

March 21, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: ADV 1373 / NWN OPUC Advice No. 22-01 – NW Natural’s Comments

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), provides the following comments on the public meeting Staff Report posted in this docket on March 17, 2022.

NW Natural thanks Commission Staff and stakeholders for the ongoing dialogue regarding the Company’s Arrearage Management Program (AMP), which has occurred through informal emails, a stakeholder roundtable, and written comments. We appreciate the substantive and thoughtful consideration and recommendations received from Oregon Citizens’ Utility Board, Community Energy Project, Multnomah County Office of Sustainability, and NW Energy Coalition.

The public meeting Staff Report posted March 17, 2022, recommends approval of the Company’s request in this proceeding, along with the following conditions and considerations:

- Increase the program participation cap to \$1,500.
- Increase the instant grant option to \$600.
- Increase the Low-Income Instant Grant Option (LIIGO) to \$1,500.
- Establish a self-certified income qualifier for all proposed Schedule R programs at 300 percent of the Federal Poverty Level (FPL) and below.
- Establish a self-certified income qualifier for the LIIGO that allows customers to self-certify household income at less than or equal to 60 percent SMI2 to receive up to \$1,500 toward their arrearage balance without a matching requirement or proof of crisis.
- Supplement existing quarterly reports with AMP participation data reported by month and 5-digit zip code.

NW Natural’s Response to Staff’s Memo

Response to Recommendation

NW Natural agrees with Staff’s recommendation to increase the program participation cap and LIIGO to \$1,500, as well as the instant grant option to \$600.¹ Increasing these amounts will allow the AMP to provide a greater level of assistance to customers. Also, the Company is currently

¹ NW Natural notes that it always intended for the program participation cap and the LIIGO cap to be the same.

reporting monthly AMP data by zip code in its quarterly COVID report in docket RG 94 as required by Order No. 20-401.

NW Natural, however, respectfully opposes the income-qualifier conditions as proposed in Staff's Report because it introduces a barrier to participation that does not exist today. The Company is concerned that this new barrier would prevent some customers from receiving help during the heating season and before the high-arrearage season (i.e., the April to May timeframe). NW Natural has found that a similar income barrier in its Washington service territory has led to a significantly lower participation rate relative to Oregon's Arrearage Management Program (AMP).² Implementing this barrier to participation will likely create confusion for our customers. As detailed below, NW Natural has engaged in a robust community outreach program to raise awareness of the AMP since the program's inception. During this outreach, the Company has not advised customers that income self-certification is a requirement for participation. We are concerned that implementing this condition now may cause some customers to question, and possibly distrust, NW Natural's programs going forward.³

Moreover, the income threshold proposed by Staff is a significant change to the program that would require time and resources to implement that were not contemplated when the AMP was originally developed and filed.⁴ The time spent developing new processes to implement the new income-qualifier condition proposed by Staff, and then training all of NW Natural's Customer Service Representatives (CSRs) to adhere to the new process will materially affect the pace at which NW Natural can distribute AMP funds to its customers during a very critical time of year where arrearages are at their highest.⁵

For these reasons, NW Natural proposes that the Commission does not adopt the income-qualifiers proposed by Staff.

Response to Alternative Consideration.

In Staff's memo, Staff provided an alternative consideration which stated:

"Staff recognizes the dynamic nature of NW Natural's proposal and the constraints imposed by the current availability of AMP funds. Staff also notes that the spirit of interim action is to ensure relief continues to be available while differential rate options are being developed. If the Commission believes that Staff's recommendations require further exploration, the Commission may choose to approve NW Natural's proposal without modification and direct the Company to investigate Staff's recommended near term modifications and propose additional to the AMP by the end of May 2022."

² The AMP in Washington is limited to customers at or below 200% FPL, per the COVID-19 agreement among utilities and stakeholders.

³ For more information on the AMP community outreach plan, please see attached AMP workshop presentation at slides 10-15; the AMP brochure is on slide 7.

⁴ NW Natural notes that the extended funding approved on September 7, 2021, for Portland General Electric Company's Residential Bill Assistance Program in ADV 1301 did not include an income qualifier.

⁵ This is still a high-call volume time of year so the required CSR training to implement a new version of our AMP could have customer service impacts.

