Oregon Public Utility Commission

Specialist: BOYLE, PHIL

Name: DYE, GARY



REGULATED INFORMATION Company: 0001 G NORTHW Open:7/21/2021 pjboyle INET

BILLING NORTHWEST NATURAL Close:8/18/2021 pjboyle INET

Docket #:

Call Taken:7/21/2021 Open Date:7/21/2021

Disconnect Notice Due:

Taken By: BONTRAGER, RICHARD Opened By: BOYLE, PHIL Disconnected: Out of Service:

7/20/2021

CODE DETAIL

Regulated - Information - Billing

Gary Dye is alleging that NW Natural is overbilling customers due to a known inaccuracy in their meters and a faulty methodology for determing BTU factor on bills. The PUC was cc'd on the email from Mr Dye to NW Natural, but has posed our own questions.

7/20/2021 1:27:00 PM

EMAIL FROM CUSTOMER

From: Gary Dye Sent: Tuesday, July 20, 2021 1:27 PM To: mike.mckenzie@nwnatural.com Cc: KOHO Lori * PUC <lori.koho@puc.oregon.gov>; Fred.Boss@doj.state.or.us; PUC CONSUMER PUC * PUC <puc.consumer@puc.oregon.gov>; PUC PUC.PublicComments * PUC <PUC.PUBLICCOMMENTS@puc.oregon.gov>; scott.asphaug@usdoj.gov Subject: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Mike,

The reason I called you yesterday was because I had received some information that indicates that NW Natural has not improved upon its unethical corporate culture that led to my wrongful termination for whistleblowing nine years ago (see attached) when I had your job. I had earlier assumed that NW Natural was going to clean up its act during the 18 months between the time I signed my wrongful termination settlement and the last tranche of money I received from NW Natural. But apparently, that was just wishful thinking. However, I want this to be a positive discourse, and thus I am offering you the same solutions to your current problems that I offered

back in 2012, and I must say, those solutions would save NW Natural a whole lot more money these days, and prevent a whole lot more illegal overcharging of your customers today than back then. Won't NW Natural listen and respond, now that I'm outside your doors?

My first concern and proposed solution is regarding the Meter Sampling Reports of the last few years. (I'm not sure you're aware that I created the Meter Sampling Spreadsheet that you are apparently still using.) About ten years ago, vice-President Grant Yoshihara asked that I make a yearly prediction of how many meters would become non-conforming so as to better plan and budget for future capital expenditures and manpower. To accomplish this, I added a column to the MSP spreadsheet that made a simple extrapolation of the current disposition of the meter families that would predict when the meter family would become non-conforming. At that time, I saw that the first major meter families to become non-conforming (within a few years) was Perf 130 early 1990's, or about 12,000 meters. With this, I came up with the calibration factor (see attached), and was advocating for its adoption to vastly extend our meter lives, and make our customers' billing more accurate in the meantime. However, that was the time when my supervisor (and now, yours) and his boss wanted to shove me out the door, and thus, the calibration factor was not implemented. I was about to advocate for the calibration factor with my peers in the Western Gas Measurement and AGA Distribution Measurement committees, but was removed from those committees during the preparation of my ouster from NW Natural. However, I was told that Sempra Gas had incorporated the calibration factor to take care of the same problem you are now having with the PERF 561 meters. Give Jim Eubanks a call on this.

So, reading your MSP reports for the last few years, you have a real problem. And you must assume that you will soon have another 40,000 Perf 561 meters about to be declared non-conforming that will exacerbate the problem. I do not have access to the meter test results of these non-conforming meters, but if the defect that is causing these meters to prematurely turn non-conforming is gradual and systemic (displaying itself as a bell-shaped curve), then there is no reason to assume that the application of a calibration factor cannot effectively make these meter families conforming again. Further, because of the overwhelming number of non-conforming meters created by PERF 561, you have elected to utilize the 4-year window to have these non-conforming meters removed from the field. But the guestion arises: What about the customers who have these meters on their houses for four years, and are being severely overbilled for the next four years? Doesn't that violate the OPUC rule that says that if there are over 500 customers whose bills are over 2 percent in error, then NW Natural is penalized \$50,000 per month until the error is removed? We are talking about tens of thousands of customers that are being overbilled by well over 2 percent -- for years. I understand that this particular non-conformance is the fault of American Meter Co., but how is it that these customers have to take the hit? Do they really care whose fault it is when they are being overbilled? Are they aware that NW Natural is knowingly overbilling them, and intends to keep overbilling them for the next few years? Isn't the OPUC supposed to protect customers from being overcharged, and not just protect NW Natural? You can protect these customers by implementing the calibration factor, and in the least, you could curtail its domain to only those non-conforming Perf 561 meters that are awaiting removal. (Maybe have a general rollout of the calibration factor after the Perf 561 problem is history?) I think you owe this to your affected customers. Finally, since the time when I conceived of the idea for the calibration factor, I have realized that the population distribution of the error of a meter family is dependent on the total cubic feet that have traveled through the meter

