

July 1, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: Advice No. 22-02/ADV 1390—NW Natural Reply Comments

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), provides the following comments in response to workshop discussions and stakeholders' written comments in the above-referenced docket. NW Natural appreciates the thoughtful, in-depth feedback provided by all stakeholders, as well as the collaborative spirit displayed throughout this process. In these comments, the Company responds to feedback and comments from the Oregon Citizens' Utility Board (CUB), the Community Energy Project (CEP)¹, Community Action Partnership of Oregon (CAPO), and the Staff of the Public Utility Commission of Oregon (Staff).

As stated in its original filing in this docket, the Company is pleased to have had the opportunity to work with stakeholders to find improvements and efficiencies that can be applied to NW Natural's original bill discount program proposal. As a result of the written comments and numerous discussions held in this proceeding, NW Natural proposes to modify its bill discount program proposal as follows:

- Addition of a Tier 0 with income eligibility from 0-15% State Median Income (SMI) providing a 40% bill discount.
- Clarification that post-enrollment verification is not mandatory and participants who have been auto enrolled will not be subject to the audit process.
- Recognition that the Company may go live with the bill discount program as soon as adequate operational processes have been tested and are in place – as early as October 1, 2022, but no later than November 1, 2022, which was the original go-live date.

Please see attached draft revised tariff Schedule 330 that reflects these changes and has been redlined to the original draft filed in this docket. Following any feedback from the July 5, 2022, workshop, NW Natural will file the finalized proposed tariff pages before the July 12, 2022, public meeting.

The Company provides additional discussion and responses to stakeholder feedback as follows.

¹ CEP filed comments on May 27, 2022, on behalf of joint advocates that included NW Energy Coalition, Green Energy Institute at Lewis & Clark Law School, Rogue Climate, Climate Solutions, African American Alliance for Homeownership, Verde and Coalition of Communities of Color; and comments on June 22, 2022, on behalf of joint advocates that included CAPO and NW Energy Coalition.

Eligibility

The proposed bill discount program's entry level of income eligibility is 60% SMI. We appreciate the comments and feedback from stakeholders in consideration of adequate income eligibility thresholds. NW Natural agrees that there is more to learn about how to establish adequate thresholds through the results of its low-income needs assessment (LINA), Staff's HB 2475 investigation in docket UM 2211, and from the data from the bill discount program itself. NW Natural continues to propose the entry level of eligibility at 60% SMI, as this is consistent with current Oregon energy assistance programs and will enable the Company to auto-enroll participants into the bill discount program.

Enrollment

Stakeholders have underscored the importance of third-party enrollment access via an online tool. We acknowledge this recommendation and recognize the efficiency gains it holds. While we are unable to accommodate the request currently, we offer an alternative solution of auto enrollment that achieves similar efficiencies and helps to streamline access and enrollments. As previewed in our initial filing, NW Natural is in active conversations with Oregon Housing and Community Services (OHCS) to review modifications to the application form community action partner agencies (CAP agencies) use that would enable the ability for the successful and secure transmission of client information from CAP agencies to NW Natural. Once CAP agencies are able to share client data on household income and size with NW Natural, we can make eligibility determinations and automatically enroll eligible customers in the bill discount program. This approach also eases the burden on CAP agencies to conduct enrollments.

NW Natural is in the midst of a complex and far-reaching series of information and technology services (IT&S) and security modernization projects that make it difficult for the Company to commit the resources needed to develop an online tool or web portal in the near-term and offers the above as an alternative solution.

Post-enrollment verification

NW Natural has also heard thoughtful and collaborative feedback regarding bill discount program participants having a risk-free enrollment opportunity without audits or bill-backs. The Company seeks to balance the desire to reduce barriers to low-income customers and avoid any hardship that can be caused through an income verification processes, with our responsibility to our customers in how ratepayer dollars are spent. Our goal is to make access as frictionless as possible while maintaining the integrity of the bill discount program. To this end, NW Natural clarifies that post-enrollment will exclude customers prequalified for participation such as those who were auto enrolled or referred from CAP agencies. This reflects the intent that non-auto-enrolled participants may be randomly selected for an audit, and bill-backs may be applied.

