

July 31, 2023

NWN OPUC Advice No. 23-12 / UG 479
(UM 2123)**VIA ELECTRONIC FILING**

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

**Re: REQUEST FOR AMORTIZATION OF CERTAIN NON-GAS COST DEFERRED
ACCOUNTS RELATING TO: UM 2123 – Net Curtailment and Entitlement Revenues**

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith revisions and additions to its Tariff, P.U.C. Or. 25,¹ stated to become effective with service on and after November 1, 2023, as follows:

Third Revision of Sheet 168-1	Schedule 168	Temporary Rate Adjustment – Net Curtailment and Entitlement Revenues
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Purpose

The purpose of this filing is to request amortization of amounts deferred under docket UM 2123 Net Curtailment and Entitlement Revenues for inclusion in rates effective November 1, 2023. The Company last adjusted rates for this purpose effective November 1, 2022.

Background:

This filing is in compliance with ORS 757.259, which authorizes deferred utility expenses or revenues to be allowed (amortized) in rates to the extent authorized by the Public Utility Commission of Oregon (Commission) in a proceeding to change rates. All of the deferrals included in this filing occurred with appropriate application by Commission authorization, as rate orders or under approved tariffs.

As part of the Comprehensive Stipulation adopted by the Commission in Order No. 20-364 in docket UG 388, NW Natural will defer any net curtailment and entitlement revenues with amortization of net deferral balances through Schedule 168. The deferral supporting this treatment was approved in docket UM 2123.

Proposed Changes

The net effect of removing the temporary adjustment applied to rates effective November 1, 2022, and the application of the new temporary adjustment is to decrease the Company's annual revenues by \$706,412, or 0.08%.

¹ Tariff P.U.C. Or. 25 originated November 1, 2012 with docket UG 221; Order No. 12-408 as supplemented by Order No.12-437, and was filed in accordance with ORS 767.205 and OAR 860-022-0005.

The monthly bill of the average residential customer served under Rate Schedule 2 using 56 therms will decrease \$0.06. The monthly decrease for the average industrial Rate Schedule 3 customer using about 1,304 therms is \$0.83, the average industrial Rate Schedule 31 firm sales customer using 5,776 therms will see a monthly decrease of about \$2.28, and the average industrial Rate Schedule 32 firm sales customer using about 18,823 therms will see a monthly decrease of about \$4.16.

In compliance with OAR 860-022-0025 the Company states that the number of customers affected by the proposed change in this filing is 636,785 residential customers, 61,857 commercial customers, and 601 industrial customers.

In support of this filing, the Company includes supporting materials as part of this filing and will separately submit work papers in electronic format, all of which are incorporated herein by reference.

Conclusion

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

Please address correspondence on this matter to Lora Bourdo at lora.bourdo@nwnatural.com with copies to the following:

eFiling
Rates & Regulatory Affairs
NW Natural
250 SW Taylor Street
Portland, Oregon 97204
Fax: (503) 220-2579
Telephone: (503) 610-7330
eFiling@nwnatural.com

Sincerely,

NW NATURAL

/s/ Kyle Walker, CPA

Kyle Walker, CPA
Rates/Regulatory Senior Manager

Attachment: Exhibit A – Supporting Materials

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Third Revision of Sheet 168-1
Cancels Second Revision of Sheet 168-1

SCHEDULE 168 TEMPORARY RATE ADJUSTMENT – NET CURTAILMENT AND ENTITLEMENT REVENUES

PURPOSE:

To credit Firm Sales Service Customers served under the below-listed Rate Schedules for the Oregon share of curtailment and entitlement revenues received by NW Natural net of incremental costs related to curtailment and entitlement orders as adopted by Commission Order No. 20-364 in Docket UG 388 entered on October 16, 2020.

APPLICABLE:

To Firm Sales Service Customers on the Rate Schedules of this Tariff listed below:

Rate Schedule 2	Rate Schedule 31
Rate Schedule 3	Rate Schedule 32
Rate Schedule 27	

APPLICATION TO RATE SCHEDULES:

The adjustment amount shown below is included in the Temporary Adjustments reflected in the above-listed Rate Schedules. NO ADDITIONAL ADJUSTMENT TO RATES IS REQUIRED.

