



250 SW Taylor Street  
Portland, OR 97204

503-226-4211  
nwnatural.com

June 30, 2020

NWN OPUC Advice No. 20-6

**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 310 – Oregon Low-Income Gas Assistance (OLGA)**

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 on July 29, 2020.

**NW Natural respectfully requests the proposed tariff sheet become effective with less than statutory notice on July 29, 2020; an L.S.N. is also enclosed.**

Second Revision of Sheet 310-1	Schedule 310	Oregon Low-Income Gas Assistance (OLGA)
--------------------------------	--------------	---

**Purpose**

The purpose of this filing is to modify language in Schedule 310, Oregon Low-Income Gas Assistance (OLGA) to enable the use of categorical eligibility guidelines by community action agencies (agencies) when screening and approving for eligibility for OLGA energy assistance.

The Company seeks to provide agencies more flexibility in determining energy assistance eligibility in order to be immediately responsive to the rapidly changing economic and social conditions facing customers in the wake of the COVID-19 pandemic. The proposed changes are intended to be permanent and continue beyond the current public health crisis. Providing agencies additional flexibility to determine energy assistance eligibility is expected to enable them to qualify more customers for assistance, creating a positive impact for customers now and in the future.

NW Natural respectfully requests these changes become effective on July 29, 2020, with less than statutory notice. As allowed by ORS 757.220, good cause must be shown for requested changes less than 30 days after the request is filed.<sup>1</sup> NW Natural considers this tariff revision to be practical based on the changing social and economic conditions and to be in the best interest of its customers.

---

<sup>1</sup> ORS 757.220 states “the commission, for good cause shown, may allow changes without requiring the 30 days’ notice by filing an order specifying the changes to be made and the time when they shall take effect.”

### **Background**

Unprecedented economic and social impacts associated with the COVID-19 public health emergency continue to affect our customers. Oregon is experiencing record-level unemployment due to the pandemic. Providing customers with flexibility and options when it comes to their energy bills during these challenging times is a priority for the Company.

NW Natural has heard from the agencies through the Community Action Partnership of Oregon (CAPO) that one barrier to expanding the reach of energy assistance is eligibility qualifications. The proposed revisions to our OLGA tariff change the documentation requirements to allow for the use of categorical eligibility. Broad-based categorical eligibility is a policy in which households may become categorically eligible for energy assistance because they qualify for non-cash Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) or Supplemental Security Income (SSI).

In April 2020, CAPO sent a letter to Oregon Housing and Community Services (OHCS) to change documentation requirements to allow the use of categorical eligibility for energy assistance programs. OHCS administers the federal Low Income Home Energy Assistance Program (LIHEAP) and state Oregon Energy Assistance Program (OEAP). The letter was signed by a broad collection of stakeholders, including NW Natural and other utilities. This letter is attached as Appendix A.

NW Natural proposes to apply the policy of categorical eligibility to the OLGA program. The Company administers its OLGA program and the OLGA tariff specifies that agencies have the sole responsibility to screen and approve bill payment assistance applicants for eligibility. Allowing agencies to apply categorical eligibility in the screening process will ease administrative burden for the agencies and expand the reach of energy assistance funding.

### **Proposed Changes**

NW Natural proposes to add language to the OLGA tariff to allow for agencies to use categorical eligibility when qualifying their clients for energy assistance from the OLGA program. If adopted, customers that already qualify for SNAP, TANF, WIC or SSI will automatically qualify for OLGA assistance.

### **Conclusion**

NW Natural respectfully requests that the Commission approve this tariff change to become effective with less than statutory notice on July 29, 2020.

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

Public Utility Commission of Oregon  
NWN OPUC Advice No. 20-6  
June 30, 2020; Page 3

Respectfully submitted,

*/s/ Natasha Siores*

Natasha Siores  
Manager, Regulatory Compliance  
NW Natural  
250 SW Taylor Street  
Portland, Oregon 97204  
503-610-7074  
natasha.siores@nwnatural.com

# NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Second Revision of Sheet 310-1  
Cancels First Revision of Sheet 310-1

---

## SCHEDULE 310 OREGON LOW-INCOME GAS ASSISTANCE (OLGA)

### PURPOSE:

To describe the program within which that portion of the funds collected and designated for use for low-income bill payment assistance activities under **Schedule 301** "Public Purposes Funding Surcharge" will be administered and delivered to eligible customers. This program is filed pursuant to ORS 757.315.

