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NW Natural, Oregon Low-Income Energy Efficiency Annual Report, OLIEE,

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250 SW Taylor Street Portland, OR 97204 503-226-4211 nwnatural.com

December 28, 2023

### VIA ELECTRONIC FILING

Public Utility Commission of Oregon 201 High Street SE, Suite 100 PO Box 1088 Salem, Oregon 97308-1088

### RE: RG 13—Oregon Low-Income Energy Efficiency Program (OLIEE) Annual Report (2022-2023 Program Year)

Northwest Natural Gas Company, dba NW Natural (NW Natural or the Company), hereby submits its Oregon Low-Income Energy Efficiency Program (OLIEE) Annual Report for the 2022-2023 Program Year in accordance with the Company's Tariff P.U.C. Or. 25, Schedule 320.

Please address correspondence on this matter to me at (503) 610-7326 with copies to the following:

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

Sincerely,

/s/ Rebecca Trujillo

Rebecca Trujillo Regulatory Compliance

Enclosure

Oregon Low Income Energy Efficiency Program Annual Report to the Public Utility Commission of Oregon Program Year: October 2022 - September 2023

#### I. Summary

The programs supported by the Oregon Low Income Energy Efficiency Program (OLIEE) tariff continued to show successful recovery from challenges associated with pandemic restrictions and staffing of partner agencies experienced over the past couple of years. Our Community Action Program (CAP) agencies weatherized 175 dwellings and engaged several hundred additional NW Natural customers through energy education workshops, energy saver kits and tried out new ways of doing outreach such as posting billboards in their service area. The Open Solicitation Program (OSP) program saw an increase in projects that helped support around 650 residents in the program year.

#### II. OLIEE Overview

Since October 2002, NW Natural has collected public purpose funding for its Oregon Low-Income Energy Efficiency program (OLIEE). That rate started at one quarter of one percent (0.25%). During the 2017-18 program year the collection increased to one fifty-fifth of one percent (0.55%) total energy use billed from Oregon's residential and commercial customers. Due to a recognized need, and increase in project potential, project costs, and measures, collection was adjusted again in the 2019-20 program year and to equal to one eighty-fifth of one percent (0.85%) starting on January 1, 2020. This increase in funding came just as shutdowns were occurring across the state due to COVID-19. Due to restrictions and limitations associated with home services, staffing at CAP agencies, and other partners, the increased funding was not able to be distributed at the speed initially intended or planned. This has resulted in an increased carryover balance for the last four program years. The program saw a small increase in project completions last year and in collaboration with community action agencies, community-based organizations, and partners in our service area, NW Natural has proposed changes to the tariff that not only help reach more customers but also help accelerate the spending of the current balance. The proposed changes, which are being discussed with the OLIEE Advisory Committee but have not yet been filed with the Public Utility Commission of Oregon (OPUC), are discussed later in this report. Headwinds associated with supply chain constraints may continue to impact program delivery as well as workforce constraints, but program staff are making best efforts to navigate these challenges.

The OLIEE program assists NW Natural's low-income customers by reducing their natural gas use through the installation of high-efficient gas equipment and weatherization. The program also empowers customers to reduce consumption through energy literacy in conjunction with weatherization as well as stand-alone services. The program is applicable to dwellings occupied by customers who meet income guidelines as established in Oregon's annual Low-Income Home Energy Assistance Program (LIHEAP) State Plan.<sup>1</sup>

#### III. OLIEE Community Action Program

OLIEE partners with community action agencies in each county to administer the OLIEE program. These agencies utilize matching funds derived from various funding sources such as, the Community Services Office, LIHEAP and the US Department of Energy's Weatherization Assistance Program. NW Natural contributes to each eligible gas home's weatherization and energy efficiency efforts as follows:

<sup>&</sup>lt;sup>1</sup> https://www.oregon.gov/ohcs/pages/low-income-energy-assistance-oregon.aspx