Effective November 1, 2023

Schedule	Block	Total Adjustment
2		(\$0.00143)
3 CSF		(\$0.00107)
3 ISF		(\$0.00078)
27		(\$0.00117)
31 CSF	Block 1	(\$0.00074)
	Block 2	(\$0.00067)
31 ISF	Block 1	(\$0.00051)
	Block 2	(\$0.00046)
32 CSF	Block 1	(\$0.00046)
	Block 2	(\$0.00039)
	Block 3	(\$0.00027)
	Block 4	(\$0.00015)
	Block 5	(\$0.00007)
	Block 6	(\$0.00003)
32 ISF	Block 1	(\$0.00030)
	Block 2	(\$0.00025)
	Block 3	(\$0.00017)
	Block 4	(\$0.00010)
	Block 5	(\$0.00005)
	Block 6	(\$0.00002)

(C)

(R)

(R)

GENERAL TERMS:

This Schedule is governed by the terms of this Schedule, the General Rules and Regulations contained in this Tariff, any other Schedules that by their terms or by the terms of this Schedule apply to service under this Schedule, and by all rules and regulations prescribed by regulatory authorities, as amended from time to time.

Issued July 31, 2023
NWN OPUC Advice No. 23-12

Effective with service on
and after November 1, 2023

EXHIBIT A

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

NW NATURAL SUPPORTING MATERIALS

Non-Gas Cost Deferral Amortizations
Net Curtailment and Entitlement Revenues

UM 2123

NWN OPUC Advice No. 23-12 / UG 479

July 31, 2023

NW NATURAL

EXHIBIT A

Supporting Materials

Non-Gas Cost Deferral Amortizations Net Curtailment and Entitlement Revenues

NWN OPUC ADVICE NO. 23-12 / UG 479

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Basis for Revenue Related Costs	3
PGA Effects on Revenue	4
Summary of Deferred Accounts Included in the PGA	5
232060 Oregon Curtailment and Entitlement Revenue Deferral	6
232065 Curtailment and Entitlement Revenue Amortization	7

NW Natural
Rates and Regulatory Affairs
2023-2024 PGA Filing - OREGON
Basis for Revenue Related Costs

	Twelve Months <u>Ended 06/30/23</u>	
1		
2		
3	\$ 977,383,649	
4	\$ 981,971,599	
5		
6	n/a	0.430% Statutory rate
7	\$ 22,573,887	2.299% Line 7 ÷ Line 4
8	<u>\$ 881,388</u>	<u>0.090% Line 8 ÷ Line 4</u>
9		
10		<u>2.819%</u> Sum lines 8-9
11		
12		

13 **Note:**

- 14 [1] Dollar figure is set at statutory level of 0.275% times Total Oregon Revenues (line 4).
 15 Because the fee changed since our last general rate case, the difference between the previous fee of 0.375%
 16 and the new fee of 0.430%, as it affects our base rates, is being captured as a temporary deferral.
 17 [2] Represents the normalized net write-offs based on a three-year average.

NW Natural
 Rates & Regulatory Affairs
 2023-2024 PGA Filing - June Filing
 Summary of Deferred Accounts Included in the PGA

Account	Balance 6/30/2023	Jul-Oct Estimated Activity	Jul-Oct Interest	Estimated Balance 10/31/2023	Interest Rate During Amortization	Estimated Interest During Amortization	Total Estimated Amount for (Refund) or Collection	Amounts Excluded from PGA Filing	Amounts Included in PGA Filing
A	B	C	D	E	F1	F2	G	H	I
				E = sum B thru D	5.13%		G = E + F2		Excl. Rev Sens
Miscellaneous Amortizations									
232060 CURTAILMENT & ENTITLEMENT DEFERRAL	(796,352)	0	(18,302)	(814,654)					
232065 CURTAILMENT & ENTITLEMENT AMORTIZATION	(12,510)	20,754	(26)	8,218					
Total	(808,862)	20,754	(18,328)	(806,436)	5.13%	(22,584)	(829,020)		(829,020)

