

November 28, 2022

VIA ELECTRONIC FILING

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

RE: UM 1158 / UM 2195 HB 3141 Equity Metrics – NW Natural’s Comments

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), files herewith its comments on Staff’s Proposed Equity Metrics.

1. Theme 1: The Equity Metrics that Staff proposed appear to be more guidelines than actual metrics. NW Natural is supportive of increase access to information, however, it is unclear how progress will be measured for Theme 1.
2. Theme 2: Theme 2 will be difficult to respond to without specific measures. NW Natural would like to see low-cost and no-cost measures available for both natural gas and electric customers.
3. Theme 3, Community benefits—reliability and resilience, focuses on increasing resilience from power outages with a metric covering the install of solar and storage systems only. NW Natural is supportive of making Theme 3 and its metric more comprehensive to promote some EE measures such as high efficiency heating equipment that help improve the affordability and lower gas heating bills in winter for the environmental justice communities.

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

eFiling
NW Natural
Rates & Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204
Phone: (503) 610-7330
Telecopier: (503) 220-2579
eFiling@nwnatural.com

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If you have any questions, please contact me at (503) 610-7326.

Sincerely,

/s/ Rebecca Trujillo

Rebecca Trujillo
Regulatory Consultant
NW Natural
250 SW Taylor Street
Portland, OR 97204
(503) 610-7326
rebecca.trujillo@nwnatural.com