



## e-FILING REPORT COVER SHEET

COMPANY NAME:

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION? No Yes If yes, submit a redacted public version (or a cover letter) by email. Submit the confidential information as directed in OAR 860-001-0070 or the terms of an applicable protective order.

Select report type: RE (Electric) RG (Gas) RW (Water) RT (Telecommunications)  
RO (Other, for example, industry safety information)

Did you previously file a similar report? No Yes, report docket number:

Report is required by: OAR  
Statute  
Order

Note: A one-time submission required by an order is a compliance filing and not a report (file compliance in the applicable docket)

Other  
(For example, federal regulations, or requested by Staff)

Is this report associated with a specific docket/case? No Yes, docket number:

List Key Words for this report. We use these to improve search results.

Send the completed Cover Sheet and the Report in an email addressed to [PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

Send confidential information, voluminous reports, or energy utility Results of Operations Reports to PUC Filing Center, PO Box 1088, Salem, OR 97308-1088 or by delivery service to 201 High Street SE Suite 100, Salem, OR 97301.



250 SW Taylor Street  
Portland, OR 97204

503-226-4211  
nwnatural.com

December 2, 2021

***VIA ELECTRONIC FILING***

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

**RE: RG-10—Oregon Low-Income Gas Assistance Program (OLGA)  
Annual Report (2020-2021 Program Year)**

Northwest Natural Gas Company, dba NW Natural, hereby submits its Oregon Low-Income Gas Assistance Program (OLGA) Annual Report for the 2020-2021 Program Year in accordance with the Company's Tariff P.U.C. Or. 25, Schedule 310.

Please call me at (503) 610-7326 if you have any questions.

Sincerely,

*/s/ Rebecca T. Brown*

Rebecca T. Brown  
Regulatory Compliance

Enclosure

---

**NW NATURAL  
OREGON LOW-INCOME GAS ASSISTANCE (OLGA)  
ANNUAL REPORT  
2020-2021 PROGRAM YEAR**

# **NW Natural's Oregon Low-Income Gas Assistance (OLGA) October 2020 through September 2021 Program Year**

## **BACKGROUND**

NW Natural's Oregon Low-Income Gas Assistance (OLGA) program provides natural gas bill payment assistance to income-eligible households. The OLGA program is designed to supplement Federal Low-Income Home Energy Assistance Program (LIHEAP) funding.

## **HISTORY OF PROGRAM FUNDING**

NW Natural began collecting public purposes funding for low-income bill payment assistance in October 2002 in accordance with the Oregon Public Utility Commission (OPUC) Order No. 02-634 in Docket UG-143. Funds for low-income bill payment assistance were initially collected through a 25-cent surcharge on all Oregon residential customer bills.

Effective May 11, 2006, this charge was increased to 31 cents. On November 1, 2008, the collection was revised from 31 cents a bill to being a 0.33% charge applied to residential customers' total energy bill. At the same time this change was made, language was added to the tariff to allow the Company to redirect any portion of a separate 0.25% charge towards either the OLGA Program or the Oregon Low-Income Energy Efficiency (OLIEE) Program. The Company annually reviews OLGA and OLIEE funding. While the Company values weatherization as a longer term solution to high bill issues, the OLIEE Program does not always keep pace with its funding. If OLIEE has a surplus of funds, collections may be reallocated to the OLGA Program.

From October 2008 through October 2010, OLGA was funded by both the 0.25% charge and the 0.33% charge. Effective October 1, 2010, the 0.25% charge was redirected to funding OLIEE. At the same time, OLGA collections were raised by 0.25% resulting in no change to OLGA Program funding.

OLGA Program funding was increased once again in 2012 when the Company filed its rate case (UG-221). As a result of this proceeding, the residential charge funding the OLGA Program was increased from 0.58% to 0.75%. No changes have been made to the rate since 2012.

## **PROGRAM ADMINISTRATION**

Since the Program's inception in 2003, the Company has worked closely with OPUC staff, Oregon Housing and Community Services (OHCS), the Community Action Partnership of Oregon (CAPO) and the Community Action Agencies ("Agencies") who deliver the Program to customers. Representatives from each of the Agencies have jointly formed the OLGA Advisory Council. The Council meets regularly to ensure that application and program administration processes are streamlined and managed effectively and all concerns are addressed so that the shared goal of serving as many qualifying customers as possible is attained.

The OLGA Advisory Council has met quarterly since July of 2005. In 2009, physical meetings were largely replaced with teleconferences with at least one face-to-face meeting each Program Year. This Program Year, teleconference meetings were held November 10, 2020, July 1, 2021, and July 15, 2021. However, due to COVID-19, we were again unable to hold our planned annual face-to-face meeting at NW Natural's new headquarters. When COVID-19 restrictions are lifted, NW Natural will renew its practice of scheduling an annual face-to-face meeting with the Council.