NW Natural appreciates this alternative and commits to working with Staff and stakeholders on the timeline proposed by Staff.

NW Natural's AMP Outreach Targets Communities In-Need.

With its current proposal to increase AMP funding, NW Natural's intent is to leverage the success of the AMP by extending available funding to assist customers through the 2021-2022 heating season and high-arrearage season. The focus of the proposal was to address the hardships potentially faced by all customers with arrearages due to COVID-19 while continuing the community outreach targeted to low-income, fixed-income and hard-to-reach communities. Our five-language AMP brochure has been distributed to customers in a targeted and thoughtful manner, as evidenced by the following four examples out of the more than 140 organizations with which we have been working:

- **Portland Public Schools** – 15,000 brochures provided to families through:
 - Counselors and social workers at 40 schools with the highest percentage of families eligible for free lunch programs
 - Direct mail to families that qualify for free lunch programs
- **Meals on Wheels**
 - Talking points about the AMP were included in the script for the weekly check-in calls to ~1,000 Meals on Wheels clients; these clients are at or below 200% FPL
 - 5,000 physical brochures provided to Meals on Wheels chapters in all counties in NW Natural's service territory
- **Tri-Met**
 - AMP brochure was sent to every rider in Tri-Met's reduced fare program – this included 13,000 email addresses. Tri-Met's reduced fare program requires income qualification verified by non-profit organizations and targets veterans, seniors, individuals with disabilities and individuals who earn less than 200% FPL.
- **Mobile Home residents**
 - Direct mailing of AMP brochure to customers living in a mobile home park in Lane, Multnomah, and Washington counties (~1,100 residents).
 - While there are no income qualifiers for this focus area, NW Natural is confident that focusing on this sector will reach income-eligible customers.

Keeping the mechanics and design of the Company's AMP as flexible as possible, when combined with robust community outreach focused entirely on low-income, fixed-income and hard-to-reach communities has resulted in a successful AMP that focuses on meeting customers' needs while maintaining low barriers to access.

By adding the LIIGO after discussions with Commission Staff, NW Natural believes that its current proposal is better targeted to meeting customers' needs. While this low-income enhancement to the AMP proposal was intended as a first step in the Company's plan to provide relief to energy-burdened customers and a bridge to the Company's first HB 2475 program⁶, it was not meant to limit the flexibility of the Program. Rather, NW Natural believes that the Program has been successful due to its interchangeable grant options and the ease of enrollment that requires only

⁶ Please see attached NW Natural's HB 2475 Interim Action Plan that was filed in docket UM 2211 for additional information on the Company's current plan for HB 2475 programs.

expression of hardship with an arrearage balance. As described above, NW Natural will also commit to Staff's Alternative Consideration, if it is acceptable to the Commission.

Respectfully submitted,

/s/ Natasha Siores

Natasha Siores
Manager, Regulatory Affairs

Attachments:

1. NW Natural presentation for ADV 1373 Stakeholder workshop
2. NW Natural's Interim Action Plan filed in docket UM 2211

Arrearage Management Program Proposal and Update



Darcy Noxon, Cecelia Tanaka, Natasha Siores
March 4, 2022



Welcome

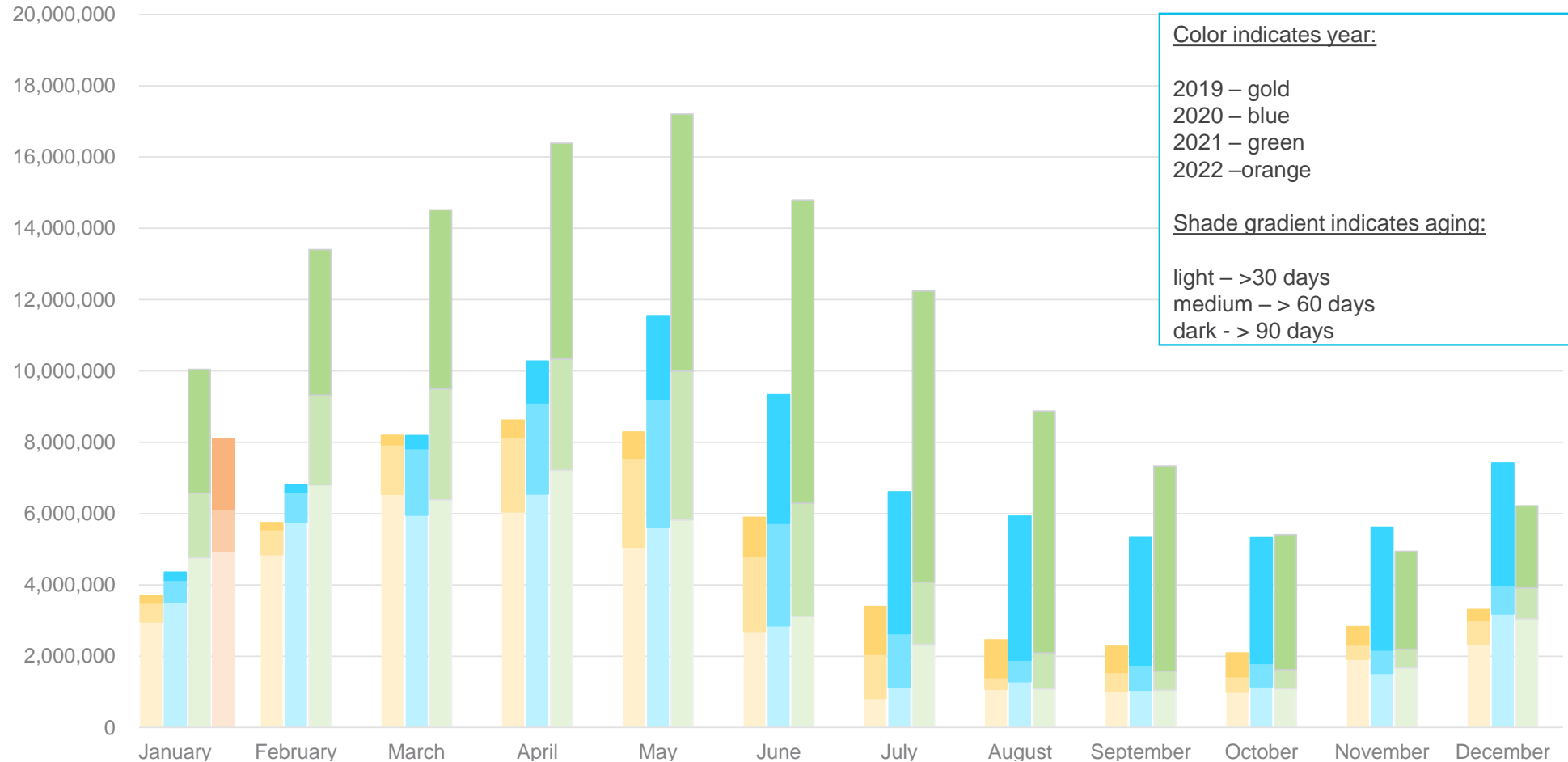


- AMP Update
- AMP Funding Request & Proposed Change
- Community Outreach Update

Arrearage Activity



2019-2022 Residential Arrearages by Aging - Oregon



Current AMP Overview



Launched May 3, 2021 – funding of 1% of retail revenues ~\$6.167 million

Instant Grant Option

- Up to a \$300 grant for a residential customer with a smaller past due or full balance who expresses economic hardship.

50/50 Matching Grant Option

- Up to a \$600 matching grant applied as a credit on a residential customer's account to eliminate a past due or full balance.

Time Payment Arrangement (TPA) with Matching Grant Option

- Up to a \$1,200 grant; an option that offers a TPA to a residential customer who then receives a matching grant payment to reduce their past due balance each time their own monthly TPA payment posts.

Frequency of Participation

- Residential customers can participate in the AMP in any combination of options up to a maximum contribution from the Program of up to \$1,200.