Company: Northwest Natural Gas Company
 State: Oregon
 Description: OR Curtailment & Entitlement Revenue Deferral
 Account Number: 232060
 Docket: Docket UG 388 Order No. 20-364

1	Debit (Credit)							
2	Month/Year	Note	Deferral	Transfers	Interest Rate	Interest	Activity	Balance
3	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
4								
5	Beginning Balance							
26	Jul-22		(1,664.97)		6.965%	(859.61)	(2,524.58)	(149,795.09)
27	Aug-22		0.00		6.965%	(869.44)	(869.44)	(150,664.53)
28	Sep-22		0.00		6.965%	(874.48)	(874.48)	(151,539.01)
29	Oct-22		(199.34)		6.965%	(880.14)	(1,079.48)	(152,618.49)
30	Nov-22	1	(9,064.45)	141,525.07	6.836%	(89.01)	132,371.61	(20,246.88)
31	Dec-22		(549,801.46)		6.836%	(1,681.36)	(551,482.82)	(571,729.70)
32	Jan-23		21,540.00		6.836%	(3,195.60)	18,344.40	(553,385.30)
33	Feb-23		(216,576.94)		6.836%	(3,769.33)	(220,346.27)	(773,731.58)
34	Mar-23		(1,275.26)		6.836%	(4,411.32)	(5,686.58)	(779,418.15)
35	Apr-23		(1,588.96)		6.836%	(4,444.61)	(6,033.57)	(785,451.72)
36	May-23		(1,910.00)		6.836%	(4,479.90)	(6,389.90)	(791,841.62)
37	Jun-23		-		6.836%	(4,510.86)	(4,510.86)	(796,352.48)
38	Jul-23				6.836%	(4,536.55)	(4,536.55)	(800,889.03)
39	Aug-23				6.836%	(4,562.40)	(4,562.40)	(805,451.43)
40	Sep-23				6.836%	(4,588.39)	(4,588.39)	(810,039.82)
41	Oct-23				6.836%	(4,614.53)	(4,614.53)	(814,654.35)

42
 43 **History truncated for ease of viewing**

44
 45 **NOTES**

46 **1** -Transferred June balance plus July-October interest on June balance to account 232065 for amortization.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of Curtailment/Entitlement
 Account Number: 232065
 Docket: Docket UG 388 and UG 453
 Amortization of 2021-22 deferral approved in Order No. 22-403

1	Debit (Credit)							
2								
3	Month/Year	Note	Amortization	Transfers	Interest Rate	Interest	Activity	Balance
4	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
5	Beginning Balance							
18	Nov-22	Old rates	11,987.17		1.24%	(7.45)	11,979.72	(1,222.84)
19	Nov-22	New rates (1)	7,635.32	(141,525.07)	1.82%	(208.86)	(134,098.61)	(135,321.45)
20	Dec-22		24,899.58		1.82%	(186.36)	24,713.22	(110,608.23)
21	Jan-23		24,062.85		1.82%	(149.51)	23,913.34	(86,694.89)
22	Feb-23		22,411.87		1.82%	(114.49)	22,297.38	(64,397.51)
23	Mar-23		21,918.21		1.82%	(81.05)	21,837.16	(42,560.35)
24	Apr-23		16,792.37		1.82%	(51.82)	16,740.55	(25,819.80)
25	May-23		8,713.57		1.82%	(32.55)	8,681.02	(17,138.78)
25	Jun-23		4,651.49		1.82%	(22.47)	4,629.02	(12,509.76)
25	Jul-23	<i>forecasted</i>	<i>3,710.30</i>		1.82%	(16.16)	3,694.14	(8,815.62)
25	Aug-23	<i>forecasted</i>	<i>3,696.03</i>		1.82%	(10.57)	3,685.46	(5,130.16)
27	Sep-23	<i>forecasted</i>	<i>3,988.30</i>		1.82%	(4.76)	3,983.54	(1,146.62)
28	Oct-23	<i>forecasted</i>	<i>9,359.22</i>		1.82%	5.36	9,364.58	8,217.96

28 **History truncated for ease of viewing**

28 **NOTES**

31 **1** - Transferred in authorized balance from account 232065 Curtailment & Entitlement Deferral for amortization.