The Company believes that enabling the program to have both an audit and bill-back capability will, by itself, provide a meaningful deterrent to anyone seeking to improperly take advantage of the program.

As discussed in workshops and as proposed by CAPO in its written comments, NW Natural plans to work with CAP agencies to both conduct the audits and to reduce customer burden as much as possible by taking into account sensitivities that the CAP agencies are familiar with addressing. Compensation and contract terms for these audits will be determined with CAP agencies after the bill discount program goes live.

Auto-enrollment

NW Natural reiterates its initial filing and comments made in workshops that customers who have recently received energy assistance and/or participate in NW Natural’s low-income Arrearage Management Program (AMP) will be auto enrolled in the bill discount program when the program goes live. NW Natural estimates the number of auto-enrolled participants on day one will be approximately 14,100. The Company notes that the development of this estimate used more granular data than the original estimate of 7,500 average annual customers participating in Oregon Low Income Gas Assistance (OLGA) only. NW Natural will use the more detailed estimate to update the proposed Schedule 335 rates for the expected cost recovery of the bill discount.

Level of Relief

Discount tiers

NW Natural especially appreciates the robust and collaborative discussions on the discount tiers of the program from the technical workshop, two Staff workshops, as well as another ad-hoc call hosted by the Community Energy Project. As indicated at the beginning of these reply comments, NW Natural is pleased to propose the addition of a fourth tier of discount for those at 0-15% SMI at a discount of 40%. This additional income tier was widely agreed to by those taking part in the discussion, with varying discussion of the discount being 40%-75%. With its current proposal, NW Natural hopes to address the needs of those experiencing the lowest incomes and appreciates the support from stakeholders in arriving at an effective solution.

Comparison with other utilities

The following table provides a comparison of NW Natural’s proposed discount tiers with those proposed and filed by Avista Utilities (Avista) and Cascade Natural Gas Company (Cascade), as well as the tier previewed by Pacific Power. NW Natural’s interim discount proposal is a new program incremental to, and complementary of, existing Company and federal low-income bill assistance programs. To provide an accurate comparison with Avista and Cascade, the average impact of NW Natural’s Oregon Low-Income Gas Assistance (OLGA) Program has been included in the table. As has been discussed in the workshops in this proceeding, Avista and Cascade’s proposals include a comprehensive reorganization of their low-income bill assistance program into a bill discount program along with other features; as a result, a comparison among the gas utilities needs to include for NW Natural both the bill discount program and OLGA. While the Company agrees with stakeholder comments pointing out that the majority of eligible customers do not actually participate in energy assistance programs, when comparing the discounts being offered by the utilities, energy assistance should be included in NW Natural’s comparator to enable an apples-to-apples comparison.

Max income Tier levels	NW Natural Bill Discount	NW Natural OLGA impact	NW Natural Total	Pacific Power Bill Discount	Avista Bill Discount	Cascade Bill Discount
60% SMI	15%	51%	66%	25%	15%	15%
45% SMI	20%	51%	71%	↓	↓	45%
40% SMI	↓	↓	↓	↓	25%	↓
30% SMI	25%	51%	76%	↓	↓	70%
20% SMI	↓	↓	↓	↓	60%	95%
15% SMI	40%	51%	91%	↓	↓	95%
5% SMI	↓	↓	↓	↓	90%	↓

Impact from general rate case

Stakeholders have also requested a comparison of the Company’s proposed bill discount program taking into consideration the pending general rate case in docket UG 435. The following table provides a comparison of the annual as-filed initial rates in UG 435 with the proposed bill discount tiers. An efficiency of the bill discount program is that it automatically provides increasing relief as bills increase, whether due to usage or rate impacts, and provides relief in proportion with the level of need, as lower SMI% will experience a higher bill discount. As shown in the table, annual and monthly bills under the proposed UG 435 rates with the bill discount are lower than a bill with the current rate before the bill discount program, even at the lowest discount tier. In addition, OLGA is still available in addition to LIHEAP to further assist low-income customers.