During the 2020/2021 Program Year, the Company still managed to work very closely with the Agencies, OHCS and the OPUC to implement program administration changes in response to feedback from CAPO and the need to be responsive to the COVID-19 pandemic. In 2021, the Company continued to follow the process implemented in March of 2020 where the Company offered guidance to the Agencies in order to provide flexibility in the intake process. This allowed for remote work and accommodation of applications by phone as well as flexible documentation processes, such as verbal signatures. This guidance followed OHCS's Oregon Energy Assistance Program (OEAP) Temporary Eligibility Standards COVID-19 Emergency Declaration. Additionally, the Agencies have been able to implement the changes made in July of 2020 where the Company updated the OLGA tariff to allow them to qualify clients for OLGA grants using categorical eligibility. With categorical eligibility, customers are deemed automatically eligible for assistance from OLGA based on participation in select federal programs, such as SNAP (Supplemental Nutrition Assistance Program or "Food Stamps"), SSI (Supplemental Security Income), or TANF (Temporary Aid to Needy Families).

To explain and to clarify the OLGA program and NW Natural's policy and procedures for the Program, the memorandum below was sent by Darcy Noxon to the OLGA Advisory Council and OPUC Staff on July 19, 2021. This memorandum outlined a permanent change/addition to identification requirements for OLGA applicants as well as a pilot for additional forms of identification the Agencies can accept for a period of time. NW Natural will review the results of the pilot at a later date to determine if accepting those additional forms of identification from OLGA applicants appears to create or has created increased opportunities for energy assistance fraud or abuse. This will allow the Company to also consider if those additional forms of identification should/can be added permanently to the list of acceptable forms of identification for the OLGA Program.

## MEMORANDUM

July 19, 2021

To: OLGA Advisory Council and OPUC Staff

From: Darcy Noxon

### **Memorandum on Oregon Low-income Gas Assistance (OLGA) Program**

Several issues were examined and discussed in the Council's July 1 quarterly meeting and July 15 follow-up meeting related to identification requirements for OLGA applicants and applying the annual LIHEAP Benefit Matrix for each Program Year. The Council's goals are to minimize administrative burdens, to provide clarity on application of the LIHEAP Benefit Matrix within the context of the OLGA Program and to maximize Program accessibility for NW Natural ratepayers. Agency staff can use this memorandum as a point of reference until the OLGA Guidelines manual has been formally updated and an update to OLGA Schedule 310 has been completed, if it is determined to be necessary.

### **Identification Requirements for OLGA Applicants**

Effective immediately, NW Natural is implementing an update to the identification requirements for OLGA applicants. NW Natural has determined that once a party has met identification requirements to obtain gas service and establish themselves as a customer of record, it will not be required for Agency staff to obtain those same pieces of identification for OLGA eligibility unless the applicant chooses to provide them. However, **the applicant/customer of record must provide their utility bill and a valid form of photo identification as verification of identity.** Below are examples of documentation that can be provided to establish identity:

- Driver's License or State-issued Identification Card
- Military Identification Card
- Passport or Government-issued Identification Card
- School or Employer Identification Card

**A "customer of record" is any party whose name appears on the utility bill.** If the applicant/customer of record cannot produce their utility bill, a copy can be requested from NW Natural or the customer(s) of record can be verbally confirmed by the NW Natural Energy Assistance Team.

Through the 2021-2022 Program Year, NW Natural will also implement a pilot program to allow additional forms of identification for OLGA applications during a trial period. **OLGA applicants/customers of record may provide an example of documentation shown below to establish identity in lieu of a valid form of photo identification:**

- Birth Certificate
- Social Security Number or Records
- School Records
- Insurance Card or Insurance Records
- Tax Records
- DHS Printout or Paystub
- Court or Government Records

NW Natural will audit the Program no later than December 1, 2022, to determine if there is evidence of increased incidents of fraud or identity theft after allowing forms of identification that don't contain a

photo to verify identity. If the Program appears to be more vulnerable to fraud and identity theft at any point, these forms of identification may be removed from the Program, but the goal will be to make them permanent if their addition proves to be a positive change. NW Natural will make changes sooner or at a later date if it becomes necessary to guard the integrity of the Program.

OLGA is a ratepayer program, not a Federal program. Unlike LIHEAP, a Social Security Number (SSN) is not required to receive OLGA benefits. NW Natural doesn't require Social Security Numbers (SSNs) as a primary form of identification for gas service either. An applicant may go through the entire OLGA intake process without providing a SSN or any SSN-related records despite them being ID options. This is an important point regarding the use of the LIHEAP Benefit Matrix.

### **Use of LIHEAP Benefit Matrix in OLGA Applications**

SSN verification for the applicant or any other members of the household **is not required** to process OLGA applications or to receive OLGA benefits. However, the applicant must be a customer of record. Applicants who receive an OLGA grant along with LIHEAP benefits will likely default to providing a SSN as their form of identification for both programs and will be required to provide the SSNs of household members for the purpose of determining "household size" when seeking LIHEAP benefits. This should not be mistaken for an OLGA Program requirement.

