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Hon. Joel H. Peck, Clerk  
State Corporation Commission  
Document Control Center  
Tyler Building, First Floor  
1300 East Main Street  
Richmond, Virginia 23219-4074

**Re: Petition of Roanoke Gas Company  
For a temporary waiver of tariff provisions  
Case No. PUR-2020-000 65**

Dear Mr. Peck:

Enclosed for filing is the Petition of Roanoke Gas Company for a temporary waiver of tariff provisions.

Please do not hesitate to contact me if you have any questions.

Best regards,



James G. Ritter

Enclosure

cc: Certificate of Service

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

PETITION OF

ROANOKE GAS COMPANY

CASE NO. PUR-2020-00065

*For a temporary waiver of tariff provisions*

**PETITION AND REQUEST FOR EXPEDITED CONSIDERATION**

With this Petition, Roanoke Gas Company (“Roanoke” or “Company”) requests that the State Corporation Commission (“Commission”) grant a temporary waiver of certain provisions of the Company’s Rate Schedule WNA. For reasons discussed below, Roanoke requests that the Commission grant the requested waiver on an expedited basis. In support of this Petition, Roanoke states as follows:

1. Roanoke is a Virginia public service corporation engaged primarily in the retail distribution and sale of natural gas to residential, commercial, and industrial customers in southwestern Virginia. The Company’s gas utility markets include the Cities of Roanoke and Salem, and the surrounding regions including Roanoke and Franklin Counties and portions of Bedford, Botetourt, and Montgomery Counties in Virginia.

2. Roanoke recognizes that the public health emergency caused by the novel coronavirus (“COVID-19”) could have significant financial consequences for some of its customers. Consistent with the Commission’s recent orders in Case No. PUR-2020-00048 (“Suspension Orders”), Roanoke on its own initiative has temporarily suspended all service disconnections for non-payment and has stopped assessing late fees on payment arrearages that

arise as a result of the COVID-19 emergency.<sup>1</sup> The Company will keep these suspensions in place in accordance with the requirements of the Commission's Suspension Orders.

3. In this Petition, Roanoke requests a temporary waiver of certain provisions of its Rate Schedule WNA, which governs the Company's Weather Normalization Adjustment ("WNA"). In particular, the Company seeks a waiver of Section 4 of Rate Schedule WNA, which states that any billing adjustments for the relevant WNA year—which begins April 1 and ends March 31—"are to be applied to the customer's bill between [the following] May and August." Under the terms of Rate Schedule WNA, when the WNA year is colder than normal, customers receive a credit to their bills, and when the WNA year is warmer than normal, customers receive a charge on their bills.

4. Roanoke has prepared its annual WNA calculation for the most recent WNA year (April 1, 2019 through March 31, 2020). Because weather conditions during the WNA year were warmer than normal, customers will receive charges to their bills as a result of the adjustment. According to the terms of Section 4, the charges must be applied to customers' bills between May and August of this year.

5. In light of the current public health emergency and the financial pressures that these additional charges could impose upon customers at this time, Roanoke requests a waiver of Section 4 to allow the Company to defer implementation of the WNA charges to a later date. Roanoke further requests that the Commission grant it the flexibility to determine, in coordination with the Commission Staff, the appropriate time at which to implement the charges as well as the manner in which they will be implemented. The Company is currently evaluating

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<sup>1</sup> *In re: Temporary Suspension of Tariff Requirements*, Case No. PUR-2020-00048, Order Suspending Disconnection of Service and Suspending Tariff Provisions Regarding Utility Disconnections of Service (Mar. 16, 2020) and Order Extending Suspension of Service Disconnections (Apr. 9, 2020).

those options and will continue to do so as the COVID-19 emergency unfolds and more information becomes available. For example, one possible approach would be to defer the charges until some period of time—perhaps thirty, sixty, or ninety days—after the current state of emergency in Virginia (including any extensions) comes to an end. Or, the Company could determine that the charges should be implemented over a longer period of time than the Tariff permits, which also would mitigate the financial impact upon customers. Given the uncertainty surrounding the COVID-19 emergency, Roanoke requests that the Commission grant the requested waiver in a manner that allows it the flexibility to determine the appropriate course of action in consultation with the Commission Staff.

6. If the Commission grants the requested waiver and authorizes Roanoke to defer the WNA charges to a later date, the Company will include a message in all customers' bills notifying them of the change. The Company will include the message on customers' bills as soon as practical following the Commission's approval of the waiver and will provide proof of this notice to the Division of Public Utility Regulation within ten days of completing the notice.

7. Section 4 of Rate Schedule WNA requires that the WNA charges be applied to customers' bills beginning in May, or less than one month from now. As a result, Roanoke requests that the Commission grant the requested waiver on an expedited basis.

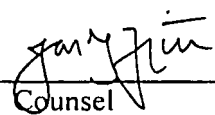
8. Roanoke has discussed this request with the Commission's Staff, and Staff has authorized the Company to represent that it does not oppose the requested waiver.

WHEREFORE, Roanoke respectfully requests that the Commission grant a temporary waiver of Section 4 of Rate Schedule WNA to allow the Company to defer the WNA charges until a later date. The Company also requests that the Commission grant it the flexibility to

determine the appropriate future time at which to implement the WNA charges and the manner in which to implement these charges.

Respectfully submitted,

ROANOKE GAS COMPANY

By:  \_\_\_\_\_  
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*Counsel for Roanoke Gas Company*


Dated: April 13, 2020

CERTIFICATE OF SERVICE

I certify that on April 13, 2020, a copy of this document was served by hand delivery, electronic mail, or first-class mail, postage prepaid, on:

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Richmond, VA 23219

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