over its lifetime -- this is the cause for the standard deviation of the normal distribution curve). What this means is that the error distribution curve can be normalized with total gas volume, improving the accuracy of every individual meter being virtually calibrated even more than originally conjectured, and reducing the standard deviation of the error distribution curve, essentially making these meters last forever. (Some other condition other than measurement error would trigger their removal.) Let me know if you need help with this.

My second concern involves the BTU factor that is assigned for the therm calculation for every customer. I have attached emails that expressed my concern of this issue during the last days of my employment at NW Natural. (FYI, these emails led to my termination.) The issue then was the inability of the BTU Zone Spreadsheet to adequately and accurately assign the BTU value for those customers between the low-BTU-value Mist wells and west Portland customers. NW Natural had two projects in the works which would vastly expand Mist gas to Salem and east Portland. The BTU spreadsheet could not credibly assign a proper BTU value to those customers that were going to get Mist gas via these two projects. For the previous 12 years of my employment, I had been advocating vociferously for a daily Stoner-based modeling of our system that would assign plat-average BTU values, replacing the discredited spreadsheet. But management did not want to spend the money to create a credible system that would ensure BTU-value accuracy for its customers. Today, the situation has expanded. I have been unable to obtain any information that would explain why the BTU Factor on my monthly gas bill is as high as it is. It now hovers around 1.080 rather than 1.030, which represents a 5 percent difference in the therm calculation. and my bill. I assume what is going on is that the gas coming down from Canada is especially hot due to the construction of an LNG plant and port. But the problem is, while I was working at NW Natural, and was the technical custodian of the BTU Zone spreadsheet, I would observe the gas front between the gas coming down from Canada and over from Colorado would swing back and forth inside of NW Natural's service territory, with each interstate pipeline gate station susceptible to switching between the two sources of gas as the gas front passed by. With this shift in position of the gas front going on, coupled with a big difference in BTU value of the two sources of gas, the difference in heating value that a gate station experiences becomes significant (five percent?). whereas this didn't used to be the case nine years ago (less than one percent). Thus, the BTU Zone spreadsheet becomes even more inadequate and completely lacking in credibility, as it cannot address any gas front within its zone (the basis of the problem with the static boundaries of the zones in the spreadsheet), and this now occurs for the majority of NW Natural's customers, not just those in southwest Portland, Salem, and east Portland. Many might be paying 5 percent too much for their gas, while many are paying 5 percent too little. This is not a problem for NW Natural's balance sheet, because these errors in customer's bills (calculated therms) cancel each other out over the aggregate, and what doesn't get cancelled out gets taken care of by the annual UAG subsidy. But what about the individual customers that are affected? Thousands of customers might be overbilled by as much as 5 percent, and the gas company is showing that it doesn't care about them? And the OPUC is supposed to be taking care of them. Do you see the The solution to this problem is to PR and possible legal problem of not taking care of this issue? adopt Stoner modeling, as mentioned in the attached emails. Just do it!

It is my hope that NW Natural finally wakes up from its ethically challenged corporate culture, and give billing accuracy its proper attention -- and quit trying to hide things from the public! It really doesn't have to subtract much from your profits, if NW Natural only drops its hostility to innovation,

smart solutions, and those employees that have a passion for getting NW Natural to do the right thing.

Let me know if I can be of further help.

Gary Dye (503) 970-4249

7/21/2021 2:03:00 PM EMAIL TO LORI - PROPOSED EMAIL TO NWN

From: BOYLE Phil * PUC Sent: Wednesday, July 21, 2021 2:03 PM To: KOHO Lori * PUC <Lori.KOHO@puc.oregon.gov> Subject: FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Lori,

Here is a draft email I plan to send to NWN about these issues. Do you think I have fully captured the issues? Any suggestions?