NW Natural AMP Summary



May 3, 2021 – February 28, 2022

Total AMP Funding of \$6,167,000

Grant Type	Number of Households	Total Funds Granted
Instant Grant – up to \$300	17,171	\$4,260,597
50/50 Matching Grant – up to \$600	4,676	\$914,768
TPA w/Matching Grant – up to \$1,200	3,828	\$532,863
Crisis Grant – up to \$1,000	236	\$197,474
Total	23,700	\$5,905,702
Percentage of Total Granted or Committed		95.76%

Proposed AMP Enhancements



Proposal filed on February 17, 2022 – docket ADV 1373

- Add new Low-Income Instant Grant Option
 - Customers would be deemed “low-income” based on receiving Energy Assistance and being income-qualified since 2019 and auto-enrolled for an instant grant if they have an arrearage balance.
 - Addresses the needs of low-income customers impacted by the economic repercussions of the COVID-19 pandemic in a simple manner that doesn’t present any barriers to customers receiving economic relief.
- Request for an additional 0.5% in AMP funding ~\$3.1 million
 - \$750,000 of this funding set aside for the new Low-Income Instant Grant Option.
 - Provides arrearage relief to customers through the heating season as the COVID-19 pandemic persists and related economic impacts continue.
 - Additional funding provides needed arrearage relief through the spring months, which typically have been the months when NW Natural customers experienced the highest arrearage balances in the pre-pandemic period.

AMP Brochure & Flyer



We're Here to Help.
Call us about new instant grants and bill assistance options

During this challenging time, we can provide options that can help you pay off past-due account balances, manage bills, and lower monthly payments.

Please contact us today to see which options may work best for you.

OUR AVAILABLE OPTIONS INCLUDE:

NEW instant grant program
Customers in need can choose several grant options available to help with a past-due balance. This new program provides instant **grants of up to \$300** and even more options for larger balances. A grant can be used to help offset the cost of a payment plan or pay off a past-due account balance.

Flexible payment plans
We have a variety of payment plans to help you manage a past-due account balance. If you're already on a payment plan, we can review your account and existing plan to consider a different plan option.

Local energy assistance programs
If you're on a limited or fixed income and need continued help paying your bills, we partner with local agencies throughout Oregon that offer energy assistance options.

CALL NOW
844-795-9377

Available funding for the new instant grant program is limited, so please call us as soon as possible at **844-795-9377**, 7 a.m. to 6 p.m., Monday through Friday. NW Natural's customer service team can assist you in additional languages by interpreter.

For general information, please visit nwnatural.com/flyer/paymentassistance.



WE'RE IN THIS TOGETHER.

Electricity providers also have programs available to help customers with past-due account balances.



If your electricity is provided by PGE:
Visit: portlandgeneral.com/matchmypayment
Call: **800-542-8818**, 7 a.m. to 7 p.m., Monday through Friday



If your electricity is provided by Pacific Power:
Visit: pacificpower.net/assistanceplus
Call: **888-221-7070**, 7 a.m. to 6 p.m., Monday through Friday

Estamos aquí para ayudarle.

Llámenos para obtener información sobre las subvenciones temporales y las opciones de asistencia para las facturas.

Chúng tôi sẵn sàng giúp đỡ quý vị.

Gọi cho chúng tôi về các chương trình trợ cấp tạm thời cũng như các chương trình trợ cấp hóa đơn.

Trong thời gian đầy thử thách này, chúng tôi có thể cho quý vị một vài lựa chọn để giúp quý vị thanh toán các tài khoản.

Мы ГОТОВЫ ПОМОЧЬ.

Позвоните нам по вопросам выдачи временных грантов и вариантов получения помощи в оплате счетов.

В это непростое время мы имеем возможность предложить варианты, которые помогут вам урегулировать долги.

我们的宗旨就是为您服务。

致电我们，以了解临时补助和账单援助选项。

在当下充满挑战的时期，我们可以提供多种选项，帮助您解决任何逾期账户余额、管理账单以及降低每月付款。

请今天就联系我们，了解最适合您的选项。

我们的可用选项包括：

新临时补助计划
有需要的客户可能有资格从三个可用选项中选择一项，以清除您的逾期余额。这项新的临时计划提供最低 **300** 美元的财务补助。补助可用于帮助抵销长期付款计划的费用或还清逾期账户余额。