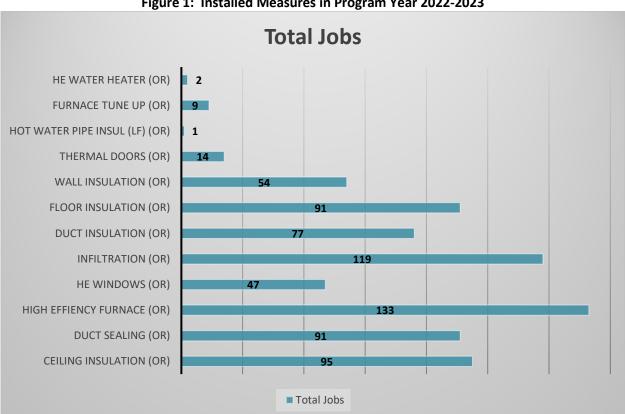
**Oregon Low Income Energy Efficiency Program** Annual Report to the Public Utility Commission of Oregon Program Year: October 2022 - September 2023

#### Per Project Reimbursement Caps

Expense category	Сар
Max per dwelling	\$21,600
Weatherization Only	10,000
Heating Equipment Only	5,000
Administration per dwelling	1,600
Health, Safety and Repairs per dwelling	1,000
Flexible Spending (EE Measures, H/S/R, Admin	4,000
Reimbursement per dwelling	21,600

#### IV. **Current year weatherization results**

In 2022-2023 the funds supported over 733 measures installed.





Oregon Low Income Energy Efficiency Program Annual Report to the Public Utility Commission of Oregon Program Year: October 2022 - September 2023

#### Table 1 – Prior Three Program Years' CAP Results

(Due to staffing changes target numbers for heat year 2021-2022 are not available)

	2022-2023	2021-2022	2020-2021	2019-2020
Weatherized Dwellings (Target)	276	N/A	545	306
Dwellings weatherized (Actual)	175	165	341	248
Reimbursed Measure Costs	\$1,327,231	\$1,312,939	\$1,561,476	\$1,595,651
Reimbursed HSR	\$217,689	\$127,790	\$156,805	\$185,938
Est. therms	56,179	58,037	60,394	68,320
Est. therms saved per dwelling <sup>2</sup>	312	284	316	277

**Program Completions:** The table below provides project completion counts at partner community action agencies. The table includes targets collected at the beginning of the program year. During this heat season, we saw some of our partner agencies slowly recover from the effects of the pandemic. We continued to see staffing shortages and contractor shortages that have impacted the ability to produce more jobs in specific regions. Rising inflation and costs have also impacted the amount of work being done in homes. Although the increase in allowed per-dwelling funding that went into effect in November 2022 has helped not only cover more health and safety measures as well as administrative expenses, but we are also seeing and monitoring the increase in per project cost. Products and materials essential to weatherization projects are not as readily available. Despite challenges, the program continues to focus on serving more dwellings, including multifamily dwellings, where possible.

<sup>&</sup>lt;sup>2</sup> Estimated therms saved as calculated by the Oregon Department of Energy (ODOE) -approved modeling software, RemRate, Energy Trust of Oregon and/or Regional Technical Forum.

Oregon Low Income Energy Efficiency Program Annual Report to the Public Utility Commission of Oregon Program Year: October 2022 - September 2023

#### Table 2: CAP Project Completions 2022-2023

CAP Agency	Counties Served	Completions	Projections
Clackamas County CA	Clackamas	1	0
Community Action Organization	Washington	70	70
Community Action Team, Inc.	Columbia and Clatsop	0	8
Community Services Consortium	Benton, Linn and Lincoln	20	40
Homes for Good	Lane	2	20
Mid-Columbia Community Action Council	Hood River and Wasco	0	0
Mid-Willamette Valley CA	Polk and Marion	11	45
Multnomah County Weatherization & Energy Services	Multnomah	66	85
Yamhill Co CA Partnership	Yamhill	5	8
Oregon Coast Comm Action	Coos	0	0
All Agencies		175	276

These results were discussed with the agencies and the OLIEE Advisory Committee. Several of the largest agencies continued to see significant impacts to operations that resulted in the sustained drop in production. The most significant impact on the project completions has been lack of workforce. We have also heard from partner agencies that they are operating at 50% capacity at times and are unable to retain the necessary workforce to meet their yearly goals.

