

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 71

In the Matter of

NORTHWEST NATURAL COMPANY, dba NW
NATURAL

NW Natural's 2020 Integrated Resource Plan

Filing Date Modification – Staff
Findings

On January 13, 2021, the Commission issued Order No. 21-013, which granted Northwest Natural (NW Natural or the Company) a temporary exception from OAR 860-027-0400(3), not to exceed 16 months, for the filing of the Company's next Integrated Resource Plan (IRP). The Order directed the Company to commence 2022 IRP technical working groups meetings upon release of the Oregon Department of Environmental Quality (DEQ) draft rules for "cap and reduce" under the Climate Protection Program. The extension resulted in a new IRP filing deadline of no later than July 29, 2022, and included a recommendation from Staff that further extensions should not be granted.

On July 19, 2022, NW Natural filed another petition for a temporary exception from OAR 860-027-0400(3), requesting a change to the filing date for its upcoming IRP from July 29, 2022 to September 23, 2022 to address unanticipated issues with the implementation of new modeling software required for emissions planning pursuant to new legislation and rules in Washington and Oregon. Further, the Company notes that due to the above noted challenges implementing new modeling software, it has been unable to provide stakeholders with a draft IRP in advance of its filing.

Staff believes the justification provided by the Company demonstrates good cause for modifying the date of July 29, 2022 deadline for filing the IRP. Staff agrees with the Company that the use of new modeling software is required for the emission modeling expected for planning in Oregon and that it is important that the modeling be as accurate and free from errors as is possible. Staff further agrees that it is important that stakeholders have sufficient time to review and provide feedback on an IRP draft and appreciates the Company building in time for this review before its IRP filing.

Regarding Staff's recommendation in Order No. 21-013 that further extensions not be granted, Staff notes that its concern about further extensions on the timing of the filing of the Company's next IRP was primarily due to urgency around the analysis of the Company's plan to comply with DEQ's Climate Protection Plan. The Company must begin complying with the emission reduction requirements of the CPP in 2022, and the first three-year CPP compliance window is within the IRP's near-term planning horizon. Staff does not believe that a two-month delay, especially with the near-term provision of a draft IRP, will materially harm the ability of Staff and stakeholders to conduct a thorough analysis and review of the Company's IRP.

In closing, Staff finds supports extending the deadline established in Order 21-013, with an IRP filing date no later than September 23, 2022.

Dated at Salem, Oregon, this 26th of July 2022.

/s/ Rose Anderson

Rose Anderson
Senior Economist
Energy Resources and Planning Division