灵活的付款计划
我们有多种付款计划，可帮助您管理逾期账户余额。如果您已经使用付款计划，我们可查看您的账户和现有计划，或考虑使用不同的计划选项。

本地能源援助计划
如果您只有有限或固定的收入，需要持续的援助才能支付账单，我们将与俄勒冈州和华盛顿州提供能源援助选项的本地机构合作。

我们一起努力！

电力提供商还提供多项可用计划，以帮助客户处理逾期账户余额。

如果您的电力提供商是 PGE:
请登录网站: portlandgeneral.com/matchmypayment
请致电: **800-542-8818** (周一到周五上午 7 点到下午 7 点)

如果您的电力提供商是 Pacific Power:
请登录网站: pacificpower.net/assistanceplus
请致电: **888-221-7070** (周一到周五上午 7 点到下午 6 点)

CALL NOW - 844-795-9380

新补助计划仅短时间内有效。请在周一至周五上午 7 点至下午 6 点拨打 **844-795-9380**，联系我们。NW Natural 的客户团队可通过口译翻译员为您提供其他语言的帮助。

欲了解一般信息，请登录网站 nwnatural.com/flyer/paymentassistance。

Impacts on Business Processes



- Customer contacts increased when past-due notices resumed last summer.
 - Major escalation in call volumes and AMP activity in late-September and October with resumption of disconnections for non-payment and start of heating season.
- Has required management of heavy queues at times/more customers opting for callbacks.
- CSRs having increased number of customer discussions focused on arrearage management options, energy assistance, extended TPAs, and combinations of options.
- Based on recent AMP usage patterns, fund should be available to customers through the end of 2021.
- New Energy Assistance Program Year began on October 1 – LIHEAP + 3 additional LIHEAP funding sources from COVID-19 legislation (CARES, EASCR, ARPA), OLGA and major GAP fundraising effort begins in November.
 - Low-income customers are eligible for energy assistance and AMP funds.

Other Energy Assistance Programs



Energy Assistance Program	Number of Households	Total Benefits
Program Year 2021-2022		
GAP	211	\$ 20,550.00
OLGA	2,621	\$ 1,090,198.00
LIHEAP	2,335	\$ 747,460.77
Totals	5,167	\$ 1,858,208.77
Program Year 2020-2021		
GAP	1,135	\$ 122,029.00
OLGA	5,044	\$ 2,243,670.00
LIHEAP	5,241	\$ 1,755,170.76
Totals	11,420	\$ 4,120,869.76

Distributed \$758,225 more in Energy Assistance funds to 1,592 more households in the 2020-2021 Program Year vs. the prior 2019-2020 Program Year. On track for a similar distribution in the 2021-2022 Program Year.

Enhanced Community Outreach Strategies NW Natural®

- Implement new methods to communicate and disseminate information; create menu of new materials to amplify message
- Employ creative solutions to reach hardest to access populations
- Deliver information through trusted partners to encourage engagement; co-create strategies with partners to align with who they serve and how
- Establish and strengthen relationships with nonprofit community
- Deploy company-wide effort; leverage employee base to expand and diversify outreach
- Create partner list of over 140 distinct community-based partners; engage directly; review unique and effective methods to reach client base
- Translate resources into Spanish, Russian, Chinese and Vietnamese; source paid services from Immigrant and Refugee Community Organization (IRCO)

Enhanced Community Outreach Activities NW Natural®

Highlights & Targeted Outreach – key partners, approaches and evolving strategy

- Partner-activated outreach: check-in calls, e-newsletters, organization-wide emails, social media, school and food bank meals, school counselors, housing specialists, etc.
- Schools: 15,000 brochures to Portland and Clackamas districts [counselors, social workers & nutrition hubs]; prioritize higher-need areas; Portland Public Schools → NW Natural customer referral process; continued outreach through fall; November mailer to families on Free/Reduced meals; interpretation services for school staff to help families apply for assistance
- Seniors: 5,000 brochures to Meals on Wheels chapters; e-newsletter to Oregon senior nutrition provider network; over 70 representatives of healthcare providers, Area Agency on Aging staff, state and local government contract funders

Approach – engage partners with large networks, close ties to priority populations and trust of community

- Large networks: Energy Trust of Oregon, Housing Oregon, Oregon Energy Fund
- Culturally-specific: IRCO, Hacienda CDC, Latino Network, Chinese Garden, Oregon Chinese Consolidated Benevolent Association
- NW Natural: 2,500 brochures to field technicians to share with customers; community action managers (North, South and Central Coasts, Gorge)



