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January 24, 2023

NWN OPUC Advice No. 23-01

VIA ELECTRONIC FILING

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

**Re: Schedule 31 – Non-Residential Firm Sales and Firm Transportation Service and
Schedule 32 – Large Volume Non-Residential Sales and Transportation Service**

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following revisions to its Tariff P.U.C. Or. 25, stated to become effective March 1, 2023.

Fifth Revision of Sheet 31-2	Schedule 31	Non-Residential Firm Sales and Firm Transportation Service (continued)
Third Revision of Sheet 31-3	Schedule 31	Non-Residential Firm Sales and Firm Transportation Service (continued)
Sixth Revision of Sheet 32-2	Schedule 32	Large Volume Non-Residential Sales and Transportation Service (continued)
Fourth Revision of Sheet 32-3	Schedule 32	Large Volume Non-Residential Sales and Transportation Service (continued)

Purpose

The purpose of this filing is to request revisions to Schedules 31 and 32 to change the Annual Service Election from July 31 to June 30 for the annual November 1 through October 31 Purchased Gas Adjustment (PGA) Year.

Background

The Annual Service Election is the date by which a Customer may request to change all or a portion of their Service Type Selection for the following November 1 through October 31 period (PGA Year). When there is no Customer requested change under this Annual Service Election provision, then for the next PGA Year commencing November 1 the Customer's Service Type and related billing options, including the Commodity Component option for Sales Service Types, will default to the same Service Type and billing options that are in effect at the close of the current Annual Service Election period.

Proposed Changes

NW Natural proposed to change the Annual Service Election from July 31 to June 30. Moving the Annual Service Election to June 30 will make the PGA more streamlined and improve the PGA review process for Commission Staff and Stakeholders. Changing the Annual Service Election to June 30 will allow NW Natural to make its August 1 PGA Filing with updated load forecast informed by the recent service elections and remove the need to update the load forecast between the

August 1 PGA filing and the September 15 PGA filing, which will ease review of the PGA for Commission Staff and Stakeholders.

The Company has discussed moving the Annual Service Election to the end of June with the Alliance of Western Energy Consumers and Commission Staff, and both have expressed support for this change.

Conclusion

NW Natural respectfully requests that the Commission approve the proposed revisions of the enclosed tariff sheets to become effective with service on and after March 1, 2023.

In compliance with OAR 860-022-0025, NW Natural states that the tariff changes proposed in this filing will affect those customers on Schedules 31 and 32 that choose a service election; therefore, the number of customers affected is not known at this time. There is no impact to NW Natural's annual revenue resulting from the proposed tariff changes.

In accordance with ORS 757.205, copies of this letter and the filing made herewith are available in the Company's main office in Portland, Oregon and on its website at www.nwnatural.com.

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

eFiling
NW Natural Rates & Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204
Fax: (503) 220-2579
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Respectfully submitted,

/s/ Kyle Walker

Kyle Walker
Rates/ Regulatory Manager

RATE SCHEDULE 31
NON-RESIDENTIAL FIRM SALES AND FIRM TRANSPORTATION SERVICE
(continued)

GENERAL OBLIGATIONS APPLICABLE TO EACH SERVICE TYPE: (continued)

Where an AAMR device is installed and used for billing purposes, Customer must promptly restore electric power to the AAMR device following an outage, no matter the cause. If failure to restore electric power service to the AAMR device within thirty (30) days of notice from the Company can reasonably be assumed to be within the Customer's control, it is cause for the Company to reassign Customer to another Rate Schedule or another Service Type Selection that does not require an AAMR device.

Where the Customer premise is a Participant Multi-Family Building, Customer must ensure that the houseline, valves, and gas appliances installed under Schedule 405 remain in place and available for use at all times. NW Natural shall be granted free and unobstructed access to the valves installed on such houseline and shall be granted authority to place Company-owned locking devices on each valve as deemed necessary by the Company.

ANNUAL SERVICE ELECTION – June 30 Election for November 1 Service:

The Annual Service Election is the date by which a Customer may request to change all or a portion of their Service Type Selection for the following November 1 through October 31 period (PGA Year). All requests must be received by the Company on or before June 30 and will be effective the following November 1. Except as identified in this Rate Schedule under "OUT-OF-CYCLE TRANSFERS," a Customer may not make a change to their Service Type Selection at any other time.

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(C)

This Annual Service Election Provision shall apply to Customer-requested changes to any or all of the following components of a Service Type Selection: (1) Service Type, (2) Commodity Component (Sales Service Types only); (3) Pipeline Capacity Charge billing option (Firm Sales Service Type only), or (4) Firm Sales Service daily delivery volumes (Combination Service Type only).

When there is no Customer requested change under this Annual Service Election provision, then for the next PGA Year commencing November 1 the Customer's Service Type and related billing options, including the Commodity Component option for Sales Service Types, will default to the same Service Type and billing options that are in effect at the close of the current Annual Service Election period.

Transfers between Sales Service and Transportation Service are further subject to the provisions in this Rate Schedule under "APPLICATION OF TEMPORARY ADJUSTMENTS TO RATES (Account 191 Adjustments)."

