

**PUBLIC UTILITY COMMISSION OF OREGON  
INTEROFFICE CORRESPONDENCE**

**DATE:** December 20, 2021

**TO:** Caroline Moore

**FROM:** Madison Bolton

**SUBJECT:** **NW Natural:** 2022 Tariff has been updated under the OPUC Order No. 21-414 without formal advice filing

**Background:**

Docket No. UM 779 typically requires utilities to submit a compliance filing with updated tariff sheets to reflect rate revisions for late payment charges and interest on customer deposits each year. However, the rates set by Order No. 21-414 for 2022 do not reflect any changes from those in the previous year's Order No. 20-437. Provided utilities do not include past dates requiring revision or language contrary to the rules in Order No. 21-414, the tariff sheets are already compliant, and the utility does not need to submit a formal compliance filing.

For 2022 rates, NW Natural meets the criteria for an exemption of a formal compliance filing. In Staff correspondence with NW Natural, Regulatory Consultant Rebecca Brown confirmed that the utility would not need to submit a formal compliance filing due to the late payment charge and interest on customer deposits reflecting no change from the prior year.

Since the rates will remain the same for 2022, Staff reviewed the previous year's advice filing for the following requirements for compliance with Commission Order No. 21-414:

- The late payment fee of 2.0% of unpaid balance, effective for service on and after January 1, 2022.
- The interest rate of 0.1% on customer deposits held during January 1 through December 31, 2022

**Staff's recommendations:**

Staff concludes that OPUC's Order 21-414 has been reasonably followed by NW Natural. The 2022 Tariff has been updated without formal advice filing.

Cc: Diane Davis