

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: January 23, 2024**

**REGULAR**  **CONSENT**  **EFFECTIVE DATE** February 1, 2024

**DATE:** January 9, 2024

**TO:** Public Utility Commission

**FROM:** David Abraham

**THROUGH:** Bryan Conway, Marc Hellman, and Anna Kim **SIGNED**

**SUBJECT:** NORTHWEST NATURAL:  
(Docket No. ADV 1581/Advice No. 23-28)  
Updates Schedule 185 – Special Annual Interstate and Intrastate Storage and Transportation Credit and Schedule 186 – Special Annual Core Pipeline Capacity Optimization Credit.

**STAFF RECOMMENDATION:**

Staff recommends the Oregon Public Utility Commission (OPUC or Commission) approve Northwest Natural Gas Company’s (NW Natural or Company) Advice No. 23-28, which updates Schedule 185 and Schedule 186 to reflect the per-therm credit calculation for a lump sum credit payment to customers served under Rate Schedules 2 and 3, and under the Sales Service option of Schedules 31 and 32, respectively, effective for service on and after February 1, 2024.

**DISCUSSION:**

Issue

Whether the Commission should approve NW Natural’s proposal to revise its Schedule 185 and Schedule 186 to return funds to customers served under Rate Schedules 2 and 3, and under the Sales Service option of Schedules 31 and 32, as a lump sum beginning February 1, 2024.

Applicable Law

ORS 757.205 requires public utilities to file schedules showing all rates, tolls, and charges for service that have been established and are in force at the time.

ORS 757.210 (1)(a) states a utility must show that a proposed rate or schedule of rates is fair, just, and reasonable. The Commission may authorize a rate or schedule of rates only if it is deemed to be fair, just, and reasonable.

ORS 757.220 and OAR 860-022-0015 state that energy utilities must provide the Commission with at least 30 days' notice prior to the effective date for any change in rates, tolls, charges, rules, or regulations.

OAR 860-022-0005 defines the required formatting all large energy utilities must use when making tariff submissions to the Commission.

OAR 860-022-0025 illustrates energy utility requirements for filing tariffs or changes to rate schedules.

## Analysis

### *Background*

On December 15, 2023, the Company filed Advice No. 23-28 requesting revisions to Schedule 185 and Schedule 186. The Company proposes to credit customers based on Oregon's share of revenue received by the Company for: (a) interstate storage and related transportation services provided, b) core storage optimization activities, c) intrastate storage activities under Schedules 80 and 91, and d) optimization of core customer pipeline and storage capacity. In the Company's 2020 rate case, the stipulating parties agreed to change the delivery of this credit, which had historically been provided in June, to February.<sup>1</sup> The lump sum February bill credit will be applied to customer bills commencing with the first billing cycle in February 2024 and ending in the last billing cycle in February 2024. The bill credits will be calculated based on the customer's actual billed gas usage for the period November 1, 2022 through October 31, 2023.

### *Schedule 185 – Special Annual Interstate and Intrastate Storage and Transportation Credit*

NW Natural's proposed Schedule 185 credit represents a refund of the Company's Oregon share of revenues received for interstate storage and related transportation service activities under a Limited Jurisdiction Blanket Certificate granted under FERC Regulations, 18 C.F.R. §294.224.

The 2024 refund total is \$3,891,335 (before revenue sensitive effects) and is comprised of two parts:

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<sup>1</sup> See Order No. 20-364, Section III.A.3.a, page 17 in Docket No. UG 388.

- \$3,855,974 in revenues from November 2022 to October 2023 activity, plus
- \$35,361 from a remaining residual balance from the winter 2023 credits.

For comparison, the 2022 Schedule 185 credit amount of \$3,982,772 approved by the Commission was comprised of:

- \$3,976,265 in revenues from November 2020 through October 2021 activity, plus
- \$6,507 from a remaining residual balance from the February 2021 credits.

The credit amount under Schedule 185 is calculated on an equal percentage of margin basis to reflect rate allocation practices adopted in the Company's general rate case, Docket No. UG 344.<sup>2</sup>

*Schedule 186 - Special Annual Core Pipeline Capacity Optimization Credit*

NW Natural proposes to revise Schedule 186 by applying a per-therm refund credit to customer bills for Oregon's share of revenues received from the Company's core pipeline capacity optimization activities. The Schedule 186 credit applies across all sales-based rate schedules.

The 2024 refund total of \$16,905,283 (before revenue sensitive effects) is comprised of two parts:

- \$16,751,660 in revenues from November 2022 to October 2023 activity, plus
- \$153,623 from a remaining residual balance from the winter 2023 credits.

For comparison, the 2022 Schedule 186 refund amount previously approved by the Commission totaled \$37,494,287 and was comprised of:

- \$37,433,027 in revenues for November 2020 through October 2021 activity, plus
- \$61,260 from a remaining residual balance from the February 2021 credits.

The Schedule 186 credit applies across all sales-based rate schedules and is a credit of \$0.02281 per-therm.

*Effects of Filing*

The combined effects of the customer credits proposed under Schedule 185 and Schedule 186 results in a refund of \$20,796,618 (before revenue sensitive effects), which is comprised of \$20,607,634 from storage, transportation, and optimization

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<sup>2</sup> See Order No. 18-419 at 11.

revenues generated November 1, 2022 to October 31, 2023, plus a residual remaining balance of \$188,984 from the winter 2023 credits.

The average monthly bill effects of the combined 2024 Schedule 185 and Schedule 186 credits for the February time period are as follows:

- The average Schedule 2 Residential customer that used approximately 648 therms will see a monthly bill credit of approximately \$19.27.
- The average Schedule 3 Commercial customer that used approximately 3,330 therms will see a monthly bill credit of approximately \$92.91.
- The average Schedule 31 Commercial Firm Sales customer that used approximately 35,947 therms will see a monthly bill credit of approximately \$935.24.
- The average Schedule 32 Industrial Firm Sales customer that used approximately 242,821 therms will see a monthly bill credit of approximately \$5,664.63.
- The average Schedule 32 Industrial interruptible Sales customer will see a monthly bill credit of approximately \$13,395.30.

Staff reviewed the Company's workpapers used to calculate the proposed incremental rate changes to Schedule 185 and Schedule 186. Staff finds the calculations used to prepare this filing to be accurate and consistent. Staff notes that the dollar amounts from Schedules 185 and 186 that will be credited to customers are not the result of over-collections. Instead, these dollar amounts result from NW Natural's efforts to maximize the use of existing pipeline and storage capacity resources when these resources are not needed to serve NW Natural's customer load requirements.

### Conclusion

Based on Staff's analysis of NW Natural's application and the workpapers associated with the filing, Staff finds the proposed revisions to tariffs under Schedule 185 and Schedule 186 result in rates that are fair, just, and reasonable. Staff recommends the Commission approve NW Natural's filing.

### **PROPOSED COMMISSION MOTION:**

Approve NW Natural's Advice No. 23-28, which updates Schedule 185 and Schedule 186, respectively, to reflect a per-therm calculation for a lump sum credit payment to customers served under Rate Schedules 2 and 3, and under the Sales Service option of Schedules 31 and 32, effective for service on and after February 1, 2024.

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