	Current Rates	Initial filed UG 435 Rates		Current Rates	Initial filed UG 435 Rates
Annual Average Bill	\$758.24	\$847.69	Monthly Average Bill	\$63.19	\$70.64
Annual Bill w Tier 0 discount	\$454.94	\$508.61	Monthly Bill w Tier 0 discount	\$37.91	\$42.38
Annual Bill w Tier 1 discount	\$568.68	\$635.77	Monthly Bill w Tier 1 discount	\$47.39	\$52.98
Annual Bill w Tier 2 discount	\$606.59	\$678.15	Monthly Bill w Tier 2 discount	\$50.55	\$56.51
Annual Bill wTier 3 discount	\$644.51	\$720.54	Monthly Bill wTier 3 discount	\$53.71	\$60.04
OLGA average grant	\$385.00	\$385.00			
LIHEAP average grant	\$319.00	\$319.00			

Low-Income Needs Assessment

As NW Natural has indicated since the inception of the discussions about HB 2475 programs in the fall/winter of 2021, the Company is now in the midst of a low-income needs assessment (LINA) that will be completed by the end of July that will provide valuable information on low-income customers and data that will help in the design of effective programs for those in need. The final report for Oregon is expected to be completed at the end of July 2022.

Applied Economics Group (AEG) is the third-party firm conducting the LINA. The scope of work with AEG requires the compilation of relevant data and summarization of analyses to inform existing and potential new low -income programs. High level workstreams of the scope include:

1. Project Initiation and Ongoing Management
 - a. Project Kick-Off
 - b. Work Plan Development
 - c. Ongoing Project Management
2. Data Collection
 - a. Compile Utility Data
 - b. Secondary Data Collection
 - c. Develop and Administer Customer Survey
3. Analysis
 - a. Data Cleaning and Aggregation
 - b. Community Characterization and Program Eligibility
 - c. Customer Characterization and Participation
 - d. Penetration of Existing Energy Assistance Programs
4. Reporting

Before NW Natural began the request for proposal (RFP) process to find the contractor that would perform the LINA, the Company reached out and asked several stakeholders to help inform the scope of the LINA to be included in the RFP. While not every organization was able to

accommodate staffing bandwidth to meet with NW Natural to discuss the LINA, we were able to meet with CUB, CAPO and a Washington stakeholder, The Energy Project, to gain valuable insight and suggestions.

NW Natural had already begun its LINA process by the time Staff had instituted a schedule requiring HB 2475 programs to be in place in 2022. Due to this timing, NW Natural had to proceed with this interim bill discount proposal before the LINA could be completed and the Company has consistently emphasized the interim nature of the program. As discussed in the Company’s initial filing in this docket, NW Natural intends to review the income tiers and discount percentages when additional information is available from the LINA and Staff’s UM 2211 investigation to identify any changes that would better address customers’ needs. In addition, learnings from the program itself should inform any changes to income tiers and discount percentages. Thus, NW Natural will review the discount tiers with stakeholders before the next heating season, taking into account learnings from the LINA, Staff’s HB UM 2211 investigation, and the experience of the interim program itself. In addition, NW Natural reiterates that these learnings will also inform the low-income program that will be developed with the input of stakeholders. NW Natural will share information from the LINA with stakeholders through a workshop or summary or another means that is amenable to stakeholders.

Several comments call for more information on addressing energy burden. The Company notes that a customer’s gas bill is just one element impacting energy burden. Thus, energy burden involves many factors and information beyond the visibility of NW Natural – information regarding other energy bills, income and other pressures upon customers experiencing energy burden is needed to assess how best to relieve energy burden; we anticipate working with stakeholders in the UM 2211 investigation to achieve a better understanding of energy burden facing Oregonians.