Enhanced Community Outreach

Key initiatives since November presentation

TriMet

- New partnership with TriMet – TriMet to send AMP brochure to riders participating in reduced fare programs
 - List of 13,000 email addresses
- On the horizon – AMP information to nonprofits that deliver reduced fare tickets to riders and ad space on TriMet transportation
- Low-Income Programs – income threshold aligns with NWN and verified by nonprofit organizations

Mobile Home Parks

- AMP brochure to be mailed to mobile home park customers in Lane, Multnomah and Washington Counties (three most populous counties for NWN)
 - Used publicly available list of parks and paired it with NWN data to generate active service record list
- On the horizon – expansion to Hood River, Marion & Clackamas Counties
- Low-Income Programs – median income of mobile home residents is half that of all homeowners and mobile home residents pay 70% more in energy bills

Seniors

- Expanded outreach partnership with **Meals on Wheels, Friendly House & Hollywood Senior Center**
- Home assessments to identify safety hazards – AMP to be added to Home Visit Checklist & annual check-in and onboarding
- Low-Income Programs – referrals to **local CAP agencies** for weatherization and additional energy assistance

Enhanced Community Outreach – Examples



PROUD GROUND
Homeowner Newsletter
Summer 2021

Proud Ground Announcements

Proud Ground recently conducted a survey with homeowners, exploring how to best support them and received some great ideas, thank you to all those that participated! Based on this feedback, Proud Ground is offering four different...

Instant Grant Payment Assistance Program for overdue bills - NW Natural customers in Oregon with a past-due balance may be able to receive instant grants of up to \$300, and even more options for larger balances. For more information, call NW Natural at: 844-795-9378. For general information, visit nwnatural.com/community/paymentassistance.

Community Action Hillsboro, Oregon
Published by Gina Brooks · September 22 ·

Did you know that NW Natural has payment plans and financial assistance grants for customers who have past due payments on their accounts? Grants can be used to help offset the cost of a payment plan or pay off a past-due account balance. To learn more, please follow the link below!
<http://ow.ly/GjuY50G88Ez>

NW Natural
September 22 ·

If you need help making a past-due payment, please contact us to discuss options. Financial assistance grants may also be available. <http://ow.ly/GjuY50G88Ez>

English | Español | Русский | العربية | 简体中文 | Tiếng Việt

IMPACT NW
PREVENTING HOMELESSNESS

Don't turn your NW Natural Gas off this summer—we can help!

Impact NW Energy Assistance can help you with NW Natural bills so you don't have to turn off your service this summer!

Multnomah County
Department of County Human Services > Intellectual & Developmental Disabilities

Utility Assistance

Menu

NW Natural®

Utility Assistance

- Customers may be able to receive assistance and choose several grant options available to help with a past-due balance. This new program provides instant grants of up to \$300 and even more options for larger balances. A grant can be used to help offset the cost of a payment plan or pay off a past-due account balance.

Call 211 or visit [current information about utility assistance resources](#).

City of Corvallis Oregon

Community | Doing E

COMMUNITY DEVELOPMENT

Report a Problem | Renters & Landlords | COVID-19

NW Natural Gas: NW Natural Gas customers who are behind in their payments can request a temporary payment plan and consideration for the Oregon Arrearage Management Plan that offers grants to resolve outstanding balances. Call Customer Service at 800-422-4012 for qualifications and to enroll in customer payment plans.

Enhanced Community Outreach – Examples



PORTLAND PUBLIC SCHOOLS Portland, Oregon
501 N. Dixon St. • Portland, OR 97227 • (503) 918-2000

About Schools & Learning Services Volunteer Jobs Board Policies Departments

Information About Help for Families to Pay Rent and Utility Bills

October 15, 2021
Español | Tiếng Việt | 中文 | Soomaali | Русский

Dear PPS Families,

We want to share information about rental and utility assistance that can help families struggling to pay their bills as a result of the COVID-19 pandemic.

Rental Assistance

The Oregon Emergency Rental Assistance Program will cover up to 12 months of past due rent and three months of forward rent, once all past due rent is paid. The program will also cover past due utility costs including electricity, gas, home energy services, water, sewer, trash removal, internet and bulk fuels.

