



Oregon

Kate Brown, Governor

Public Utility Commission

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July 28, 2020



BY EMAIL

Northwest Natural Gas Company, dba NW Natural

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RE: Advice No. 20-6

At the public meeting on July 28, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1141. The Staff Report, a receipted copy of the sheets in your advice filing, and a signed LSN are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

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

REGULAR _____ CONSENT X 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 OLGCA 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.

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Second Revision of Sheet 310-1
Cancels First Revision of Sheet 310-1

SCHEDULE 310 OREGON LOW-INCOME GAS ASSISTANCE (OLGA)

PURPOSE:

To describe the program within which that portion of the funds collected and designated for use for low-income bill payment assistance activities under **Schedule 301** "Public Purposes Funding Surcharge" will be administered and delivered to eligible customers. This program is filed pursuant to ORS 757.315.

APPLICABLE:

To Residential Customers taking service under **Rate Schedule 2** of this Tariff.

SPECIAL CONDITIONS:

1. Funds collected under **Schedule 301** will be disbursed from the OLGA Account directly to individual customer utility accounts based on electronic vouchers received from each participating Community Action Agency ("Agency").
2. All funds collected under this program will be distributed only to income-eligible Residential Customers of NW Natural. Funds distribution will be accomplished using a cashless voucher system. The cashless voucher system will allow the transfer of authorized payments to an individual customer's utility account from the OLGA program account based on an electronic voucher list submitted to the company by each participating Agency. The Company will process vouchers as soon as possible following receipt. In the event the Company receives a voucher authorization for a single customer from two or more agencies, the Company will process only one voucher authorization.
3. In order to participate in the OLGA program, an Agency must be a legal entity, contracting or subcontracting with the State of Oregon, Department of Housing and Community Services (OHCS), which is eligible to administer funding under the Federal Low Income Home Energy Assistance Program (LIHEAP).
4. Each participating Agency will have sole responsibility to screen and approve bill payment assistance applicants for eligibility. Except where funds are specifically authorized by the Company for customized bill payment assistance plans, which may be available from time to time, each 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. Agencies will document enrollment into adjacent poverty programs in client files. As an alternative to providing identification as required in LIHEAP guidelines, bill payment assistance applicants may qualify by providing the identification required for residential service as described in accordance with the provision of General Rule 2 of this Tariff. The amount of assistance from OLGA for eligible participants shall be based on the LIHEAP Poverty Guidelines and Payment Matrix from the OHCS Operations Manual for these programs. Except where different allocations may be allowed under any special program that may be offered during a program year, any voucher authorizations received by the Company that exceed these guidelines will be appropriately adjusted.

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(continue to Sheet 310-2)

Issued June 30, 2020
NWN OPUC Advice No. 20-6

Received
Filing Center
JUN 30 2020

Effective with service on
and after July 29, 2020

LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at puc.filingcenter@state.or.us.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF Northwest Natural Gas Company _____ (UTILITY COMPANY)))))	UTILITY L.S.N. APPLICATION NO. <u>2261</u> _____ (LEAVE BLANK)
TO WAIVE STATUTORY NOTICE.		

NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.

1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)

Second Revision of Sheet 310-1 - Schedule 310 - Oregon Low-Income Gas Assistance (OLGA). Changes reflect the proposed language to enable the use of categorical eligibility guidelines by community action agencies when screening and approving for OLGA energy assistance.

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)

First Revision of Sheet 310-1

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)

Second Revision of Sheet 310-1

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:

The Company seeks changes to enable the use of categorical eligibility guidelines by community aciton agencies when screen and approving for OLGA energy assistance with less than statutory notice in order to be immediately responsive to the changing economic and social conditions facing customers in the wake of the COVID-19 pandemic. NW Natural considers this tariff revision to be practical based on these changing conditions and to be in the best interest of its customers.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): July 29, 2020

. AUTHORIZED SIGNATURE <i>/s/ Natasha Soares</i>	TITLE Manager, Regulatory Compliance	DATE June 30, 2020
PUC USE ONLY		
<input checked="" type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE July 29, 2020	
AUTHORIZED SIGNATURE 	DATE July 28, 2020	