For its part, NW Natural’s interim bill discount program will add to existing energy assistance programs to reduce the Company’s impact on customers’ energy burdens. The following table provides an illustration of the impact of the interim bill discount program on a customer’s annual bill as a percentage of income (using a 3-person household and maximum SMI% income levels) and indicates reduced stress upon household income under the interim bill discount program, and even more so when used in tandem with energy assistance from OLGA.

Tier	SMI %	Bill Discount Percentage	Annual bill discount	Current Bill as a % of income	Bill as a % of income w discount	Bill as % of income w discount and OLGA grant
0	15.0%	40.0%	\$303.34	6.4%	3.8%	0.6%
1	30.0%	25.0%	\$189.59	3.2%	2.4%	0.8%
2	45.0%	20.0%	\$151.67	2.1%	1.7%	0.6%
3	60.0%	15.0%	\$113.75	1.6%	1.4%	0.5%

Both CUB and CAPO offer suggestions for goals of the bill discount program to reduce energy burden to an equitable percentage, and to enroll 80% of eligible customers, respectively. NW Natural notes that these goals require either knowledge of a customer’s energy burden, which, as discussed above, is a complex and difficult metric to attain, or knowledge of the potential universe of NW Natural low-income customers, which is also unknown, but will be addressed in the LINA. As a result, the Company finds that a near-term goal of maximizing participation in the interim bill discount program by monitoring overall participation numbers and participation as a percent of total residential customers is reasonable in the early stages of the program as more is learned about overall energy burden and identifying low-income customers that have not been participating in low-

income programs. Such a near-term goal has the effect of reducing energy burden and enrolling continually more eligible customers until more data is known and effective goals can be better identified.

Tracking and Accounting

NW Natural notes that several stakeholders provided support in written comments for monthly zip code level reporting and Staff indicates they will further investigate data reporting parameters. The Company will provide these reports with monthly data on a quarterly basis. NW Natural noted no objections to following the cost recovery and cost tracking of both bill discount and administrative costs as outlined in Commission Order No. 22-113 in docket UM 2233 that provides for a balancing account to track the collections and direct costs of the bill discount and a separate tracking of administrative costs in the deferral account for HB 2475 implementation.

Data collection and surveys

NW Natural is supportive of stakeholder suggestions and Staff's evaluation criteria for continuous collaboration to develop how and what demographic data can best inform the program's effectiveness and how to collect the data, right-sizing this data collection and leveraging work done and data collected by other agencies and OHCS. Staff has also indicated it will further investigate data collection, particularly regarding demographic and income data and NW Natural commits to working with Staff and stakeholders in these discussions.

As stated in its initial filing, NW Natural plans to perform surveys of program participants at enrollment and again before each two-year certification cycle ends – we believe this proposal for two surveys balances comments from stakeholders to be mindful of disproportionate time burdens already placed on low-income customers with comments that suggest a greater number of surveys. NW Natural especially appreciates the offer of assistance from CEP to discuss ideas for survey questions as well as providing examples of their year-end surveys on some of their workshops to illustrate helpful concepts. The Company will continue to work with stakeholders in developing meaningful customer surveys.

NW Natural will also seek input on effective surveys for CAP agencies. Meaningful engagement with the CAP agencies remains a high priority for the Company. NW Natural will be mindful to balance the benefit survey feedback can offer with the strain on CAP agency staff resources and time.

Bundling

As indicated in its proposal, NW Natural anticipates the sharing of eligible customer information for referral to its existing low-income energy efficiency program known as the Oregon Low-Income Energy Efficiency (OLIEE) program. OLIEE is administered by the Company in partnership with CAP agencies that perform weatherization and related energy efficiency education services. This information sharing will be enabled by a consent notification that will be part of the enrollment process for program participants. NW Natural will continue to work with its energy efficiency and weatherization partnering agencies to provide information on complementary services and cross-referrals to provide a full menu of options available to low-income customers.

