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September 21, 2021

NWN OPUC Advice No. 21-15

**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 320 – Oregon Low-Income Energy Efficiency (OLIEE) Program -  
Housekeeping Filing**

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following housekeeping revisions to its Tariff P.U.C. Or. 25, stated to become effective October 22, 2021.

|                               |              |  |
|-------------------------------|--------------|--|
| Fifth Revision of Sheet 320-4 | Schedule 320 | Oregon Low-Income Energy Efficiency (OLIEE) Programs |
|-------------------------------|--------------|--|

**Purpose**

The purpose of this filing is to make housekeeping revisions to clarify the terms and parameters outlined in Oregon Low-Income Energy Efficiency (OLIEE) Programs (Schedule 320).

**Background**

Schedule 320 describes the OLIEE program, which is funded through a designated portion of Schedule 301, Public Purposes Funding Surcharge. The program is available to income-eligible residential dwellings location within NW Natural’s Oregon service territory.

**Proposed Housekeeping Changes**

In Advice No. 19-19 (ADV 1056), NW Natural proposed, and the Commission approved, tariff revisions to Schedule 320 to allow for clarification and more efficient administration of the OLIEE program. NW Natural has recently become aware of tariff language that was inadvertently left in the tariff but is now outdated since the Advice No. 19-19 changes became effective in 2020. This language should have been removed as part of the changes in Advice No. 19-19 and is detailed as follows.

In the Energy Efficiency Measures section of Sheet 320-4, NW Natural proposes to remove the outdated language relating to payments based on one energy audit. This language is obsolete because Advice No. 19-19 included tariff language changes to remove reference to specific funding amounts for activities such as Audits and Inspections. This language was replaced with “per dwelling” Administrative funding caps. The housekeeping change proposed in this filing to remove the one energy audit language leaves the total Administrative cap per dwelling unchanged – and clear per-dwelling Administrative and project caps remain.

**Conclusion**

NW Natural respectfully requests that the Commission approve this housekeeping tariff change to become effective October 22, 2021.

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:

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Respectfully submitted,

*/s/ Rebecca T. Brown*

Rebecca T. Brown  
Regulatory Consultant

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**SCHEDULE 320**  
**OREGON LOW-INCOME ENERGY EFFICIENCY (OLIEE) PROGRAMS**  
(continued)

**CAP Administration and Delivery Costs**

Each Agency will be reimbursed from the OLIEE Account for administrative costs and direct program costs incurred by them in their administration and delivery of the OLIEE program up to \$1,600 per dwelling. The Agency fee will be paid to each Agency along with the measure rebate payments. The Company will process measure rebate payments and Agency payments within thirty (30) days from the date the Company receives all completed documentation in support of such rebate request(s).

**Annual Program Year Targets (households)**

At the beginning of each Program Year, each participating Agency will be assigned a home completion target that supports the achievement of an annual program target. Agency targets may be adjusted from time to time throughout a Program Year, as necessary. Nothing precludes Agencies from serving more than the annual target of homes in any program year provided sufficient funds are available and approved by the Company. The Company will include the expected targets for the following year, by Agency, in the Annual Report.

**Energy Efficiency Measures**

Qualifying energy efficiency measures are, 1) energy efficiency measures recommended when the dwelling is modeled in the Energy Analyzer Software. All measures prescribed by the Energy Analyzer Software for the whole house must meet or exceed a Savings to Investment Ratio (SIR) of 1.0 or better unless identified through number 2 or 3 below. The SIR calculation will use the Energy Information Administration's Oregon residential natural gas price as the cost against which the benefits are measured 2) The replacement of non-functioning or red-tagged heating equipment with a high efficiency gas furnace. Heating equipment is considered red-tagged when a representative from the Company or an Agency has deemed the appliance unsafe to operate, 3) Measures identified as cost effective by third party organizations (Regional Technical Forum, Energy Trust of Oregon, etc.).

The energy efficiency measure payment may not exceed \$15,000 per dwelling. When only heating equipment measures are performed, the payment may be up to \$5,000 per dwelling. When no heating equipment measures are installed, energy efficiency measure(s) paid per dwelling shall not exceed \$10,000. When both heating equipment and non heating equipment measures are included the payment may not exceed \$15,000 per dwelling. To accommodate timing differences between measure installations, the payment may be disbursed through one or more requests. Under no circumstances will the payment exceed the actual installed cost of the measure(s). The Company may coordinate with other funders (eg Energy Trust of Oregon) to facilitate payments and appropriate reporting of measures. (D)

(continue to Sheet 320-5)