#### V. Customer Counts

In addition to 2022-2023 completions, Table 3 provides customer counts by Agency service territory.

#### Oregon Low Income Energy Efficiency Program Annual Report to the Public Utility Commission of Oregon Program Year: October 2022 - September 2023

CAP Agency	Residential Meter Count	% of customers	2022-23 % of completions
Clackamas County CA	92,433	14.3%	0.6%
Community Action Organization	141,204	21.8%	40%
Community Action Team, Inc.	21,018	3.3%	0%
Community Services Consortium	52,724	8.25%	11.4%
Homes for Good Housing Agency of Lane Co	39,709	6.1%	1.1%
Mid-Columbia Community Action Council	5,434	0.8%	0%
Mid-Willamette Valley CA	81,288	12.6%	6.3%
Multnomah County Weatherization & Energy Services	197,971	30.6%	37.7%
Yamhill Co CA Partnership	12,694	2.0%	2.9%
Oregon Coast Comm Action	1,810	0.3%	0%
All Agencies	646,285		

#### VI. Program Funding<sup>3</sup>

Average reimbursement cost per dwelling was \$8,785 (inclusive of administrative, audit and inspection costs). Additionally, fewer whole-home retrofits were completed due to workforce shortages, and there was an increase in the number of equipment-only projects in response to the conditions of the past few years. There has been an increase in program funding due to increased allowed funding per dwelling that went into effect in November 2022 as well as increased interest rates. NW Natural is exploring strategies to help reach more customers. In collaboration with community action agencies, community-based organizations, and external stakeholders, NW Natural hopes to:

- Complete a third-party impact evaluation of OLIEE program.
- Cover initial expenses for special projects related to the CAP program; this could mean additional outreach, education, equipment needed to produce more projects.
- Increase income eligibility of the program to provide agencies the opportunity to work with customer in the 80% AMI income bracket. Not all agencies will be able to make this change due

<sup>&</sup>lt;sup>3</sup> Projects are typically paid within a month after being submitted and every attempt is made to be paid in the program year they are counted. This section reflects actual expenditures.

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to federal funding requirements but there are agencies that are currently working with funds that allow for higher income eligibility and it would allow NW Natural funds to be blended with these already available funds.

• Increase flexibility of how programs are approved. Rather than requiring an SIR of 1.0 or higher only, allowing for DOE priority lists and Deemed Measures lists to qualify for the program.

Once these changes are filed with and approved by the OPUC, there will be an implementation period and an assessment to determine if these initiatives are providing the desired results.

Funding for the program is based on a program year of October 1 – September 30, which is the same time period during which project completions are counted. Funding is billed and recorded (below) but not collected or deposited until the start of the following month. Interest is also paid the month following when it was earned.

Project completions are by date of agency completion, not by date of receipt or processing by NW Natural. Expenses are tracked on a cash basis. The one-month offset in the chart below is a result of these factors.

Program Revenue (10/22-9/23):			
Public Purpose Funding	\$ 9,014,633.19		
Interest and Investment Income	\$ 6,446,593.68		
Total PY 2022-23 Program		\$ 15,461,226.87	
Revenue			

#### Table 4 – 2022-2023 OLIEE Program Year Funding (12 months revenue)

Expenses (10/22-9/23):			Actual	Сар
Total Agency Cost <sup>4</sup>	\$ (2,052,092.00)			
Open Solicitation Program (OSP)	\$ (1,140,460.00)			
NW Natural Administration	\$ (161,137.00)		2.2%	5%
Energy Education	\$ (524,360.00)		7.2%	10%
Total PY 2022-23 Expense		\$ (3,878,048.00)		
PY 2022-23 Carryover		\$ 11,583,178.87		

#### VII. Energy Education

The current tariff allows 10% of program collections to be used for client energy education each program year, while the actual program year 2022-2023 disbursement was 7.2%. NW Natural participated in the promotion of the weatherization program in specific regions of the service territory by attending outreach events outside of the Portland Metro area and creating bill inserts for organization that needed help with outreach and program signups. This program year we started seeing our partner agencies back in the community with outreach events and in-home energy education

<sup>&</sup>lt;sup>4</sup> Agency costs include measure reimbursement, health, safety and repair allowance as well as administrative costs.