In addition, the Company will make energy efficiency program information available to those participating in the bill discount program through customer communications and NW Natural's low-income energy efficiency program manager who will work with energy efficiency CAP agencies. For example, through periodic meetings with weatherization CAP agencies and the OLIEE Advisory

Council (which includes CUB, CAPO and other community-based organizations, as well as representatives from the weatherization CAP agencies), information about complementary low-income programs such as the AMP and bill discount program can be shared with an opportunity for discussion and questions.

The NW Natural team is partnering with community-serving nonprofit organizations to create opportunities for eligible household to participate in the low-income weatherization program. Some examples of this increased engagement include the use of billboards, bill insert promotional materials in multiple languages and provision of program information via trusted community partners. This approach leverages the work from 2021, where NW Natural designed and implemented a robust outreach campaign on new resources available for customers with past-due bills. The outreach plan was informed by community partners and prioritized hardest to reach populations; the strategies piloted through this effort will continue to enhance outreach efforts for the interim bill discount program and similar programs, going forward.

OLIEE

A number of questions relating to low-income weatherization were raised in comments, therefore an overview of the OLIEE program may be helpful in this discussion. The OLIEE program provides weatherization projects, high-efficiency gas equipment and energy education services to income-eligible NW Natural customers. Income verification is completed at the agency level. OLIEE funds are delivered through two programs – the Community Action Program and the Open Solicitation Program (OSP).

For the Community Action Program, NW Natural partners with CAP agencies in each county to administer the OLIEE program; these agencies also use matching funds from OHCS, LIHEAP and the Department of Energy Weatherization Assistance Program to complete energy efficiency measures and/or health/safety repairs to client dwellings.

The OSP delivers funds through a competitive grant offering for energy efficiency projects. While NW Natural had previously funded OSP projects (2016-2018), the program was temporarily shuttered for multiple heating years to refine reporting and process document practices and enable higher transparency. Renewed attention to the OSP spurred new conversations and created the opportunity to reimagine the program and its potential for impact, optimize activities and offerings, increase take-up, tap unspent funds, and establish a clear process for awarding, delivering and evaluating program funds moving forward. The program has, as of 2021, been reopened and is currently providing funds to qualifying projects. This funding will be reflected in the 2021-2022 and 2022-2023 heat years.

NW Natural has been working with the OLIEE CAP agencies to identify and address observed barriers for weatherization projects. Several CAP agencies and other nonprofit partners report struggling to find a weatherization contractor—a challenge that continues to slow projects. To that end, we are in active conversations with several workforce development partners to increase weatherization training opportunities and grow the workforce. Landlord engagement is another barrier to successful weatherization. In response, we are partnering with a nonprofit organization to convene local landlords of affordable and low-income, multi-unit housing to share information on the benefits of energy efficiency retrofits and the resources available to them. To address another bottleneck identified – lack of information on weatherization – NW Natural coordinated to have information on weatherization added to the home assessment checklist performed by several nonprofits in the Portland-metro area that serve senior residents. Residents are then connected directly with the local CAP agency for more information. These examples, as well as the

reactivation of the OSP were what was being referenced in the June 6, 2022 workshop regarding additional weatherization and energy efficiency programs being rolled out.

CUB raises a number of weatherization, energy efficiency, and demand response questions that provide thoughtful consideration for the design of future programs that would complement OLIEE and the interim bill discount program. NW Natural had not considered these areas in its approach to designing the interim bill discount program. The Company proposes that discussion of these topics may be better served within Staff's investigation in UM 2211, or in other discussions or workshops that address energy burden in this holistic way. NW Natural also notes that some of these topics may also be applicable topics for an OLIEE Advisory Council meeting and welcomes the opportunity for further discussion.

Lastly, the Company anticipates that the LINA that is underway will serve as a useful baseline for future LINAs that may further explore the topics raised in stakeholder comments.

