



## 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@puc.oregon.gov](mailto:PUC.FilingCenter@puc.oregon.gov)

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 27, 2023

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
Attention: Filing Center  
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 (2022-2023 Program Year)**

Northwest Natural Gas Company, dba NW Natural, hereby submits its Oregon Low-Income Gas Assistance Program (OLGA) Annual Report for the 2022-2023 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 Trujillo*

Rebecca Trujillo  
Regulatory Compliance

Enclosures

---

**NW NATURAL  
OREGON LOW-INCOME GAS ASSISTANCE (OLGA)  
ANNUAL REPORT  
2022-2023 PROGRAM YEAR**

# **NW Natural's Oregon Low-Income Gas Assistance (OLGA) Program Year October 1, 2022 through September 30, 2023**

## **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 per bill to 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 toward either the OLGA program or the Oregon Low-Income Energy Efficiency (OLIEE) program. The Company reviews OLGA and OLIEE funding annually. 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 charge since 2012.

## **PROGRAM ADMINISTRATION**

Since OLGA's inception in 2003, the Company has worked closely with staff members from the OPUC, Oregon Housing and Community Services (OHCS), 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 8, 2022, February 28, 2023, May 10, 2023, and August 22, 2023. However, due to lingering concerns about COVID-19 and illness, we were again unable to hold our planned annual face-to-face meeting at NW Natural's new headquarters. NW Natural hopes to renew its practice of scheduling an annual face-to-face meeting with the Council in 2024.

During the 2022/2023 Program Year, the Company continued 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 2022 and 2023, the Company continued to follow the flexible process implemented in March of 2020 and offered guidance to the Agencies during 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 Temporary Eligibility Standards COVID-19 Emergency Declaration under the Oregon Energy Assistance Program (OEAP). Additionally, the Agencies have continued 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, i.e., the federal food stamp program), SSI (Supplemental Security Income), or TANF (Temporary Aid to Needy Families).

Through the 2021-2022 Program Year, NW Natural implemented 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

Darcy Noxon's memorandum, dated July 19, 2021, stated: "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." As of December 5, 2023, the referenced audit is delayed and pending due to regulatory priorities related to low-income programs and COVID-19 updates. Therefore, NW Natural hasn't made a final decision to move this process from a pilot program to a permanent program. The audit of our pilot program is now expected to be completed by June 30, 2024.

During the 2021-2022 Program Year, NW Natural had a preliminary discussion about exploring the potential for expanding the OLGA Program in Multnomah County to add four additional Community Action Agencies at CAPO's request. On August 31, 2022, Darcy Noxon, OLGA Advisory Council Committee Chair, Benedikt Springer, Community Action Partnership of Oregon (CAPO), and two additional OLGA Advisory Council Committee members met with the Executive Directors of Latino Network, Immigrant and Refugee Community Organization (IRCO), and Native American Youth and Family Center (NAYA) to discuss their interest in delivering NW Natural's OLGA program in Multnomah County. El Programa Hispano Catolico (EPHC) was invited to this meeting, but the Executive Director was unavailable. These four agencies indicated they might be interested in delivery of the OLGA program. All the agencies, EPHC in particular, indicated the potential for staffing challenges to support the program

though. NW Natural would be required to expand our internal accounting system to accommodate additional agencies and new OLGA partners. That task has been delayed due to regulatory priorities related to low-income programs and high winter call volumes during the recent heating season. Customers in this geographical area are currently being served well by several agencies and the potential partner agencies didn't request the program expansion and haven't since the preliminary meeting. NW Natural will reach out to them to discuss next steps for potential OLGA program expansion as regulatory priorities for low-income programs allow.

In July 2022, NW Natural's Residential Bill Discount Program was approved by the OPUC. Customers who received energy assistance or have participated in any of the Company's low-income programs are eligible to be automatically enrolled in this program at the default bill discount percentage of 15%. In the August 9, 2022, OLGA Advisory Council meeting, NW Natural presented a proposal for the Community Action Agencies to provide NW Natural with energy assistance recipient's income and household size on routine OLGA Payment Detail Reports used to report recipients' OLGA grants. This income and household size information allows energy assistance recipients to receive not only auto-enrollment for the NW Natural Residential Bill Discount Program, but potentially a bill discount percentage which may be higher than the default auto-enroll percentage. The Community Action Organization (CAO) of Washington County assisted NW Natural in the development and piloting of this new process and was the first to implement it and share their experience with the Council. Most of the Agencies who were able to incorporate this proposed process into their normal work stream were willing to provide NW Natural with the OLGA recipient's income and household size so that their clients/our customers will receive the highest possible bill discount percentage available to them without having to take any action. Those agencies participating in this process have done an excellent job and are provided feedback on their work in the OLGA Advisory Council meetings. The agencies are also provided updates on the Residential Bill Discount Program in the OLGA Advisory Council meetings.