Phil

Good afternoon Natasha,

While Mr. Dye's email was not address directly to the PUC, as we were cc'd we are interested to learn more about the allegations Mr. Dye is making against the company. Please comment on the various allegations he is making with regard to meter accuracy and determination of the BTU factor. Specifically, please comment on:

1. An alleged defect that is causing meters to turn non-conforming prematurely. What is this defect and is Mr. Dye correct?

2. If there is such a meter defect that is causing billing inaccuracy beyond the 2% allowance, how many customers may be impacted and to what extent dollar wise? Are customers being overbilled? If so for how long?

3. Please explain how the BTU Factor is determined for customer bills. Does the factor vary from location to location? Explain why.

4. What is the Stoner Model?

Depending on what you report back, the PUC may ask the company to undergo an independent evaluation of company calibration methodologies and standards.

Please report back by July 30th.

Thanks Natasha, Phil

7/21/2021 2:06:00 PM EMAIL FROM LORI - LOOKS GOOD

From: KOHO Lori * PUC <lori.koho@puc.oregon.gov> Sent: Wednesday, July 21, 2021 2:06 PM To: BOYLE Phil * PUC <Phil.BOYLE@puc.oregon.gov> Subject: RE: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Thanks Phil!

Looks good. Just a typo in red. We'll get something officially in our system.

Lori Koho 503-576-9789

7/21/2021 2:12:00 PM

EMAIL TO COMPANY - QUESTIONS

From: BOYLE Phil * PUC Sent: Wednesday, July 21, 2021 2:12 PM To: Siores, Natasha <Natasha.Siores@nwnatural.com> Cc: KOHO Lori * PUC <Lori.KOHO@puc.oregon.gov> Subject: FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Good afternoon Natasha,

While Mr. Dye's email was not addressed directly to the PUC, as we were cc'd we are interested to learn more about the allegations Mr. Dye is making against the company. Please copy me on any response you make to Mr. Dye, and separately provide us comments on the various allegations he is making with regard to meter accuracy and determination of the BTU factor. Specifically, please comment on:

1. An alleged defect that is causing meters to turn non-conforming prematurely. What is this defect and is Mr. Dye correct?

2. If there is such a meter defect that is causing billing inaccuracy beyond the 2% allowance, how many customers may be impacted and to what extent dollar wise? Are customers being overbilled? If so for how long?

3. Please explain how the BTU Factor is determined for customer bills. Does the factor vary from location to location? Explain why.

4. What is the Stoner Model?

Depending on what you report back, the PUC may ask the company to have an independent evaluation of company calibration methodologies and standards.

Please report back by July 30th.

Thanks Natasha, Phil

7/21/2021 6:02:00 PM EMAIL FROM COMPANY - WORKING ON RESPONSE

From: Siores, Natasha <Natasha.Siores@nwnatural.com> Sent: Wednesday, July 21, 2021 6:02 PM To: BOYLE Phil * PUC <Phil.BOYLE@puc.oregon.gov> Cc: KOHO Lori * PUC <lori.koho@puc.oregon.gov> Subject: RE: [External]FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Hello Phil and Lori,

Thank you for flagging this. Our engineering folks have already been working on this issue and we should be able to respond to these questions and provide information next week as requested. I appreciate you flagging so we can loop in the regulatory folks and get some process around this. Thanks!

Regards, Natasha

7/22/2021 1:51:00 PM

EMAIL FROM MR DYE TO NWN

From: Gary Dye

Sent: Thursday, July 22, 2021 1:51 PM

To: mike.mckenzie@nwnatural.com; KOHO Lori * PUC <lori.koho@puc.oregon.gov> Cc: rick.mooney@americanmeter.com; Fred.Boss@doj.state.or.us; PUC PUC.PublicComments * PUC <PUC.PUBLICCOMMENTS@puc.oregon.gov>; PUC CONSUMER PUC * PUC <puc.consumer@puc.oregon.gov>; PUC_Commission PUC <PUC_puccomm@puc.oregon.gov>; scott.asphaug@usdoj.gov; jon.huddleston@nwnatural.com Subject: FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Do you think this is going to go away, like what you accomplished 9 years ago? (It's not, this time.)

