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March 21, 2024

VIA ELECTRONIC FILING

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

**Re: UG 490 – NW Natural’s Request for a General Rate Revision
Response to Bench Request**

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), hereby provides a response to Administrative Law Judge Spruce’s March 7, 2024 Bench Request.

Correspondence relating to this filing should be directed to:

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Sincerely,

NW NATURAL

/s/ Eric W. Nelsen

Eric W. Nelsen
Senior Regulatory Attorney
OSB# 192566

Enclosure

NW Natural

Residential

Rate Adjustment	Filing Date (anticipated or actual)	Rate Impact in \$	Rate impact in %	Rate effective date	Schedule #
					Schedule P - PGA Forecast, Schedule 162 - PGA Gas Cost Differences, Schedule 172 - Intervenor Funding, Schedule 181 - Oregon Regulatory Fee, Schedule 183 - SRRM Adjustment, Schedule 188 - Industrial DSM, Schedule 190 - Decoupling, Schedule 195 - WARM, Schedule 177 - CAT Deferral & Incremental, Schedule 168 - Curtailment and Entitlement Revenue, Schedule 189 - TSA Security Directive (CoS), Schedule 198 - RNG Adj Mechanism, Schedule 196 - Transportation EE [1],
PGA and Other Rate Filings	9/15/2024	\$ (19,481,172)	-3.2%	11/1/2024	AWEC Deferral [2]
Compliance Filing (Incl. PGA)	10/30/2024	\$ 90,391,215	14.6%	11/1/2024	UG 490

Overall Impact

Rate Adjustment	Filing Date (anticipated or actual)	Rate Impact in \$	Rate impact in %	Rate effective date	Schedule #
					Schedule P - PGA Forecast, Schedule 162 - PGA Gas Cost Differences, Schedule 172 - Intervenor Funding, Schedule 181 - Oregon Regulatory Fee, Schedule 183 - SRRM Adjustment, Schedule 188 - Industrial DSM, Schedule 190 - Decoupling, Schedule 195 - WARM, Schedule 177 - CAT Deferral & Incremental, Schedule 168 - Curtailment and Entitlement Revenue, Schedule 189 - TSA Security Directive (CoS), Schedule 198 - RNG Adj Mechanism, Schedule 196 - Transportation EE [1],
PGA and Other Rate Filings	9/15/2024	\$ (17,231,995)	-1.8%	11/1/2024	AWEC Deferral [2]
Compliance Filing (Incl. PGA)	10/30/2024	\$ 137,677,656	14.4%	11/1/2024	UG 490

[1] NW Natural's Advice No. 23-29, New Schedules 169 and 361, Energy Efficiency Program for Transportation Customers, ADV 1582. Filed Dec. 18, 2023 (available at: <https://edocs.puc.state.or.us/efdocs/UAA/uaa325641023.pdf>).

[2] On December 27, 2023 AWEC filed an Application for an accounting order requiring NWN to defer costs and expenses associated with the Climate Protection Plan ("CPP") for transportation and special contract customers due to the invalidation of the CPP on December 20, 2023. This is ongoing and therefore a schedule has not yet been determined.

NW Natural
Oregon Jurisdictional Rate Case
Test Year Twelve Months Ended October 31, 2025
Proposed Incremental Revenue Requirement Allocation by Rate Schedule - Revenue Requirement Effects
Exhibit NW Natural/1803, Wyman

Proposed UG 490 Revenue Requirement Impacts
 Impacts of UG 490 Revenue Requirement Items, [including the application of the Plant EDIT Amortization Credit](#)