- To apply directly for rental and utility assistance online visit: oregonrentalassistance.org (application is available in English, Spanish, Chinese, Vietnamese and Russian).
- Provide proof that you applied to your landlord to avoid eviction for 90 days while you are on the program (Multnomah County). Renters have until February 28, 2022 to pay overdue rent (for those who have received an eviction notice, call the [Eviction Defense Project](#) at 888-585-9638 to understand your options for free legal assistance.

Direct Utility Assistance

Utility companies are also offering their own assistance programs, regardless of household income. To qualify, you must be a resident of Oregon and have a household income at or below 200% of the federal poverty level.

- Pacific Power: Up to \$300 forgiven. Go to pacificpower.net/assistanceplus or call 1-800-455-4545.
- PGE: Up to \$500 matching grant. Go to portlandgeneral.com/help/covid-19/helping or call 800-542-8818.
- NW Natural: Up to \$300 forgiven. Go to nwnatural.com/paymentassistance or call 1-800-422-4012.

For questions or other referrals, please call 2-1-1 or visit 211info.org. You may also contact your utility provider if you need more information or resources.

PPS Communications <ppscomms@pps.net>
Sent: Monday, October 21, 2021 at 5:44 PM
Subject: PPS Update: Board to consider making Nov. 12 an educator development day; more than 96% of employees vaccinated; help to pay bills for families

PORTLAND PUBLIC SCHOOLS | OCTOBER 21, 2021

UPDATE

Information About Help for Families to Pay Rent and Utility Bills

We want to share information about rental and utility assistance that can help families struggling to pay their bills as a result of the COVID-19 pandemic.

oregon energy FUND

DONATE MENU

A woman wearing a hijab is sitting on a couch, talking on a mobile phone while looking at a laptop.

CAN THE CULLY ASSOCIATION OF NEIGHBORS

NW Natural
NW Natural has stated that "We will not disconnect customers who can't make a payment due to impacts caused by the coronavirus. Customers will continue to receive bills and past-due notices. But NW Natural will not send a final shut-off notice and disconnect service."
Customers can contact 800-422-4012 with questions or to make payment arrangements.

Oregon Utilities Offer COVID-19 Debt Relief Programs for Customers

NEWS July 7, 2021

Do you or someone you know need help paying your bills because of the COVID-19 pandemic? Your utility may be able to help! Portland General Electric, Pacific Power, NW Natural, Avista, Cascade Natural Gas, and Idaho Power have all announced debt relief plans for Oregon customers...

List of Outreach Partners & Networks



Abilities at Work	Dress for Success	Maybelle Clark Macdonald Fund	School Districts – Beaverton, Gresham, North Clackamas, Portland Public Schools
AGE+	Eastco Diversified Services	Meals on Wheels – NWN footprint	SnowCap
Albertina Kerr	Energy Trust of Oregon	Mercy Connections	Society of St Vincent de Paul
Amani Center	Farmworker Housing Development Corporation	Metropolitan Family Service	Tribal Housing
Ambleside Meals People	Food for Lane County	Meyer Memorial Trust	TriMet
AntFarm	Friendly House	Mid-Columbia EDC	United Way of Columbia County
Area Agency on Aging Network	Friends of the Milwaukie Center	Miller Foundation	Verde
Birch Community Services	Grantmakers of OR & SW Washington	Molalla Adult Community Center	Vernonia's
Canby Center in Canby	Hacienda CDC	My Fathers House	Virginia Garcia Memorial Health Center
Catholic Charities	Holla	Neighborhood House	Voice
Centro Cultural	Hollywood Senior Center	The Next Door	Volunteers of America
CAP – Catholic Community Services	Homes for Good	Oregon Community Foundation	Worship – Lake Oswego United Methodist
CAP – Clatsop Community Action	Hood River Valley Adult Center	Oregon Energy Fund	Worship – Our Lady of the Lake
CAP – Community Action Washington County	Housing Alliance	Oregon Food Bank	Worship – West Linn Lutheran
CAP – Community Action Agency	Housing Oregon	Oregon Law Center	Worship – Jaya Hanuman Temple & Cultural Center
CAP – Community Action Team	Human Solutions	Oregon Senior Nutrition Provider network	Worship – Miao Fa Temple
CAP – Community Services Consortium	Imago Dei Community	Oregon State Tenants Association	Worship – Muslim Community Center of Portland
CAP – Mid-Columbia Community Action Council	Impact NW	OSU Extension Service	Worship – Portland Hindu Temple
CAP – Oregon Coast Community Action	IRCO	Outside In	Worship – Trinity Full Gospel Pentecostal
CAP – Yamhill County CAP	Kairos PDX Ore	Pioneer Community Center	Worship – Zen Community of Oregon
Chinese Consolidated Benevolent Association	KOHI Radio	Portland Homeless Family Solutions	Worship – Grace Memorial Episcopal Church
Collins Foundation	Lan Su Chinese Garden	Proud Ground	Zarephath Kitchen and Pantry
Community Warehouse	Latino Network	Raphael House	
Country Media	LatinoBuilt	Reading Results	
Dev NW	LifeWorks	Safe & Sound	
	Livelihood NW	Salvation Army – Portland	
		SEI	



