

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: July 28, 2020**

REGULAR CONSENT EFFECTIVE DATE July 29, 2020

DATE: July 14, 2020

TO: Public Utility Commission

FROM: Kathy Zarate

THROUGH: Bryan Conway, Michael Dougherty, John Crider, and Matthew Muldoon **SIGNED**

SUBJECT: NORTHWEST NATURAL:
(Docket No. ADV 1141/Advice No. 20-06)
Application to modify language in Schedule 310.

STAFF RECOMMENDATION:

Approve Northwest Natural's (NW Natural or Company) Advice No. 20-06, effective with service on and after July 29, 2020, with less than statutory notice.

DISCUSSION:

Issue

Whether the Public Utility Commission of Oregon (Commission) should allow NW Natural to modify language in Schedule 310 to incorporate modifications that could mitigate the economic impact of the COVID-19 pandemic for NW Natural's customers.

Applicable Law

The Commission may approve tariff changes if they are deemed to be fair, just, and reasonable per ORS 757.210. Tariff revisions or corrections may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0005 and OAR 860-022-0025. OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules include in its filing a statement plainly indicating the increase, decrease, or other change made with the filing, the number of customers affected by the proposed

change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change.

Filings that make any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the change. ORS 757.220; OAR 860-022-0015.

Filings made with rates effective with service provided less than 30 days' notice require a waiver of statutory notice requirement.

Analysis

NW Natural filed Advice No. 020-06 on June 30, 2020, and seeks Schedule 310 changes with service on and after July 29, 2020. This request is with notice less than 30 days, so NW Natural also filed a LSN request.

The purpose of the filing is to make modifications to the language in Schedule 310, Oregon Low-Income Gas Assistance (OLGA), to enable the use of categorical eligibility guidelines by community action agencies (agencies) when screening and approving for eligibility for OLGA energy assistance.

NW Natural has heard from the agencies through the Community Action Partnership of Oregon (CAPO) that one barrier to expanding the reach of energy assistance is eligibility qualifications. The proposed revisions to the NW Natural OLGA tariff change the documentation requirements to allow for the use of categorical eligibility. Broad-based categorical eligibility is a policy in which households may become categorically eligible for energy assistance because they qualify for such programs as non-cash Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), or Supplemental Security Income (SSI).

In April 2020, CAPO sent a letter to Oregon Housing and Community Services (OHCS) to change documentation requirements to allow the use of categorical eligibility for energy assistance programs. OHCS administers the federal Low Income Home Energy Assistance Program (LIHEAP) and state Oregon Energy Assistance Program (OEAP). The letter was signed by a broad collection of stakeholders, including NW Natural and other utilities.¹ Any customer receiving assistance under any of the above programs would automatically qualify for OLGA assistance.

¹ UM 2058.

The Company also states that it continuously strives to provide its Agencies with an open and adaptable low-income program as the impacts of the COVID-19 pandemic remain widespread.

The filing contains additional changes that are housekeeping in nature. However, there are no proposed changes to any customer rates or charges in this filing.

Thus, on schedule 310, Sheet 310.1, special conditions, No. 4. The Company added:

[E]ach Agency shall follow the established protocols for the qualification of and disbursement to eligible participants in accordance with the guidelines promulgated by OHCS and Oregon Energy Assistance Program (OEAP) or agencies may separately choose to make eligible for assistance any household of which at least one member is a recipient of Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), and benefits under the Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps), and subsequent amendments, as outlined in the OHCS Omnibus Contract.²

Allowing agencies to apply categorical eligibility in the screening process will ease administrative burden for the agencies and expand the reach of energy assistance funding.

Conclusion

Staff supports approval of the Company's filing as it streamlines the review and approval process to receive OLGA assistance.

PROPOSED COMMISSION MOTION:

Approve NW Natural's ADV 1141/Advice No. 20-06 to go into effect for service rendered on and after July 29, 2020, with less than statutory notice.

² Schedule 310. Sheet 310.2 NO. 4.