Line No.	Rate Schedule	Impact to -->		Revenue Requirement		Plant EDIT Credits		Total: Rev. Req. Items		PGA and Other Filings		Margin Revenue at Proposed Rates	Total Revenue at Proposed Rates	Combined Effects			
		Margin Revenue at Present Rates	Total Revenue at Present Rates	Margin Increase (\$)	Margin Increase (%)	Margin Increase (\$)	Margin decrease (%)	Margin Increase (\$)	Margin Increase (%)	Revenue Change (\$)	Revenue Change (%)			Total Revenue Increase (\$)	Margin Revenue Increase (%)	Total Revenue Increase (%)	Average Bill Increase (%)
		A	B	(1)	D	(2)	F	G = C+E	H	I	J			K=A+G	L=B+G+I	M=G+I	N
1	02R	\$ 360,714,887	\$ 612,638,687	\$ 112,985,293	31.3%	\$ (3,112,905)	-0.9%	\$ 109,872,388	30.5%	\$ (19,481,172)	-3.2%	\$ 470,587,275	\$ 703,029,903	\$ 90,391,215	30.5%	14.8%	14.6%
2	02R - SF	\$ 319,667,295	\$ 542,923,397	\$ 101,315,790	31.7%	\$ (2,765,676)	-0.9%	\$ 98,550,113	30.8%	\$ (17,264,310)	-3.2%	\$ 417,036,741	\$ 623,028,534	\$ 80,105,137	30.5%	14.8%	14.9%
3	02R - MF	\$ 39,289,450	\$ 66,729,258	\$ 10,769,048	27.4%	\$ (339,943)	-0.9%	\$ 10,429,105	26.5%	\$ (2,121,910)	-3.2%	\$ 51,256,867	\$ 76,574,766	\$ 9,845,507	30.5%	14.8%	12.4%
4	02R - NP SF	\$ 1,338,204	\$ 2,272,808	\$ 699,729	52.3%	\$ (5,566)	-0.4%	\$ 694,163	51.9%	\$ (72,273)	-3.2%	\$ 1,745,816	\$ 2,608,147	\$ 335,339	30.5%	14.8%	N/A
5	02R - NP MF	\$ 419,939	\$ 713,224	\$ 200,726	47.8%	\$ (1,720)	-0.4%	\$ 199,006	47.4%	\$ (22,680)	-3.2%	\$ 547,850	\$ 818,456	\$ 105,232	30.5%	14.8%	N/A
6	03C	\$ 113,389,442	\$ 205,005,581	\$ 35,857,652	31.6%	\$ (987,465)	-0.9%	\$ 34,870,187	30.8%	\$ (1,001,750)	-0.5%	\$ 148,259,629	\$ 238,874,019	\$ 33,868,437	30.8%	16.5%	16.5%
7	03I	\$ 2,405,057	\$ 5,461,962	\$ 502,635	20.9%	\$ (13,830)	-0.6%	\$ 488,805	20.3%	\$ 78,848	1.4%	\$ 2,893,862	\$ 6,029,614	\$ 567,653	20.3%	10.4%	10.4%
8	27R	\$ 593,328	\$ 1,089,626	\$ 218,005	36.7%	\$ (6,002)	-1.0%	\$ 212,003	35.7%	\$ (24,147)	-2.2%	\$ 805,332	\$ 1,277,483	\$ 187,857	35.7%	17.2%	17.2%
9	31CSF	\$ 10,045,606	\$ 20,378,411	\$ 2,099,241	20.9%	\$ (57,761)	-0.6%	\$ 2,041,479	20.3%	\$ (197,009)	-1.0%	\$ 12,087,085	\$ 22,222,882	\$ 1,844,470	20.3%	9.1%	9.3%
10	31CTF	\$ 1,140,610	\$ 1,195,515	\$ 171,758	15.1%	\$ (4,730)	-0.4%	\$ 167,028	14.6%	\$ 109,311	9.1%	\$ 1,307,637	\$ 1,471,853	\$ 276,338	14.6%	23.1%	23.3%
11	31ISF	\$ 3,467,751	\$ 9,225,024	\$ 724,685	20.9%	\$ (19,974)	-0.6%	\$ 704,711	20.3%	\$ 233,491	2.5%	\$ 4,172,462	\$ 10,163,226	\$ 938,202	20.3%	10.2%	10.3%
12	31ITF	\$ 156,930	\$ 164,955	\$ 23,633	15.1%	\$ (651)	-0.4%	\$ 22,982	14.6%	\$ 14,497	8.8%	\$ 179,912	\$ 202,433	\$ 37,478	14.6%	22.7%	22.9%
