division 2 Rules (rather than addressing that process in OAR 860-021-0015, as suggested above), then the Company respectfully requests that the Commission ensure that all written and oral communications made by the parties in preparation of or during the informal mediation option for consumer complaints be subject to the same type of confidentiality protections accorded to the formal ADR process for PURPA-related complaints set forth in Draft Proposed Rule 860-002-0070.

Conclusion

NW Natural appreciates the opportunity to provide these comments and looks forward to actively participating in this docket.

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

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Respectfully submitted,

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