Outreach and Engagement

Community Equity and Advisory Group (CEAG)

NW Natural's CEAG will provide a valuable resource in developing and maintaining meaningful customer programs, especially those serving low-income customers. NW Natural met separately at the request of certain stakeholders in May to discuss specific concerns raised regarding CEAG members and the communication and outreach leading up to CEAG recruitment and the CEAG roll out. To be clear, the CEAG is not a replacement for existing channels of communication but is positioned to augment more "traditional" spaces such as the Integrated Resource Plan technical working groups and low income round tables. Initial recruitment focused on community-based organizations that serve an identity, community and underrepresented/underserved population present within the NW Natural Service territory in Oregon and Washington---prioritizing organizations that have not historically engaged in energy planning and Company program planning opportunities in the past.

NW Natural provides additional information on the intent of the CEAG as follows. NW Natural is committed to an authentic and effective CEAG experience and process. A core tenet of the group is to solicit ideas and encourage engagement from underrepresented populations. Quarterly meetings will center on concrete, actionable asks of the advisory group—an approach that requires clear expectations, thoughtful planning and ongoing dialogue. Engaging a third-party consultant is another important tool to ensure responsiveness and accountability to members of the CEAG. A priority for the CEAG is to finalize content that defines the CEAG operating agreement, charter, code of conduct, member responsibilities, and logistics for sharing documents and materials. Additionally, NW Natural will commit to an agreed upon process of documentation as well as response to advisory items brought forward by the CEAG. NW Natural will use best practices and guidance from the third-party consultant to develop these processes.

Community Outreach

As stated in our initial filing, NW Natural will continue the robust and extensive community outreach established for its AMP to ensure low-income, fixed-income, seniors, and hard-to-reach communities are aware of the bill discount program and how to enroll. These activities are underway and will remain core to NW Natural's outreach efforts that focus on low-income communities. The Company piloted an enhanced outreach campaign specific to the AMP in 2021 that was informed by community partners and prioritized the hardest to reach populations. Feedback from the community was overwhelmingly positive, with partners noting that the size of the accordion brochure, presentation of all five languages and contact information for Pacific Power's

and PGE's programs as especially valuable. The enhanced outreach strategies piloted through AMP will form the foundation of our approach related to the interim bill discount program and will include:

1. Creating new content in multiple languages for distribution across various messaging channels, including hard copy brochures, condensed language for social media, newsletter callouts and talking points for in-person or phone conversations.
2. Working with partners to ensure that outreach materials are integrated into existing channels of communication to not overburden nonprofits; the goal for customers to see/receive information multiple times; and enough to spur action.
3. Engaging with the over 150 distinct community partners throughout NW Natural's service territory (community action agencies, community-based organizations, housing networks, places of worship, food banks, trusted community partners, culturally specific organizations, healthcare networks, etc. that we directly engaged with through AMP).
4. Delivering information through a variety of nonprofit-led channels that include: check-in calls with homebound seniors, brochures inserted in food boxes at schools and food pantries, through US mail, e-newsletter, social media posts, etc.

One example of this extensive community outreach that will serve to provide targeted outreach to hard-to-reach communities provides an illustration of both bundling and community outreach: NW Natural has coordinated with Meals on Wheels to incorporate energy assistance and energy efficiency information in the client and home assessments conducted at three critical points of engagement. These include when a client: starts service, undergoes their annual Meals on Wheels assessment and receives a Safe Homes for Seniors assessment. During these visits, Meals on Wheels staff will provide information on energy resources, contact information of the local CAP agency and, when possible, place the initial call to the CAP agency on behalf of the resident. NW Natural has a memorandum of understanding with Meals on Wheels for this work.

Another example from the AMP outreach that could be leveraged for the interim bill discount program is the partnership with Tri-Met to distribute the AMP brochure to riders in Tri-Met's reduced fare program, which requires income qualification verified by non-profit organizations and targets veterans, seniors, individuals with disabilities and individuals earning less than 200% federal poverty level.

A final example pertains to outreach to manufactured home communities. The Company compiled a list of NW Natural customers living in a manufactured home park in Multnomah, Washington and Linn counties and sent AMP brochures to them.