## **PROGRAM YEAR RESULTS**

Two tables are attached:

Table 1 provides the 2022-2023 Program Year actual revenues minus actual expenditures by month from October 2022 through September 2023. The Agencies distributed \$3,688,238 in OLGA funds in the 2022-2023 Program Year compared to \$2,628,328 in the 2021-2022 Program Year (40% increase), which assisted 7,553 households in NW Natural's service territory compared to 6,086 in the 2021-2022 Program Year (24% increase). The Agencies were paid \$737,647.60 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 2022-2023 Program Year.

## **CONCLUSION**

The Agencies have done an excellent job in their delivery of the OLGA funds during the 2022-2023 Program Year.

## NW NATURAL

**Table 1 - October 2022 through September 2023  
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		
1,606,284.56	4,416,706.48	95,126.75	6,118,117.79	3,688,238.00	737,647.60	4,425,885.60	7,553	

2022-2023		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>2022</b>								
October	\$1,606,284.56	\$107,503.57	\$3,707.00	\$1,717,495.13	\$81,789.00	\$16,357.80	\$98,146.80	\$1,619,348.33
November	\$1,619,348.33	\$126,124.12	\$3,993.15	\$1,749,465.60	\$332,608.00	\$66,521.60	\$399,129.60	\$1,350,336.00
December	\$1,350,336.00	\$367,916.28	\$4,996.34	\$1,723,248.62	\$299,977.00	\$59,995.40	\$359,972.40	\$1,363,276.22
<b>2023</b>								
January	\$1,363,276.22	\$668,364.34	\$5,675.70	\$2,037,316.26	\$378,922.00	\$75,784.40	\$454,706.40	\$1,582,609.86
February	\$1,582,609.86	\$684,432.60	\$6,402.56	\$2,273,445.02	\$356,122.00	\$71,224.40	\$427,346.40	\$1,846,098.62
March	\$1,846,098.62	\$620,994.90	\$7,436.13	\$2,474,529.65	\$447,978.00	\$89,595.60	\$537,573.60	\$1,936,956.05
April	\$1,936,956.05	\$590,152.65	\$7,871.65	\$2,534,980.35	\$363,229.00	\$72,645.80	\$435,874.80	\$2,099,105.55
May	\$2,099,105.55	\$514,446.45	\$9,504.74	\$2,623,056.74	\$361,299.00	\$72,259.80	\$433,558.80	\$2,189,497.94
June	\$2,189,497.94	\$294,944.62	\$10,498.06	\$2,494,940.62	\$297,114.00	\$59,422.80	\$356,536.80	\$2,138,403.82
July	\$2,138,403.82	\$171,809.76	\$11,800.72	\$2,322,014.30	\$266,799.00	\$53,359.80	\$320,158.80	\$2,001,855.50
August	\$2,001,855.50	\$141,675.42	\$11,664.95	\$2,155,195.87	\$269,905.00	\$53,981.00	\$323,886.00	\$1,831,309.87
September	\$1,831,309.87	\$128,341.77	\$11,575.75	\$1,971,227.39	\$232,496.00	\$46,499.20	\$278,995.20	\$1,692,232.19
<b>2022-2023</b>		\$4,416,706.48	\$95,126.75		\$3,688,238.00	\$737,647.60	\$4,425,885.60	\$1,692,232.19

Deposits and Interest \$4,511,833.23

Oregon Low-Income Gas Assistance Program (OLGA)

Agency Statistics

Program Year 2022 - 2023

TABLE 2  
AGENCY STATISTICS

<b>YTD PROGRAM TOTALS</b>	
# of Households Served	7,553
Average Payment Per Household	\$488.31