The Service Types available under this Rate Schedule and the required selections for each Service Type are set forth below. See "DESCRIPTION OF SERVICE TYPES AND REQUIREMENTS FOR SERVICE" in this Rate Schedule for additional information:

Sales Service Types:

Customer must select one of two Commodity Component options: (1) Annual Sales WACOG, or (2) Winter Sales WACOG. Customer will have until August 15 to select the Winter Sales WACOG option (for a term of November 1 through March 31). If no selection is made, the Commodity Component option will default to Annual Sales WACOG. The Customer that selects Winter Sales WACOG will be billed at Monthly Incremental Cost of Gas (Schedule 150) effective April 1 through October 31. If no other change in Service Type was previously requested, either as an Out-of-Cycle Transfer or with this Annual Service Election, the Winter Sales WACOG Commodity Component will automatically restart for billing effective the following November 1 through March 31 period.

Firm Sales Service

Customer must select one of two Pipeline Capacity Charge options:

- i. Volumetric
- ii. MDDV

(continue to Sheet 31-3)

RATE SCHEDULE 31
NON-RESIDENTIAL FIRM SALES AND FIRM TRANSPORTATION SERVICE
(continued)

ANNUAL SERVICE ELECTION – June 30 Election for November 1 Service: (continued)

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Transportation Service Type: *

Firm Transportation Service

* Customer will automatically be placed on a month-end billing cycle

Combination Service Types*:

For Sales Service, Customer must select one of two Commodity Component options: (1) Annual Sales WACOG, or (2) Winter Sales WACOG. Customer will have until August 15 to select the Winter Sales WACOG option (for a term of November 1 through March 31). If no selection is made, the Commodity Component option will default to Annual Sales WACOG (November 1 through October 31). The Customer that selects Winter Sales WACOG will be billed at Monthly Incremental Cost of Gas (Schedule 150) effective April 1 through October 31. If no other change in Service Type was previously requested, either as an Out-of-Cycle Transfer or with this Annual Service Election, the Winter Sales WACOG Commodity Component will automatically restart for billing effective the following November 1 through March 31 period.

Firm Sales Service with Firm Transportation Service

- Customer must specify an exact daily delivery volume to be billed at Firm Sales Service
- Customer may specify an hourly delivery volume in their Service Election form. The total hourly delivery volume for any given 24-hour period must not exceed the total specified Firm MDDV.
* Customer will automatically be placed on a month-end billing cycle

The terms and conditions for submission and approval of a Service Type Selection are identified under "SERVICE TYPE SELECTIONS – PROCESS AND PROCEDURE" of this Rate Schedule. A Customer need not submit a Service Election Form if the Customer desires to retain its current Service Type Selection for the next PGA Year.

RATE SCHEDULE TRANSFERS:

A transfer between Rate Schedules will be allowed upon one Billing Month advance notice to the Company. Any request to also change the Service Type Selection must comply with the provision for "OUT-OF-CYCLE TRANSFERS FOR CERTAIN SERVICE TYPES" set forth in this Rate Schedule. Customer eligibility for a Rate Schedule transfer is as follows:

New Customer. A Customer with an account for gas service to the Premise to be served by this Rate Schedule that was opened within the most recent 12 calendar months may transfer to any other Rate Schedule upon appropriate advance notice. Once a transfer is made, a second transfer cannot be made from that Rate Schedule until Customer has completed a minimum of 12 consecutive Billing Months.

Existing Customer. A Customer that has fulfilled 12 months of continuous service under this Rate Schedule may voluntarily transfer to another Rate Schedule at any time upon appropriate advance notice. Once a transfer is made, a second transfer cannot be made from that Rate Schedule until Customer has completed a minimum of 12 consecutive Billing Months

(continue to Sheet 31-4)

RATE SCHEDULE 32
LARGE VOLUME NON-RESIDENTIAL SALES AND TRANSPORTATION SERVICE
 (continued)

GENERAL OBLIGATIONS APPLICABLE TO EACH SERVICE TYPE: (continued)

Where an AAMR device is installed and used for billing purposes, Customer must promptly restore electric power service to the AAMR device following an outage, no matter the cause. If failure to restore electric power to the AAMR device within thirty (30) days of notice from the Company can reasonably be assumed to be within the customer's control, it is cause for the Company to reassign Customer to another rate schedule or another Service Type Selection that does not require an AAMR device.

Where the Customer premise is a Participant Multi-Family Building, Customer must ensure that the houseline, valves, and gas appliances installed under Schedule 405 remain in place and available for use at all times. NW Natural shall be granted free and unobstructed access to the valves installed on such houseline and shall be granted authority to place Company-owned locking devices on each valve as deemed necessary by the Company.

ANNUAL SERVICE ELECTION – June 30 Election for November 1 Service:

The Annual Service Election is the date by which a Customer may request to change all or a portion of their Service Type Selection for the following November 1 through October 31 period (PGA Year). All requests must be received by the Company on or before June 30, and will be effective the following November 1. Except as identified in this Rate Schedule under "OUT-OF-CYCLE TRANSFERS," a Customer may not make a change to their Service Type Selection at any other time.