Once the OLGA applicant/customer of record has met the OLGA identification requirements described above, the application process can proceed as usual with one exception. When applying the annual LIHEAP Benefit Matrix to calculation of OLGA benefits, **Agency staff may use the number of applicable household members without obtaining each household member's SSN to determine the total OLGA grant amount.** Identification is only required of the OLGA applicant/customer of record. All other members of the household can receive the benefit of an OLGA grant as they would for a full LIHEAP application. The LIHEAP Benefit Matrix is intended as a guide to determine OLGA benefits based on household size but, as a ratepayer program, deviates from LIHEAP's SSN requirement for each household member in order for them to be counted.

If the applicant/customer of record has met the identification requirements, all members of the household are eligible for an OLGA grant. For example, if there are ten (10) members of the household, all ten (10) individual members are eligible as long as the applicant/customer of record has met the OLGA identification requirements as outlined above in the Identification Requirements for OLGA Applicants section of this memorandum.

As a followup to the memo from Darcy Noxon, in the November 9, 2021 OLGA Advisory Council meeting, Agency members were asked for an update on the implementation of the new guidelines documented in Darcy Noxon's memo. Overall, the Agency members stated they were able to implement the changes with their staff members fairly well and were able to get answers to any remaining questions.

### **PROGRAM YEAR RESULTS**

Two tables are attached:

Table 1 provides the 2020-2021 Program Year actual revenues less actual expenditures by month, October 2020 through September 2021. The Agencies distributed \$2,243,670 in OLGA funds, which assisted 5,044 households in NW Natural's service territory. The Agencies were paid \$448,734 for Administration and Program Delivery of the OLGA funds to NW Natural's customers to assist them with their energy bills.

Table 2 shows Agency statistics for the 2020-2021 Program Year.

### **CONCLUSION**

The Agencies have done an excellent job in their delivery of the OLGA funds during the 2020-2021 Program Year despite the many challenges presented by the pandemic.



**NW NATURAL**

**Table 1 - October 2020 through September 2021  
Oregon Low-Income Gas Assistance Program (OLGA)**

Program-To-Date Summary		Revenues			Expenditures			Number of Customers Served
Roll-Over	Revenues	Interest	Total Revenues	Customer Payments	Agency Payments	Total Expenditures		
815,460.02	3,110,100.69	92.17	3,925,652.88	2,243,670.00	448,734.00	2,692,404.00	5,044	

2020-2021		Revenues			Expenditures			Actual Revenues less Actual Expenditures
Program Month	Beginning Account Balance	Monthly Program Revenues	Interest	Total Revenues Balance	Payments to Customers	Payments to Agencies [1]	Total Expenditures	
<b>2020</b>								
October	\$815,460.02	\$97,084.71	\$6.91	\$912,551.64	\$132,879.00	\$26,575.80	\$159,454.80	\$753,096.84
November	\$753,096.84	\$123,218.28	\$0.00	\$876,315.12	\$219,737.00	\$43,947.40	\$263,684.40	\$612,630.72
December	\$612,630.72	\$285,515.50	\$6.62	\$898,152.84	\$231,950.00	\$46,390.00	\$278,340.00	\$619,812.84
<b>2021</b>								
January	\$619,812.84	\$453,576.07	\$13.92	\$1,073,402.83	\$231,616.00	\$46,323.20	\$277,939.20	\$795,463.63
February	\$795,463.63	\$500,774.03	\$5.86	\$1,296,243.52	\$220,401.00	\$44,080.20	\$264,481.20	\$1,031,762.32
March	\$1,031,762.32	\$417,493.64	\$6.52	\$1,449,262.48	\$236,056.00	\$47,211.20	\$283,267.20	\$1,165,995.28
April	\$1,165,995.28	\$401,438.12	\$6.64	\$1,567,440.04	\$193,448.00	\$38,689.60	\$232,137.60	\$1,335,302.44
May	\$1,335,302.44	\$305,782.07	\$8.47	\$1,641,092.98	\$178,394.00	\$35,678.80	\$214,072.80	\$1,427,020.18
June	\$1,427,020.18	\$189,229.63	\$8.76	\$1,616,258.57	\$181,609.00	\$36,321.80	\$217,930.80	\$1,398,327.77
July	\$1,398,327.77	\$141,006.48	\$9.59	\$1,539,343.84	\$149,760.00	\$29,952.00	\$179,712.00	\$1,359,631.84
August	\$1,359,631.84	\$98,602.67	\$9.37	\$1,458,243.88	\$134,886.00	\$26,977.20	\$161,863.20	\$1,296,380.68
September	\$1,296,380.68	\$96,379.49	\$9.51	\$1,392,769.68	\$132,934.00	\$26,586.80	\$159,520.80	\$1,233,248.88
<b>2020-2021</b>		\$3,110,100.69	\$92.17		\$2,243,670.00	\$448,734.00	\$2,692,404.00	\$1,233,248.88

Deposits and Interest                      \$3,110,192.86