Thank you.



250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

February 28, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: UM 2211—NW Natural's Interim Action Plan

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), provides its interim action proposal to implement HB 2475 programs and activities as requested by Commission Staff's Interim Action Proposal in this docket.

Currently, NW Natural's action plan for implementing HB 2475 programs and activities include: i) proposing revisions to its Arrearage Management Program (AMP); ii) developing a low-income bill discount program to be in place by the next heating season; iii) conducting a Low-Income Needs Assessment (LINA); and iv) developing a long-term low-income rate program that is informed by the LINA and Staff's HB 2475 investigation in docket UM 2211. We note that additional activities may be added to this plan as we continue to learn more about useful programs and tools through the UM 2211 investigation.

AMP Enhancements

On February 17, 2022, NW Natural filed tariff revisions to its AMP seeking additional funding for the program and to add an additional grant type to serve income-eligible customers. Our AMP proposal meets Commission Staff's HB 2475 Interim Action Framework that calls for natural gas companies to provide enhanced bill assistance for low-income customers to address winter heating balances before interim differential rate programs are put in place. In addition, NW Natural's AMP communications focus on community outreach through relationships built with organizations, agencies, and other partners with close ties to low-income, energy-burdened, and hard-to-reach customers.

A stakeholder workshop on NW Natural's AMP proposal will be held on March 4, 2022.

Interim Low-Income Bill Discount Program

NW Natural is in the process of developing a low-income bill discount program that will be filed by April 2022, and, if approved, will be put in place for the 2022-2023 heating season. Through the program, NW Natural intends to direct assistance to its most energy-burdened customers in a manner that has minimal barriers for participation and is easy to access. In addition, the Company hopes to coordinate the parameters of its program with those of the electric utilities that also serve our customers to further accommodate an efficient experience for customers to obtain energy assistance. NW Natural looks forward to working with stakeholders and Staff in developing and implementing this program.

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LINA

NW Natural is working with a third-party consultant to perform a LINA to better understand the needs of our customers and effective ways to serve and assist them. The study will help the Company better understand the income constraints and energy burden of our customers, which will inform our understanding of how to design long-term low-income rate programs. The LINA will be completed by mid-year.

Long-term low-income rate program

Through the completion of the LINA, as well as learnings from Staff's UM 2211 investigation and our upcoming interim low-income bill discount program, NW Natural hopes to be well-positioned to develop a potentially comprehensive long-term low-income rate program that meets the needs of its most energy-burdened customers and the expectations of HB 2475. NW Natural expects that identification and development of the long-term low-income rate program will begin in 2023.

Finally, NW Natural is pleased to announce the establishment of our Community and Equity Advisory Group (CEAG) in 2022, which will include a broad panel of representatives from community-based organizations who can share their expertise and knowledge of the communities they serve. We look forward to having the CEAG as a resource to assist the implementation of the elements of our action plan.

NW Natural looks forward to developing the programs and rates contemplated by HB 2475 to better serve and assist energy-burdened customers and appreciates the opportunity to continue participating in the UM 2211 proceeding.

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