You have to realize that these tens of thousands of customers that you have overbilled, and will continue to overbill for the next four and more years, can be a part of a class-action lawsuit. Do you think an attorney might want to take up this lawsuit? What if he realizes that American Meter Company has sold these defective meters all over the country, and might have millions of people who are currently being overbilled? That's a lot of contingency fees! And it would be a pretty easy lawsuit to file and get members of the affected class signed up. Matter of fact, all he would have to do in the discovery process -- I remember a little bit from my law school days -- is for NW Natural to hand over all the names and addresses/email addresses/phone numbers of your customers that currently have these overbilling meters (Perf 561, at least) on their houses (as has been filed with the OPUC), and then to send a letter to all these customers informing them that they are knowingly being overbilled. Join our lawsuit! And then, after American Meter Company is subpoenaed for all the sales information of AC-250 meters sold across the country, those future members of the class

can also be contacted and become members of the lawsuit. It will go national! Do you think any newspaper or TV reporter would be interested in this lawsuit? Do you think they might wonder why a lawsuit is needed, given that the OPUC is supposed to protect the consumer from transgressions of the regulated utility? What are the other transgressions, anyway? (I have my own list from nine years ago.) Maybe CUB and NWIGU might be interested (at least in the BTU-value issue). Do they or their members know about any of this? Do they want to join the class-action lawsuit (albeit, for different reasons)?

You need to show some courtesy toward me in answering my questions and considering my solutions to your problems. I need this courtesy by Friday. If I don't hear anything, I'll be turning this matter over to an appropriate class-action attorney. You can then deal with him. And by the way, I have a Perf 651 meter sitting on my house that I built in 2008. That means, not only will I offer my services as an expert witness (Do you think I'd perform well in that role?) in the class-action lawsuit, but my name will be on the lawsuit representing all the members of the class. Sounds like a lot of fun!

Gary Dye

PS I haven't forgotten how I was treated those twelve years employed by NW Natural, and especially, how I was treated during those last months when all I wanted the Company to do was to address and fix all those ethical violations that I had reported. Instead, you fired me, you destroyed my career as an engineer, you hired a psychiatrist to label me as a violent threat to the workplace, contributing to my severe financial harm, and the breakup of my marriage and family. That's what a corrupt corporation does to a whistleblower, and what a corrupt government agency does as they sit back and watch all this unfold. And let the good times roll for all those personally profiting off of the graft. You can bet that I have the resolve to see this matter through.

7/22/2021 2:00:00 PM EMAIL FROM LORI - I WILL ADVIDE BRYAN AND MIKE G

From: KOHO Lori * PUC <lori.koho@puc.oregon.gov> Sent: Thursday, July 22, 2021 2:00 PM To: BOYLE Phil * PUC <Phil.BOYLE@puc.oregon.gov> Subject: FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Just so you know. I also forwarded to Bryan and MikeG.

Lori Koho 503-576-9789

Note: Lori references the emails from Mr. Dye dated July 20 at 1:27 PM and July 22 at 1:51 PM.

7/27/2021 5:14:00 PM EMAIL FROM COMPANY - RESPONSE TO PUC QUESTIONS

From: Siores, Natasha <Natasha.Siores@nwnatural.com> Sent: Tuesday, July 27, 2021 5:14 PM To: BOYLE Phil * PUC <Phil.BOYLE@puc.oregon.gov>

Cc: KOHO Lori * PUC <lori.koho@puc.oregon.gov> Subject: RE: [External]FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Hello Phil and Lori - please see below responses to the questions Staff posed. We note that the concerns raised seem to be the same as those raised before the individual left the Company in 2013. Then, as now, we find that any issues have been addressed and that we are operating our metering methodology and standards in compliance with applicable tariffs, OARs and engineering standards. I've included our Engineering Standard Z-1 that is referenced in the responses below.

As requested, we will copy you on any response we might send to Mr. Dye.

Please let us know if you have additional questions. We're happy to set up time to discuss any follow-up - thanks.

Response:

1. Regarding the alleged defect causing meters to turn non-conforming prematurely, Mr. Dye is referring to an alleged defect in the construction of 250 class meters. Through our meter sampling program, NW Natural has identified meter families from Honeywell/American and Sensus that have been determined non-conforming before the end of the 15-year meter warranty period. NW Natural has secured a warranty agreement with Honeywell acknowledging the meter families in question are non-conforming, and a warranty claim with Sensus is ongoing, pending in-testing of meters removed from the field. Neither manufacturer has acknowledged specific components or failure modes, only that the meters sold have become non-conforming within the warranty period.

