

DATE: January 22, 2020
FROM: Nick Sayen
DOCKET: UM 2030



Updated timeline and request for written comments

The December 13, 2019 Oregon Public Utility Commission (OPUC) Staff workshop concluded with a review of immediate next steps, and the timeline for finishing Phase 1 and Phase 2.

The original timeline for Phase 1 and Phase 2 was established in an October 22, 2019 Staff memo and is as follows:

Phase 1

- By December 15, there will be an initial stakeholder workshop for NW Natural to present its updated RNG evaluation methodology and for stakeholders to ask questions to gain an understanding of the avoided cost methodology.
- By January 15, there will be an opportunity for stakeholders to submit comments within UM 2030 describing any concerns or recommendations on the methodology.
- By February 15, there will be an opportunity for reply comments from NW Natural.

Phase 2

- When NW Natural has a project for consideration, the Company will file work papers demonstrating the RNG methodology as applied to the RNG project.
- Within two months of the date the company shares the RNG project information, there will be a final opportunity for all parties to submit comments on the methodology.
- Within one month, Staff will bring a recommendation to the Commission at a public meeting. Commissioners will have the option to acknowledge the methodology and/or provide further guidance.

While NW Natural did present updates to the proposed methodology for determining the cost-effectiveness of bringing renewable natural gas (RNG) resources to customers (Appendix H) at the December 13 workshop, the work was not complete and the Company continued to make revisions after the workshop.

However, the Company has now submitted an updated Appendix H for review. As such Staff will reset the original Phase 1 and Phase 2 timeline as follows:

Revised Phase 1

- By December 15, there will be an initial stakeholder workshop for NW Natural to present its updated RNG evaluation methodology and for stakeholders to ask questions to gain an understanding of the avoided cost methodology. **COMPLETE**
- **January 10, 2020, NW Natural submits updated Appendix H for review. COMPLETE**
- By ~~January 15~~ **Tuesday, February 18, 2020**, there will be an opportunity for stakeholders to submit comments within UM 2030 describing any concerns or recommendations on the methodology.
- By ~~February 15~~ **Tuesday, March 17, 2020**, there will be an opportunity for reply comments from NW Natural.

Revised Phase 2

NOTE: the timing of phase 2 is and has been fluid, the timing depending on when NW Natural has a project ready for consideration. As such no explicit change is made at this time.

- When NW Natural has a project for consideration, the Company will file work papers demonstrating the RNG methodology as applied to the RNG project.
- Within two months of the date the company shares the RNG project information, there will be a final opportunity for all parties to submit comments on the methodology.
- Within one month, Staff will bring a recommendation to the Commission at a public meeting. Commissioners will have the option to acknowledge the methodology and/or provide further guidance.

REQUEST FOR WRITTEN COMMENTS

OPUC Staff request written comments from stakeholders and all interested parties in response to the question below:

Staff requests stakeholders review the updated Appendix H and consider the question of whether this methodology is appropriate for determining the cost-effectiveness of RNG projects.

Please submit all written responses to PUC.FilingCenter@state.or.us no later than Tuesday, February 18, 2020 and include "COMMENTS – DOCKET NO. UM 2030" in the subject line, so they may be properly filed in this docket.

Relevant background:

Updated Appendix H:

<https://edocs.puc.state.or.us/efdocs/HAH/um2030hah144246.pdf>

Appendix H (original), pages 399-419:

<https://edocs.puc.state.or.us/efdocs/HAA/lc71haa151218.pdf>

Oregon Public Utility Commission Staff Final Comments, pages 16-19:
<https://edocs.puc.state.or.us/efdocs/HAC/lc71hac134418.pdf>

NW Natural Final Comments, pages 20-25:
<https://edocs.puc.state.or.us/efdocs/HAC/lc71hac165146.pdf>

Docket AR 632 In the Matter of Rulemaking Regarding the 2019 Senate Bill 98 Renewable Natural Gas Programs:
<https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=22060>

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