This extensive community outreach will augment NW Natural's traditional customer communications through its bill inserts, website, social media and other platforms to broadcast the availability of the interim bill discount program. The Company will also coordinate with CAP agencies to ensure there is awareness of the new program for the agencies and their clients.

Conclusion

NW Natural appreciates the attention and engagement of the stakeholders involved in this proceeding and looks forward to further discussion at the July 5, 2022 workshop, and throughout the implementation and ongoing phases of the interim bill discount program.

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

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

Sincerely,

/s/ Natasha Siores
Natasha Siores
Manager, Rates and Regulatory Affairs
NW Natural
250 SW Taylor Street
Portland, OR 97204
(503) 610-7074
natasha.siores@nwnatural.com

Attachment

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Original Sheet 330-1

SCHEDULE 330 RESIDENTIAL BILL ASSISTANCE PROGRAM – OPTIONAL FOR QUALIFYING CUSTOMERS

PURPOSE:

The purpose of this schedule is to implement an optional bill assistance program for income-qualifying residential customers.

APPLICABLE:

To all income-qualified Residential Customers taking service under Rate Schedule 2 of this Tariff. Income-qualified is defined as Customers with gross household income at or below 60% of Oregon State Median Income (SMI), adjusted for household size. For customers in single-person households, eligibility is extended to those with gross household incomes the greater of 60% SMI or full-time wages at Oregon minimum wage rates for Portland Metro area.

Pending operational readiness, this program will begin as early as October 1, 2022 and no later than November 1, 2022.

BILL DISCOUNT:

Participating income-qualified Customers will receive the following credit on their monthly bill:

	Income Qualifying	Bill Discount Percentage
<u>Tier 0</u>	<u>0-15% SMI</u>	<u>40%</u>
Tier 1	<u>15-30% SMI</u>	25%
Tier 2	31%-45% SMI	20%
Tier 3*	46%-60% SMI	15%

* For customers in single-person households, Tier 3 eligibility is extended to those with gross household income that is the greater of 60% SMI or full-time wages at Oregon minimum wage rates for Portland Metro area.

SPECIAL CONDITIONS:

1. An Applicant for this bill assistance program must be the account holder and is required to provide an application that includes a self-declaration of household size and income. Household size reflects all permanent residents in the home, including adults and children. Qualifying income refers to total gross annual income, both taxable and nontaxable, from all sources for all persons in the applicant's household.
2. Renewal of a Customer's enrollment is required every two years. It is the customer's responsibility to notify the Company if there is a change in income qualification status.
3. NW Natural may also auto-enroll eligible customers that have received energy assistance or have participated in any of the Company's low-income programs with a Tier 3 bill discount. Auto-enrolled customers may provide additional information to qualify for higher tier discounts and must re-enroll every two years.
4. All applications ~~Participants that were not auto-enrolled~~ are may be subject to post-enrollment verification audit sampling, which may ~~require~~ include a showing of proof of household size and income. Bill discounts ~~will~~ may be suspended for Customers found to be ineligible or non-responsive during post-enrollment audits and customers may be rebilled for periods of ineligibility. Customers may re-apply for this program upon providing verification of eligibility.

(continue to Sheet 330-2)

Issued July x, 2022
NWN OPUC Advice No. 22-02A

Effective with service on
and after July 15, 2022

(N)

(N)

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Original Sheet 330-2

SCHEDULE 330 RESIDENTIAL BILL ASSISTANCE PROGRAM – OPTIONAL FOR QUALIFYING CUSTOMERS

SPECIAL CONDITIONS (continued):

5. Customers are only eligible to receive bill credits under this rate schedule at one residential location at any one time and only for new charges billed after enrollment or re-enrollment.

GENERAL TERMS:

This Schedule is governed by its terms, the General Rules and Regulations contained in this Tariff, any other Schedules that by their terms or by the terms of this Schedule apply to service under this Schedule, and by all rules and regulations prescribed by regulatory authorities, as amended from time to time.

(N)

(N)

Issued July x, 2022
NWN OPUC Advice No. 22-02A

Effective with service on
and after July 15, 2022