NW Natural performs normal meter testing procedures as described in Commission-approved tariff Schedule M, and according to NW Natural Engineering Procedure Z-1 (attached). The primary purpose of this statistical sampling program is to determine if groups (commonly called families) of meters meet performance standards by using smaller, random lots of meters from each group. These samples of meter data are evaluated according to guidelines set forth in ANSI/ASQ standard Z1.4, and ANSI B109.1 and B109.2, which governs diaphragm type gas meters. Each meter family is evaluated yearly, and a determination of conformance is made based on the previous five years of statistical sample data. Meter families that do not meet performance criteria specified in Engineering Procedure Z-1 are scheduled for removal. When the total number of meters to remove exceeds 3% of the total meter population, NW Natural may elect to utilize 4 years for removal consistent with both Engineering Procedure Z-1 and our tariff Schedule M, which has been the case for two most recent meter sampling program years, 2019 and 2020.

2. As referenced in RG 41: Meter Sampling Program Report for 2020, at 2020 year end, 43,008 meters remained for removal by December 2023. This includes 15,084 meters from the 2019 meter sampling program, and 27,204 from the 2020 meter sampling program. Given four years for removal from the date at which they were determined, meters from the 2019 sampling program are scheduled to be removed by December 2023, and meters from the 2020 program will be removed by December 2024.

Of these meters, the 2019 sampling program identified 22,887 American AC-250s with a family year of 2008 as non-conforming before the end of the warranty period. The 2020 sampling program identified 13,443 of the 2009 American AC-250 and 7,584 Sensus R-275 meters with a family year of 2006 as non-conforming before the end of the 15-year warranty period. Removal of these meters from service is ongoing.

When meters are removed from the field, they are tested. The test results are evaluated to determine if a customer should receive a bill credit for a fast meter, or a charge for a slow meter based on thresholds set in OAR 086-021-0135. If those thresholds are met, customers receive a credit or a charge for the previous six months of usage based on the percentage error determined when testing the meter, as it is not possible to determine the date at which the meter became non-conforming. Per NW Natural bill correction rules, if an aggregate overbill for the previous six months exceeds \$3.00, the customer receives a bill credit for the overbill. For slow meters, the aggregate underbill must exceed \$10.00.

For January 2019 to date, NW Natural has processed 9,218 bill credits for commercial and residential customers, averaging \$7.73 per month for commercial customers and \$1.61 per month for residential customers. This excludes accounts where the total credit was less than \$3. There were a significantly smaller population of slow meters, for January 2019 to date, 140 commercial and 222 residential exceeding \$10 total underbill. The average charge for commercial was \$45.67 per month and \$4.67 per month for residential.

When evaluating in-test data (to date) from 21,267 meter tests of the meter families determined non-conforming before the end of the warranty period referenced above, meter error rates range from 2.4% to 2.53% fast. Engineering Procedure Z-1 specifies conforming meter families to be within +/- 2%.

3. NW Natural's portfolio of supplies include Portland LNG, Newport LNG, Mist Underground Storage, Renewable Natural Gas and Northwest Pipeline basin gas from the Sumas and/or Rockies. Each supply source has distinct constituents which produce unique BTU values. The diversification of supply sources along with the interconnectivity of the distribution system creates BTU fronts that fluctuate daily on the gas system. Throughout a gas day, customers can receive supplies from a single source or a blend of multiple sources. Depending on the supply source, areas on NW Natural distribution system may experience differing BTU gas from day to day.

In 2012, NW Natural developed a BTU calculation process to establish daily average BTU conversion factors to more accurately bill customers based on the BTU content of the gas they consume. Because of the dynamic shifts in BTU content on the system, a BTU model is created every day to capture average daily BTU values. The BTU calculation process is performed by Engineering to generate a BTU billing file that contains the average daily BTU value for each plat sheet on NW Natural's system. Customer metering equipment measures volumes of gas whereas customers are billed in thermal units. The purpose of the BTU billing file is to provide a conversion factor from volumetric units to thermal units to appropriately bill customers based on the heat content of the gas they consumed during a billing period.

Each morning, flow, pressure and supply BTU values for points on NW Natural's system are

imported into the Synergi Gas software (previously referred to as the Stoner model), which is modified to match data collected for the gas day. After this data is imported, the Synergi hydraulic model is tuned to match the model to actual gas flows. Synergi's tracing feature provides an accurate representation of average flows and BTU in the system for the gas day. The Synergi model is used to identify the average BTU for every plat on NW Natural's system, and this is exported for billing on a plat-by-plat basis. The NW Natural plat system represents a half mile grid section, meaning each half-mile square section of the piping system is assigned a unique average BTU. This model has been in use since 2012.