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(C)

This Annual Service Election Provision shall apply to Customer-requested changes to any or all of the following components of a Service Type Selection: (1) Service Type, (2) Commodity Component (Sales Service Types only); (3) Pipeline Capacity Charge billing option (Firm Sales Service Type only), or (4) Firm Sales Service daily delivery volumes (Combination Service Type only).

When there is no Customer requested change under this Annual Service Election provision, then for the next PGA Year commencing November 1 the Customer's Service Type and related billing options, including the Commodity Component option for Sales Service Types, will default to the same Service Type and billing options that are in effect at the close of the current Annual Service Election period.

Transfers between Sales Service and Transportation Service are further subject to the provisions in this Rate Schedule under "APPLICATION OF TEMPORARY ADJUSTMENTS TO RATES (ACCOUNT 191 ADJUSTMENTS)."

The Service Types available under this Rate Schedule, and the required selections for each Service Type, are set forth below. See "DESCRIPTION OF SERVICE TYPES AND REQUIREMENTS FOR SERVICE" in this Rate Schedule for additional information:

Sales Service Type*:

Customer must select one of two Commodity Component options: (1) Annual Sales WACOG, or (2) Winter Sales WACOG. Customer will have until August 15 to select the Winter Sales WACOG option (for a term of November 1 through March 31). If no selection is made, the Commodity Component option will default to Annual Sales WACOG. The Customer that selects Winter Sales WACOG will be billed at Monthly Incremental Cost of Gas (Schedule 150) effective April 1 through October 31. If no other change in Service Type was previously requested, either as an Out-of-Cycle Transfer or with this Annual Service Election, the Winter Sales WACOG Commodity Component will automatically restart for billing effective the following November 1 through March 31 period.

Firm Sales Service:

Customer must select one of two Pipeline Capacity Charge options:

- Volumetric
- MDDV

(continue to Sheet 32-3)

RATE SCHEDULE 32
LARGE VOLUME NON-RESIDENTIAL SALES AND TRANSPORTATION SERVICE
(continued)

ANNUAL SERVICE ELECTION – June 30 Election for November 1 Service: (continued)
Sales Service Type* (continued):

(C)

Interruptible Sales Service *

Transportation Service Types*:

- a. Firm Transportation Service
- b. Interruptible Transportation Service

*Customer will automatically be placed on a month-end billing cycle.

Combination Service Types*:

For Sales Service, Customer must select one of two Commodity Component options: (1) Annual Sales WACOG, or (2) Winter Sales WACOG. Customer will have until August 15 to select the Winter Sales WACOG option (for a term of November 1 through March 31). If no selection is made, the Commodity Component option will default to Annual Sales WACOG (November 1 through October 31). The Customer that selects Winter Sales WACOG will be billed at Monthly Incremental Cost of Gas (Schedule 150) effective April 1 through October 31. If no other change in Service Type was previously requested, either as an Out-of-Cycle Transfer or with this Annual Service Election, the Winter Sales WACOG Commodity Component will automatically restart for billing the following November 1 through March 31 period.

- a. Firm Sales Service with Interruptible Sales Service **
Customer must specify an exact daily delivery volume to be billed at Firm Sales Service
- b. Firm Sales Service with Firm Transportation Service
Customer must specify an exact daily delivery volume to be billed at Firm Sales Service
- c. Firm Sales Service with Interruptible Transportation Service
Customer must specify an exact daily delivery volume to be billed at Firm Sales Service
- d. Interruptible Sales with Interruptible Transportation Service
Customer must specify an exact daily delivery volume to be billed at Interruptible Sales Service
- e. Firm Transportation Service with Interruptible Transportation Service
Customer must specify an exact daily delivery volume to be billed at Firm Transportation Service

* Customer will automatically be placed on a month-end billing cycle

*** Customer must choose one Commodity Component option for all Sales Service volumes

Customer may specify an hourly delivery volume in their Service Election form. The total hourly delivery volume for any given 24-hour period must not exceed the total specified Firm MDDV.

The terms and conditions for submission and approval of a Service Type Selection are identified under "SERVICE TYPE SELECTIONS – PROCESS AND PROCEDURE" of this rate schedule. A Customer need not submit a Service Election Form if the Customer desires to retain its current Service Type Selection for the next PGA Year.

RATE SCHEDULE TRANSFERS:

A transfer between Rate Schedules will be allowed upon one Billing Month advance notice to the Company. Any request to also change the Service Type Selection must comply with the provision for "OUT-OF-CYCLE TRANSFERS FOR CERTAIN SERVICE TYPES" set forth in this Rate Schedule. Customer eligibility for a Rate Schedule transfer is as follows:

New Customer. A Customer with an account for gas service to the premise to be served by this Rate Schedule that was opened within the most recent 12 calendar months may transfer to any other Rate Schedule upon appropriate advance notice. Once a transfer is made, a second transfer cannot be made from that Rate Schedule until Customer has completed a minimum of 12 consecutive Billing Months.

(continue to Sheet 32-4)