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services. Our partner agencies have adapted from COVID-19 to being able to deliver energy education services through different channels and creating more accessibility.

The Company's goal is to continue to create awareness of the program by creating different touch points in which NW Natural customers will engage with weatherization and energy efficiency resources. NW Natural specifically hopes to:

- Continue to support agencies that need additional outreach assistance through bill inserts.
- Continue to distribute weatherization information through a postcard created with help from community action agencies.
- Distribute Do-It-Yourself weatherization kits at outreach events and through communitybased organizations to disseminate weatherization resources information, energy saving tips, additional ways to save on your bill, and safety tips.

Create a post-weatherization engagement survey to get feedback from customer while providing important reminders and education around energy efficiency in the home. Based on Agency and OLIEE Advisory Committee feedback, NW Natural will also continue to support the utilization of energy education to find ways to support outreach efforts, streamline enrollment, and enhance waitlist management. A few NW Natural and agency-specific examples are included in Appendix 1. NW Natural is pleased with the agency efforts and seeks to foster inter-agency collaboration to help create an even stronger education program.

#### VIII. OLIEE: Open Solicitation Program (OSP) Overview

As outlined in Schedule 320, the primary goal of the OSP is to provide cost-effective, energy efficiency assistance to a greater number of low-income households in NW Natural's Oregon service territory utilizing a broad and diverse network of delivery channels. OSP is funded through the OLIEE program and amplifies opportunities for certain types of dwellings, tenant profiles, investments and projects that fall outside of the conventional OLIEE program (the reimbursement-based offering that is administered in partnership with CAP agencies). It serves as a funding vehicle or tool to unlock, expedite, streamline, etc. the delivery of energy efficiency projects that help low-income customers reduce energy usage, save money and live in healthier homes. The OSP was introduced to Schedule 320 in 2013 as a supplemental, complementary resource to increase and accelerate the delivery of weatherization services to low-income households while adhering to the spirit of the OLIEE program.

Demonstrating that the benefits of energy efficiency efforts will accrue to low-income residents is a requirement for OSP funds. OSP focuses on these interventions where impact exists at the household level—reserving ratepayer public purpose surcharge dollars to projects that benefit customers in the form of bill reductions, emission reductions, interior air quality improvements, etc. Reducing gas bills for low-income customers is a key goal of the program; thus, targeting OSP dollars in projects/buildings in which customers are responsible for their own bills helps to achieve this most directly. Buildings in which the tenants do not pay directly for their own utilities (e.g., but rather through rent, utility assistance, vouchers) are eligible for OSP funds. The critical factor with any potential partnership is a clear and compelling demonstration that the allocation of program funding will result in more energy efficiency projects for a greater number of income-eligible customers.

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OSP is a competitive grants program. By invitation only, NW Natural will consider proposals for new affordable housing developments, existing retrofit opportunities, and owner-occupied and rental dwellings; and will encourage proposals that include a component for energy education, environmentally sustainable practices and collaboration with other entities or programs.

In 2021, NW Natural embarked on a year-long process to restore delivery of the OSP. While NW Natural had previously funded OSP projects, the program had been inactive for a few years to allow the program processes and controls to be refined. Following a comprehensive update, the program is active and continues to enable the delivery of energy savings for low-income customers that have not historically been well served by the conventional CAP offerings.

OSP project spending for 2023 was just over \$1.7 million and reached approximately 700 low-income residents in Eugene, Hood River and Portland.

Oregon Energy Fund (OEF) continues to be a strong OSP partner. In 2023, OEF completed a multi-year, multi-investment project that provided energy retrofits for five buildings that house, shelter and care for approximately 320 low-income children, youth and adults with intellectual and developmental disabilities each year. The partnership model brought together three leading institutions: OEF (as lead), Albertina Kerr and the Oregon chapter of the National Association of Minority Contractors (NAMCO). OEF also launched a new retrofit initiative with Habitat for Humanity. OSP funds will provide full building energy retrofits for 14 owner-occupied, Habitat condominium units in the Agape Square community in Lents (Portland).

