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August 19, 2015

NWN OPUC Advice No. 15-13 / ADV \_\_\_\_\_

**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: Schedule 310: Bill Payment Assistance Identification Requirement and LIHEAP Reference Correction

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following revision to its Tariff P.U.C. Or. 25 stated to become effective with service on and after **October 1, 2015**:

First Revision of Sheet 310-1,  
Schedule 310,  
"Oregon Low-Income Gas Assistance (OLGA)."

The first purpose of this filing is to revise Sheet 310-1 of the Company's Tariff Schedule 310 to expand the allowable identification required by the Company to determine eligibility for bill payment assistance applicants. The proposed revision to Sheet 310-1 eases an administrative issue behind qualifying for bill payment assistance as not all applicants have or are willing to provide their social security number to qualify. NW Natural appreciates the Oregon Public Utility Commission Staff's support of the efforts of the Community Action Partnership of Oregon and NW Natural's Oregon Low-Income Gas Assistance program. Providing an alternative to requiring a social security number will further support the success of the bill payment assistance program by removing a barrier which currently deters eligible participants from accessing the program.

The second purpose of this filing is to correct the Low Income Home Energy Assistance Program (LIHEAP) references on Sheet 310-1. Previously the reference excluded the word "Home."

The Company respectfully requests that the tariff sheet filed herein be approved to become effective with service on and after October 1, 2015.

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).

The Company waives paper service in this proceeding.

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

eFiling  
NW Natural Rates & Regulatory Affairs  
220 NW Second Avenue  
Portland, Oregon 97209  
Telecopier: (503) 721-2516  
eFiling@nwnatural.com

Sincerely,

NW NATURAL

*/s/ Gail A. Hammer*

Gail A. Hammer  
Rates & Regulatory Affairs

attachment

**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). (T)  
(T)
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 the Low-Income Home Energy Assistance Act of 1981 and subsequent amendments, as outlined in the OHCS Omnibus Contract. 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 LIHEAP and 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. (T)  
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(continue to Sheet 310-2)

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