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Portland, OR 97204

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nwnatural.com

February 9, 2024

NWN OPUC Advice No. 24-01

**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 80 – Firm Storage 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 20, 2024.

Third Revision of Sheet 80-6	Schedule 80	Firm Storage Service (continued)
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**Purpose**

The purpose of this filing is to update the rates for Schedule 80 service to reflect changes in rates approved by FERC resulting from the Company's most recent Mist Interstate Storage Rate Petition filed on August 25, 2023. The Company revises rates for this purpose approximately every five years; the last filing was effective November 1, 2018.

**Background**

The Firm Storage Service offered under Schedule 80 is provided by NW Natural using the Mist underground natural gas storage facility (Mist), a facility owned and operated by the company near Mist, Oregon. In addition to using the storage facility for its retail customers, the Company has pre-built storage in advance of core need and uses that excess capacity to provide storage services to customer in the interstate and intrastate market.

The Firm Storage Service provided under Schedule 80 consists of a bundled storage and transportation service of customer-owned gas subject to interruption by NW Natural due to force majeure. All gas stored under Schedule 80 must be consumed by a customer capable of receiving the service from Mist within the Company's Oregon service territory.

The Federal Energy Regulatory Commission (FERC) regulates interstate storage services, using a maximum cost of service model where gas storage prices may be at or below the cost of service as approved by the FERC in their last regulatory filing. NW Natural filed its most recent Mist Interstate Storage Rate Petition with FERC on August 25, 2023. The petition was automatically deemed effective under the FERC's Optional Notice Procedure regulations.

The next FERC rate update is required to take place on or before November 1, 2028.

**Proposed Changes**

NW Natural proposes to reflect in Schedule 80 the updated rates as approved by FERC in docket PR23-65-000. These rates reflect the Company's updated cost of operating Mist.

Please see the table below for details of the changes (note that there are no customers on this schedule, thus average bill impacts are not known):

	<b>Current Schedule 80 Rate</b>	<b>Updated FERC- Approved Rate</b>
Maximum Authorized Overrun Charge	\$0.1527	\$0.1993
Fuel Charge	2.1%	2.19%
<b>Firm Storage and Transmission Service</b>		
Maximum Monthly Deliverability Reservation Charge	\$4.6445	\$6.0623
Maximum Monthly Capacity Charges	\$0.0562	\$0.0881
<b>Modified Firm Storage and Transmission Service</b>		
Maximum Monthly Deliverability Reservation Charge	N/A	\$5.4600
Maximum Monthly Capacity Charges	N/A	\$0.0881

**Conclusion**

NW Natural respectfully requests that the Commission approve the proposed revisions of the enclosed tariff sheet to become effective with service on and after March 20, 2024.

In compliance with OAR 860-022-0025 and OAR 860-022-0030, NW Natural states that the tariff changes proposed in this filing will affect those customers that choose to take service under Schedule 80; there are no customers taking service under Schedule 80 at this time. There is no impact on the Company's revenue as a result of this filing.

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](http://www.nwnatural.com).

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

eFiling  
NW Natural  
250 SW Taylor Street  
Portland, Oregon 97204  
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Sincerely,

NW NATURAL

*/s/ Amy Schulties*

Amy Schulties  
Regulatory Consultant, Regulatory Affairs  
NW Natural  
250 SW Taylor Street  
Portland, OR 97204  
(503) 610-7546

# NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Third Revision of Sheet 80-6  
Cancels Second Revision of Sheet 80-6

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## RATE SCHEDULE 80 FIRM STORAGE SERVICE (continued)

### RATES AND CHARGES:

Effective: September 1, 2023

(C)

#### Firm Storage and Transmission Service

(N)

##### ***Monthly Deliverability Reservation Charge.***

A monthly charge, as set forth in the Service Agreement, shall apply for each Dekatherm (Dth) of Customer's MDWQ. The maximum Monthly Deliverability Reservation Charge is \$6.0623/month and the minimum charge is \$0.

(I)

##### ***Monthly Capacity Charge.***

A monthly charge, as set forth in the Service Agreement, shall apply for each Dth of Customer's MSC. The maximum Monthly Capacity Charge is \$0.0881/month and the minimum charge is \$0.

(I)

#### Modified Firm Storage and Transmission Service

(N)

##### ***Monthly Deliverability Reservation Charge.***

A monthly charge, as set forth in the Service Agreement, shall apply for each Dekatherm (Dth) of Customer's MDWQ. The maximum Monthly Deliverability Reservation Charge is \$5.4600/month and the minimum charge is \$0.

##### ***Monthly Capacity Charge.***

A monthly charge, as set forth in the Service Agreement, shall apply for each Dth of Customer's MSC. The maximum Monthly Capacity Charge is \$0.0881/month and the minimum charge is \$0.

(N)

#### Authorized Overrun Charge.

A charge, as set forth in the Service Agreement, may apply for each Dth of Gas withdrawn in excess of Customer's MDWQ or injected in excess of Customer's MDIQ (Authorized Overrun Quantities) on each Gas Day of a given Month. The maximum charge is \$0.1993 and the minimum charge is \$0.0000.

(I)

#### Fuel Charge.

Customers shall be assessed a 2.19% fuel-in-kind charge for each Dth of gas injected.

(C)

#### Other Applicable Charges.

Any other applicable charges as provided for in the Tariff may be set forth on the Service Agreement or monthly invoice, as appropriate.

#### Service Charge Credit.

If the Company fails to deliver to the designated Storage Delivery Point or receive at the Receipt Point hereunder, other than as may be excused by Force Majeure, ninety-five percent (95%) or more of the aggregate Confirmed Daily Nominations (as hereinafter defined) of all firm intrastate Storage Service Customers for more than twenty-eight (28) Days in any given Contract Year, then for each Gas Day during that Contract Year in excess of twenty-eight (28) Days that the Company so fails to deliver or receive (a "Credit Day"), Customer, as its sole remedy, shall be entitled to a Service Charge Credit calculated as set forth below.

(continue to Sheet 80-7)

Issued February 9, 2024  
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Effective with service on  
and after March 20, 2024