



## 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.



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**VIA ELECTRONIC FILING**

April 30, 2020

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

**Re: RG 31—2019 Annual Report of Promotional Activities and Concessions**

Enclosed please find Northwest Natural Gas Company's, dba NW Natural (NW Natural or Company), 2019 Promotional Activities and Concessions Report, filed in compliance with OAR 860-026-0035. **The information in the enclosed report includes commercially sensitive information considered to be a trade secret and is provided as confidential under OAR 860-001-0070.**

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

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

Sincerely,

*/s/ Rebecca T. Brown*

Rebecca T. Brown  
Regulatory Consultant

Attachment



Annual Report of Promotional Activities and Concessions  
2019 Actual Expenditures

Program

1. General Merchandise Sales Program. Reference: Sheet 200-2

Expenditures:



Benefits:

Activities under this program are run through the Company's non-utility Appliance Center and are specifically designed to increase the sale of gas appliances within the Company's service territory. The greater saturation of gas appliance usage per customer achieved through gas appliance sales benefits the system by increasing load factor and reducing the Company's cost of providing service.

2. Equipment Sales Promotions. Reference: Sheet 200-3

Expenditures:



Benefits:

This program is designed to increase overall consumer interest in using natural gas equipment. Building and maintaining dealer interest in marketing gas equipment benefits the system because it serves to increase the saturation of gas appliance usage within the Company's service territory.

3. Cooperative Advertising Program. Reference: Sheet 200-4

Expenditures:



Benefits:

Cooperative advertising serves to double the potential sales impact of every dollar spent to advertise in the space and water heating markets. Benefits of cooperative advertising to the system are the resulting minimization of potential customer losses to competing fuels, and the achievement of a healthy and diverse market of wholesale and retail gas appliance dealers, all of whom provide valuable sales and maintenance services to gas customers and the public generally.

4. Showcase Developments. Reference: Sheet 200-5

Expenditures:



Benefits:

The Company's participation in new home developments serves to educate the building trades and the general public concerning the use of high efficiency natural gas equipment in the new home construction market. The system benefits from such participation because potential customer losses to competing fuels are minimized and greater saturation of natural gas appliances is achieved, both of which result in a lower cost to the Company of providing service.

5. Natural Gas Vehicle Program. Reference: Sheet 200-6

Expenditures:



Benefits:

This program is designed to encourage the purchase and use of natural gas in motor vehicles. Natural gas use in motor vehicles within the Company's service territory benefits the system by increasing natural gas usage, which reduces the company's cost of gas to all ratepayers.



6. Equipment Financing Program. Reference: Sheet 200-7

Expenditures:



Benefits:

Activities under this program are specifically designed to increase the sale of gas appliances within the Company's service territory. The greater saturation of gas appliance usage per customer achieved through gas appliance sales benefits the system by increasing load factor and reducing the Company's cost of providing service.



7. Company offered Products and Services. Reference: Sheet 200-8

Expenditures:



Benefits:

Activities under this program are specifically designed to increase enrollment in programs such as Paperless Billing, Equal Pay and Auto Pay.