In Eugene, OSP funded energy efficiency upgrades and structural repairs to the Eugene Mission, a homeless shelter. The building serves unhoused individuals in the Eugene and Springfield area and provides temporary shelter, transitional housing and daily meals to roughly 250 people each year. These upgrades will address energy inefficiencies, lower energy costs and increase the overall health and quality of life for those who depend on the services provided by the Mission. The Project was active for over two years while the Homes for Good (HFG) Energy Services Division (ESD) completed necessary data collection, analysis and design activities while also adhering to all funding guidelines and requirements set forth by the Oregon Housing and Community Services (OHCS) Low-Income Weatherization Program. During this two-year period, HFG has paid for project expenses out of its own operating budget; OSP support retroactively covered these costs as well as delivered the necessary funding to complete the project. Without OSP funding, the project would remain unfinished.

OSP funding also targeted new technology this year. Through a pilot program with Homes for Good, 10-20 homes previously weatherized through the OLIEE program but did not receive a high-efficient gas furnace will receive installation of a ground source heat pump and ground loop technology. Funding will also cover ongoing performance monitoring and user experience evaluation to help determine cost effectiveness of such installations for potential incorporation into the standard OLIEE program. Homes for Good will work in partnership with Geonomic, a local ground source heat pump installer, whose mission is aligned with the aims of OLIEE and HFG, as it strives to make geothermal affordable in service to people and the planet to select the specific candidate pool. Geonomic will install units and HFG will perform on-going customer service for a year following installation to help make any adjustments as seasons and HVAC needs change. NW Natural will conduct qualitative measurement to

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provide product savings validation and perform customer interviews to understand the nuanced aspects of their experience with the technology. Collectively, this information should provide a firm foundation to determine future application within OLIEE.

In addition to testing new technologies, NW Natural is exploring new and innovative ways to optimize OSP funding. On the horizon is a pilot program in which OSP funding will position two culturally specific organizations to take on energy retrofit projects in homes with natural gas, develop energy education materials and train jobseekers for energy efficiency projects in gas-serviced homes. The pilot program demonstrates a new approach to utilizing OLIEE funds in that the projects will be funded by both arms of the OLIEE funding program: OSP for planning, outreach and community engagement costs, and the reimbursement-based single family home program for energy efficiency measures. These investments will fund energy efficiency measures, services, and education for50 income-eligible NW Natural customers over two years. OLIEE funding will play a catalytic role in bringing much-needed energy efficiency resources to low-income NW Natural customers who—but for this program---would remain unserved.

Another new initiative will address multiple bottlenecks in the residential weatherization and energy efficiency industry that stifle activity, create inefficiencies, and limit access to meaningful energy saving measures for low-income households. With OSP funding, Homes For Good and Lane Community College (LCC) will establish a one-year residential weatherization certificate program. Courses within the program currently exist at LCC; new to this program is that Homes for Good curated the certificate program based on the weatherization jobs it holds on its waitlist and is unable to fill.

Several factors have hindered Homes for Good's capacity to complete energy efficiency projects in gasserviced homes—support for this project will target OLIEE funding to unclog these congestion points and ultimately better position the organization to take on and complete projects for income-eligible NW Natural customers. This tailored approach ensures that students are equipped with the precise skills required for in-demand positions, enhancing their employability.

#### IX. Program Oversight

The OLIEE Advisory Committee meets semi-annually to provide deliberation and counsel to NW Natural. Members include agency representatives (six), the Citizens Utility Board, the OPUC and the Community Action Partnership of Oregon. The intent of this body is to provide feedback and recommendations for program changes and performance. In the PY 2022-2023, the OAC discussed program results, tariff changes and recommendations, and OSP projects.