NW Natural's Billing Department conducts daily error checks on the BTU billing file to assure that the BTU calculation process is completed and that the BTU values found in the BTU billing file are within an acceptable range and consistent with our tariff Rule 24.

4. The Stoner Model is the previous name of the Synergi Gas hydraulic model referenced above, in response to question #3.

Regards, Natasha

Natasha Siores NW Natural - Manager, Regulatory Compliance w: 503.610.7074 nwnatural.com

7/28/2021 7:58:00 AM EMAIL TO LORI - WHAT DO YOU THINK?

From: BOYLE Phil * PUC Sent: Wednesday, July 28, 2021 7:58 AM To: KOHO Lori * PUC <Lori.KOHO@puc.oregon.gov> Subject: FW: [External]FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

What do you think of their response? It makes sense to me but I am not an engineer. Not sure I see any rule violations here. - Phil

Note: Phil references the email response from NWN dated July 27, 5:14 PM

8/17/2021 11:04:00 AM EMAIL TO NWN - HAVE YOU RESPONDED TO MR DYE?

From: BOYLE Phil * PUC Sent: Tuesday, August 17, 2021 11:04 AM To: Siores, Natasha <Natasha.Siores@nwnatural.com> Cc: KOHO Lori * PUC <Lori.KOHO@puc.oregon.gov> Subject: RE: [External]FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Hi Natasha,

Did you ever send a response to Mr. Dye?

Phil

8/17/2021 4:18:00 PM EMAIL FROM NWN - WE CHOSE NOT TO RESPOND

From: Siores, Natasha <Natasha.Siores@nwnatural.com> Sent: Tuesday, August 17, 2021 4:18 PM To: BOYLE Phil * PUC <Phil.BOYLE@puc.oregon.gov> Cc: KOHO Lori * PUC <lori.koho@puc.oregon.gov> Subject: RE: [External]FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Hi Phil,

I confirmed with the team that we chose to not send a response in this case. Should that change, I will keep you updated. Thanks!

Regards, Natasha

8/18/2021

CASE CLOSED

8/18/2021 7:14:00 AM

EMAIL TO NWN - CASE CLOSED

From: BOYLE Phil * PUC Sent: Wednesday, August 18, 2021 7:14 AM To: pucd@nwnatural.com Cc: Siores, Natasha <Natasha.Siores@nwnatural.com> Subject:

Attached is your copy of this now closed Information case. No action to be taken. - Phil

9/11/2021 7:19:00 AM

EMAIL FROM CUSTOMER - HEADS UP

From: Gary Dye Sent: Saturday, September 11, 2021 7:19 PM

To: PUC CONSUMER PUC * PUC <puc.consumer@puc.oregon.gov>; PUC PUC.Survey * PUC <PUC.SURVEY@puc.oregon.gov>

Subject: FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Here was my complaint. Please read from the bottom up. I'm in the process of broadcasting this complaint to the media and elsewhere. I wanted to give you a heads up before questions are raised.

Gary Dye

9/13/2021 8:00:00 AM

EMAIL TO CUSTOMER - THANK YOU

From: BOYLE Phil * PUC Sent: Monday, September 13, 2021 8:00 AM To: Gary Dye Subject: RE: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

Thank you.

Phil Boyle OPUC

9/13/2021 8:01:00 AM

EMAIL TO COMPANY - FYI

From: BOYLE Phil * PUC Sent: Monday, September 13, 2021 8:01 AM To: Siores, Natasha <Natasha.Siores@nwnatural.com> Subject: FW: Concerns and Solutions for NW Natural's Metering and BTU Factor Inadequacies and Customer Overbilling

FYI - Phil

Attachments to Case:

7/21/2021 3:01:23 PM	CalibrationFactorOPUC2
7/21/2021 3:02:08 PM	FW Enerfin Production gas for BTU zones
7/21/2021 3:02:42 PM	Update on Ethical Allegations
7/21/2021 3:03:12 PM	RE Follow-up on Phone Call
7/21/2021 3:03:50 PM	PaidAdminLeave
7/21/2021 3:04:00 PM	Termination0002
7/21/2021 3:04:48 PM	Termination0001
7/21/2021 3:05:15 PM	MSPreport2020
7/21/2021 3:05:47 PM	LatestSOXBTUspreadsheet.Ver8 20060919
7/21/2021 3:06:13 PM	ethics0001
7/21/2021 3:06:39 PM	Blue Heron Paper
7/27/2021 11:35:00 AM	NWN Engineering Procedure