13	32CSF	\$ 14,016,743	\$ 37,299,201	\$ 2,929,216	20.9%	\$ (80,541)	-0.6%	\$ 2,848,675	20.3%	\$ 961,781	2.6%	\$ 16,865,419	\$ 41,109,658	\$ 3,810,456	20.3%	10.2%	10.9%
14	32ISF	\$ 3,667,040	\$ 13,864,650	\$ 552,237	15.1%	\$ (15,130)	-0.4%	\$ 537,107	14.6%	\$ 545,903	3.9%	\$ 4,204,147	\$ 14,947,659	\$ 1,083,010	14.6%	7.8%	8.6%
15	32CTF	\$ 994,454	\$ 1,034,491	\$ 149,735	15.1%	\$ (4,136)	-0.4%	\$ 145,599	14.6%	\$ 84,177	8.1%	\$ 1,140,052	\$ 1,264,267	\$ 229,776	14.6%	22.2%	25.5%
16	32ITF	\$ 6,714,797	\$ 7,145,810	\$ 1,011,210	15.1%	\$ (27,809)	-0.4%	\$ 983,401	14.6%	\$ 291,410	4.1%	\$ 7,698,198	\$ 8,420,622	\$ 1,274,811	14.6%	17.8%	24.1%
17	32CSI	\$ 2,566,247	\$ 14,556,003	\$ 536,362	20.9%	\$ (14,796)	-0.6%	\$ 521,566	20.3%	\$ 580,897	4.0%	\$ 3,087,813	\$ 15,658,466	\$ 1,102,463	20.3%	7.6%	8.4%
18	32ISI	\$ 2,990,958	\$ 18,212,065	\$ 625,005	20.9%	\$ (17,257)	-0.6%	\$ 607,749	20.3%	\$ 776,053	4.3%	\$ 3,598,707	\$ 19,595,866	\$ 1,383,801	20.3%	7.6%	8.6%
19	32CTI	\$ 515,000	\$ 548,367	\$ 77,553	15.1%	\$ (2,139)	-0.4%	\$ 75,413	14.6%	\$ 26,811	4.9%	\$ 590,413	\$ 650,592	\$ 102,224	14.6%	18.6%	15.9%
20	32ITI	\$ 5,539,411	\$ 6,255,167	\$ 833,871	15.1%	\$ (23,312)	-0.4%	\$ 810,559	14.6%	\$ (231,095)	-3.7%	\$ 6,349,970	\$ 6,834,631	\$ 579,464	14.6%	9.3%	17.5%
21	33T	\$ 0	\$ 0	\$ 0	0.0%	\$ 0	0.0%	\$ 0	0.0%	\$ -	0.0%	\$ 0	\$ 0	\$ 0	0.0%	0.0%	0.0%
Total		\$ 528,918,261	\$ 954,075,517	\$ 159,298,092	30.1%	\$ (4,388,440)	-0.8%	\$ 154,909,651	29.3%	\$ (17,231,995)	-1.81%	\$ 683,827,912	\$ 1,091,753,173	\$ 137,677,656	29.29%	14.43%	(5)

NOTE (1): Revenue Requirement spread based on the Company's proposal described in Testimony NW Natural/1800, Wyman.
 NOTE (2): Plant excess deferred income taxes (EDIT) amortization credit spread to all rate schedules based on the revenue requirement spread noted above.
 NOTE (3): 02R indicates the entire Residential rate class. Below it are the four proposed Residential sub-classes that make-up the class-wide total. They are as follow. 02R - SF : Existing Single-Family;
 02R - MF : Existing Multi-Family; 02R - NP SF: New Premise Single-Family; 02R - NP MF: New Premise Multi-Family.
 NOTE (4): The proposed margin revenue increase is based on volumetric billing rates rounded to the fifth decimal as necessitated by the Company's tariff. Therefore, there may be a small discrepancy with the indicated revenue requirement.
 NOTE (5): The average customer bill percentage impact figure calculation excludes pipeline capacity charges for RS 31 and RS 32 rate classes, and thus the bill rate impacts for these schedules are overstated.
 NOTE (6): Revenue change is based on current (2023-24) revenues from the Purchased Gas Adjustment filings and the newly forecasted revenue for 11/1/2024