#### X. Program Accountability

NW Natural solicited feedback from program partners through an anonymous 10 question survey. Results on the OLIEE program averaged 1.1 out of 1 to 5 scale where 1 was "extremely satisfied" and 5 was "not at all satisfied." Results are anonymous and respondents vary from year to year. All responses are optional: there were seven respondents in 2023, and seven respondents in 2022.

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OLIEE	2018-19	2019-20	2020-21	2021-22	2022-23
Professionalism	1.00	1.14	1.10	1.00	1.00
Timeliness	1.10	1.57	1.00	1.00	1.14
Courtesy	1.00	1.29	1.00	1.00	1.00
Helpfulness	1.00	1.14	1.00	1.00	1.00
Knowledgeable	1.00	1.14	1.20	1.00	1.14

#### Table 5 - Customer Service Survey Results for OLIEE Program Year 2022-2023

Agencies typically have fewer interactions with other departments at NW Natural, but a question was asked to allow feedback. Other NW Natural departments had overall results that averaged 12, an improvement from last year on a 1 (extremely satisfied) to 5 (not at all satisfied) scale. We are always looking for improvements, especially when it comes to payment processing and getting funding to our partners in a timely manner.

#### Table 6 - Customer Service Survey Results for Interactions within NW Natural 2022-2023

Other NW Natural Dept	2018-19	2019-20	2020-21	2021-22	2022-23
Accounting / Payment Processing	1.00	1.40	1.20	1.66	1.28
Call Center	1.25	1.50	1.30	1.00	2.00
Service Technicians	1.40	1.67	1.30	1.00	1.50
Utility Billing / Data Request	1.40	1.33	1.50	1.20	2.00
Philanthropy	0.00	0.00	0.00	1.00	1.50

Some recommendations/comments from the survey:

"We have a very positive relationship with NWNG staff. We would like to explore ideas for energy education, billboards."

"Helping with outreach, periodic inserts in billings to target populations."

"More standardized submission process and application forms."

"We are very happy about the flexibility of OLIEE funds added during the last cycle. Also, we are very grateful for the OSP program's help with our special project The Mission, Lane County's homeless shelter."

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#### **Appendix 1: Energy Education Details**

Outreach in high-volume areas such as Washington and Multnomah Counties continues to be an important element of the Energy Education funding. Those two agencies regularly maintain single digit waitlists.

The remaining counties had waitlists that vary largely based on the presence of customers. Energy Education continues to provide tips and kits to assist these customers until they can be served. Funding is also utilized to reach, enroll, and process these customers more quickly.

During the program year 2022-2023, we saw increased collaborations with our CAP agencies to do outreach via bill inserts, and postcards promoting the program at outreach events. Due to COVID, all agencies were providing in-home and/or virtual energy education to clients. A selection of materials is attached as reference.



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#### ELIGIBILITY

The following items <u>must</u> be provided to YCAP to qualify for Weatherization (additional documentation may be required):

- Approved eligibility application/packet.
- All necessary authorizations completed by the owner/ authorized agent and occupant.
- Property is clear from safety and health hazards.

The weatherization program follows 200% of established Federal Poverty Guidelines listed below. In a duplex or a quadraplex, 50% of the units must be occupied by income-eligible households in order for the entire building to qualify for weatherization. In other multi-dwelling applications, regulations require that 66% of the units meet the 200% of established Federal Poverty Guidelines. Based on the availability of funds, applicants are selected from a priority waiting list.

#### GROSS INCOME GUIDELINES

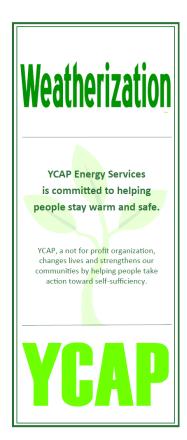
#	MONTH	ANNUAL
1	\$2,430.00	\$29,160.00
2	\$3,286.66	\$39,440.00
3	\$4,143.33	\$49,720.00
4	\$5,000.00	\$60,000.00
5	\$5,856.66	\$70,280.00
6	\$6,713.33	\$80,560.00
7	\$7,570.00	\$90,840.00
8	\$8,426.66	\$101,120.00
7	\$7,570.00	\$90,840.00 \$101,120.00



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