### APPLICABLE:

To Residential Customers taking service under **Rate Schedule 2** of this Tariff.

### SPECIAL CONDITIONS:

1. Funds collected under **Schedule 301** will be disbursed from the OLGA Account directly to individual customer utility accounts based on electronic vouchers received from each participating Community Action Agency ("Agency").
2. All funds collected under this program will be distributed only to income-eligible Residential Customers of NW Natural. Funds distribution will be accomplished using a cashless voucher system. The cashless voucher system will allow the transfer of authorized payments to an individual customer's utility account from the OLGA program account based on an electronic voucher list submitted to the company by each participating Agency. The Company will process vouchers as soon as possible following receipt. In the event the Company receives a voucher authorization for a single customer from two or more agencies, the Company will process only one voucher authorization.
3. In order to participate in the OLGA program, an Agency must be a legal entity, contracting or subcontracting with the State of Oregon, Department of Housing and Community Services (OHCS), which is eligible to administer funding under the Federal Low Income Home Energy Assistance Program (LIHEAP).
4. Each participating Agency will have sole responsibility to screen and approve bill payment assistance applicants for eligibility. Except where funds are specifically authorized by the Company for customized bill payment assistance plans, which may be available from time to time, each Agency shall follow the established protocols for the qualification of and disbursement to eligible participants in accordance with the guidelines promulgated by OHCS and Oregon Energy Assistance Program (OEAP) or agencies may separately choose to make eligible for assistance any household of which at least one member is a recipient of Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), and benefits under the Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps), and subsequent amendments, as outlined in the OHCS Omnibus Contract. Agencies will document enrollment into adjacent poverty programs in client files. As an alternative to providing identification as required in LIHEAP guidelines, bill payment assistance applicants may qualify by providing the identification required for residential service as described in accordance with the provision of General Rule 2 of this Tariff. The amount of assistance from OLGA for eligible participants shall be based on the LIHEAP Poverty Guidelines and Payment Matrix from the OHCS Operations Manual for these programs. Except where different allocations may be allowed under any special program that may be offered during a program year, any voucher authorizations received by the Company that exceed these guidelines will be appropriately adjusted.

(N)(D)  
(N)(D)

(N)

(T)

(continue to Sheet 310-2)

Issued June 30, 2020  
NWN OPUC Advice No. 20-6

Effective with service on  
and after July 29, 2020

# LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at [puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us).

## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF  Northwest Natural Gas Company _____ (UTILITY COMPANY)  TO WAIVE STATUTORY NOTICE.	) ) ) )	UTILITY L.S.N. APPLICATION  NO. _____ (LEAVE BLANK)
--	------------------	--

**NOTE:** ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.

1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)

Second Revision of Sheet 310-1 - Schedule 310 - Oregon Low-Income Gas Assistance (OLGA). Changes reflect the proposed language to enable the use of categorical eligibility guidelines by community action agencies when screening and approving for OLGA energy assistance.

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)

First Revision of Sheet 310-1

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)

Second Revision of Sheet 310-1

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:

The Company seeks changes to enable the use of categorical eligibility guidelines by community aciton agencies when screen and approving for OLGA energy assistance with less than statutory notice in order to be immediately responsive to the changing economic and social conditions facing customers in the wake of the COVID-19 pandemic. NW Natural considers this tariff revision to be practical based on these changing conditions and to be in the best interest of its customers.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): July 29, 2020

. AUTHORIZED SIGNATURE <i>/s/ Natasha Siores</i>	TITLE Manager, Regulatory Compliance	DATE June 30, 2020
PUC USE ONLY		
<input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE	
AUTHORIZED SIGNATURE	DATE	