	Post: Nov For: Oct	Post: Dec For: Nov	Post: Jan For: Dec	Post: Feb For: Jan	Post: Mar For: Feb	Post: Apr For: Mar	Post: May For: Apr	Post: Jun For: May	Post Jul For: Jun	Post: Aug For: Jul	Post: Sep For: Aug	Post: Oct For: Sep	YTD	% of Total Customers	% of Total Dollars	% of Mult. Co \$	
<b>Community Action Organization</b>																	
CAO																	
# of Households Served	29	129	138	144	142	173	138	73	108	118	122	121	1,435	19.00%	19.81%		
Average Payment per household	\$548	\$466	\$448	\$494	\$501	\$564	\$518	\$555	\$530	\$527	\$517	\$485	\$509				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>Community Action Team</b>																	
CAT																	
# of Households Served	0	0	35	44	38	73	53	40	37	11	12	18	361	4.78%	4.26%		
Average Payment per household	\$0	\$0	\$339	\$414	\$415	\$432	\$440	\$468	\$464	\$566	\$528	\$449	\$436				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>Clackamas County Social Services</b>																	
CCSSD																	
# of Households Served	49	117	100	133	80	100	53	43	37	38	61	59	870	11.52%	10.41%		
Average Payment per household	\$376	\$381	\$439	\$467	\$473	\$440	\$429	\$505	\$474	\$454	\$444	\$457	\$442				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>Community Service Consortium</b>																	
CSC																	
# of Households Served	16	245	142	133	106	96	76	88	56	51	43	42	1,094	14.48%	13.76%		
Average Payment per household	\$426	\$397	\$435	\$474	\$465	\$491	\$516	\$550	\$564	\$495	\$446	\$443	\$464				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>Health &amp; Human Services</b>																	
H&HS																	
# of Households Served	1	33	54	83	34	63	37	42	19	14	25	22	427	5.65%	4.96%		
Average Payment per household	\$305	\$406	\$418	\$409	\$425	\$435	\$425	\$449	\$441	\$455	\$450	\$470	\$429				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>Our Just Future (formerly Human Solutions)</b>																	
OJF																	
# of Households Served	4	18	18	21	27	41	44	19	19	15	12	8	246	3.26%	3.91%	16.85%	
Average Payment per household	\$536	\$537	\$488	\$691	\$545	\$634	\$579	\$703	\$513	\$531	\$639	\$528	\$586				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>Impact NW</b>																	
IMPCT																	
# of Households Served	10	47	24	55	88	106	101	99	71	61	68	30	760	10.06%	11.21%	48.29%	
Average Payment per household	\$445	\$488	\$427	\$453	\$497	\$524	\$519	\$585	\$613	\$649	\$602	\$581	\$544				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>Mid-Columbia Community Action</b>																	
MCCAC																	
# of Households Served	15	17	12	7	10	11	3	4	2	3	5	0	89	1.18%	1.11%		
Average Payment per household	\$446	\$467	\$434	\$415	\$515	\$440	\$475	\$441	\$650	\$465	\$496	\$0	\$462				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>Mid-Willamette Valley Community Action Agency</b>																	
MWVCA																	
# of Households Served	40	102	104	124	129	150	172	210	150	149	149	132	1,611	21.33%	20.76%		
Average Payment per household	\$386	\$441	\$462	\$459	\$479	\$484	\$468	\$468	\$486	\$495	\$469	\$534	\$475				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>Oregon Coast Community Action Agency</b>																	
ORCCA																	
# of Households Served	0	0	0	1	0	0	0	0	0	0	0	1	2	0.03%	0.02%		
Average Payment per household	\$0	\$0	\$0	\$470	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$390	\$430				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>SEI Community Services</b>																	
SEI																	
# of Households Served	25	45	47	42	65	55	44	55	55	40	31	16	520	6.88%	8.10%	34.86%	
Average Payment per household	\$465	\$508	\$467	\$517	\$561	\$661	\$578	\$596	\$637	\$615	\$601	\$692	\$574				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
<b>Yamhill Community Action Partnership</b>																	
YCAP																	
# of Households Served	0	22	12	23	11	12	12	16	6	5	8	11	138	1.83%	1.67%		
Average Payment per household	\$0	\$400	\$325	\$396	\$521	\$421	\$449	\$556	\$448	\$431	\$434	\$577	\$446				
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%				
0																	
# of Households Served	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%		
Average Payment per household	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0				
% funds disbursed to Administration													0%				
0																	
# of Households Served	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%		
Average Payment per household	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0				
% funds disbursed to Administration													0%				