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250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

December 13, 2022

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: RG 10 - Oregon Low-Income Gas Assistance Program (OLGA)
Annual Report (2021-2022 Program Year)**

Northwest Natural Gas Company, dba NW Natural, hereby submits its Oregon Low-Income Gas Assistance Program (OLGA) Annual Report for the 2021-2022 Program Year in accordance with the Company's Tariff P.U.C. Or. 25, Schedule 310.

Please call me at (503) 610-7326 if you have any questions.

Sincerely,

/s/ Rebecca Trujillo

Rebecca Trujillo
Regulatory Compliance

Enclosures

**NW NATURAL
OREGON LOW-INCOME GAS ASSISTANCE (OLGA)
ANNUAL REPORT
2021-2022 PROGRAM YEAR**

NW Natural's Oregon Low-Income Gas Assistance (OLGA) Program Year October 1, 2021 through September 30, 2022

BACKGROUND

NW Natural's Oregon Low-Income Gas Assistance (OLGA) program provides natural gas bill payment assistance to income-eligible households. The OLGA program is designed to supplement federal Low-Income Home Energy Assistance Program (LIHEAP) funding.

HISTORY OF PROGRAM FUNDING

NW Natural began collecting public purposes funding for low-income bill payment assistance in October 2002 in accordance with the Oregon Public Utility Commission (OPUC) Order No. 02-634 in Docket UG-143. Funds for low-income bill payment assistance were initially collected through a 25-cent surcharge on all Oregon residential customer bills.

Effective May 11, 2006, this charge was increased to 31 cents. On November 1, 2008, the collection was revised from 31 cents per bill to a 0.33% charge applied to residential customers' total energy bill. At the same time this change was made, language was added to the tariff to allow the Company to redirect any portion of a separate 0.25% charge toward either the OLGA program or the Oregon Low-Income Energy Efficiency (OLIEE) program. The Company reviews OLGA and OLIEE funding annually. While the Company values weatherization as a longer-term solution to high bill issues, the OLIEE program does not always keep pace with its funding. If OLIEE has a surplus of funds, collections may be reallocated to the OLGA program.

From October 2008 through October 2010, OLGA was funded by both the 0.25% charge and the 0.33% charge. Effective October 1, 2010, the 0.25% charge was redirected to funding OLIEE. At the same time, OLGA collections were raised by 0.25% resulting in no change to OLGA program funding.

OLGA program funding was increased once again in 2012 when the Company filed its rate case (UG-221). As a result of this proceeding, the residential charge funding the OLGA program was increased from 0.58% to 0.75%. No changes have been made to the charge since 2012.

PROGRAM ADMINISTRATION

Since OLGA's inception in 2003, the Company has worked closely with staff members from the OPUC, Oregon Housing and Community Services (OHCS), Community Action Partnership of Oregon (CAPO) and the Community Action Agencies ("Agencies") who deliver the program to customers. Representatives from each of the Agencies have jointly formed the OLGA Advisory Council. The Council meets regularly to ensure that application and program administration processes are streamlined and managed effectively, and all concerns are addressed so that the shared goal of serving as many qualifying customers as possible is attained.

The OLGA Advisory Council has met quarterly since July of 2005. In 2009, physical meetings were largely replaced with teleconferences with at least one face-to-face meeting each Program Year. This Program Year, teleconference meetings were held November 9, 2021, February 8, 2022, May 10, 2022, and August 9, 2022. However, due to lingering concerns about COVID-19 and illness, we were again unable to hold our planned annual face-to-face meeting at NW Natural's new headquarters. When concerns about COVID-19 are diminished, NW Natural will renew its practice of scheduling an annual face-to-face meeting with the Council.

During the 2021/2022 Program Year, the Company continued to work very closely with the Agencies, OHCS and the OPUC to implement program administration changes in response to feedback from CAPO and the need to be responsive to the COVID-19 pandemic. In 2021 and 2022, the Company also continued to follow the process implemented in March of 2020 where the Company offered guidance to the Agencies in order to provide flexibility in the intake process. This allowed for remote work and accommodation of applications by phone as well as flexible documentation processes, such as verbal signatures. This guidance followed OHCS's Oregon Energy Assistance Program (OEAP) Temporary Eligibility Standards COVID-19 Emergency Declaration. Additionally, the Agencies have continued to qualify clients for OLGA grants using categorical eligibility. With categorical eligibility, customers are deemed automatically eligible for assistance from OLGA based on participation in select federal programs, such as SNAP (Supplemental Nutrition Assistance Program, i.e., the federal food stamp program), SSI (Supplemental Security Income), or TANF (Temporary Aid to Needy Families).

To provide additional flexibility during the OLGA intake process for applicants with involuntarily disconnected gas service or an applicant no longer considered a NW Natural customer, the need for a three-way phone call between NW Natural, the Agency and the customer has been eliminated. During the OPUC's Division 21 Rule review, NW Natural expressed concerns about the need to speak directly to an applicant to reactivate their gas account during the energy assistance process. The outcome of the review allows NW Natural to accept an energy assistance pledge from an Agency and activate an applicant's account, if necessary, without speaking directly to the applicant during the intake process.

Through the 2021-2022 Program Year, NW Natural implemented a pilot program to allow additional forms of identification for OLGA applications during a trial period. **OLGA applicants/customers of record may provide an example of documentation shown below to establish identity in lieu of a valid form of photo identification:**

- Birth Certificate
- Social Security Number or Records
- School Records
- Insurance Card or Insurance Records
- Tax Records
- DHS Printout or Paystub
- Court or Government Records

Darcy Noxon’s memorandum, dated July 19, 2021, stated: “NW Natural will audit the Program no later than December 1, 2022, to determine if there is evidence of increased incidents of fraud or identity theft after allowing forms of identification that don’t contain a photo to verify identity. If the Program appears to be more vulnerable to fraud and identity theft at any point, these forms of identification may be removed from the Program, but the goal will be to make them permanent if their addition proves to be a positive change. NW Natural will make changes sooner or at a later date if it becomes necessary to guard the integrity of the Program.” As of December 1, 2022, the referenced audit is delayed and pending due to regulatory priorities related to low-income programs and COVID-19 updates. Therefore, NW Natural has not made a final decision to move this process from a pilot program to a permanent program. The audit of our pilot program is now expected to be completed by March 31, 2023

During the 2021-2022 Program Year, NW Natural investigated expanding the OLGA Program in Multnomah County to add four additional Community Action Agencies. On August 31, 2022, Darcy Noxon, OLGA Advisory Council Committee Chair, Benedikt Springer, Community Action Partnership of Oregon (CAPO), and two additional OLGA Advisory Council Committee members met with the Executive Directors of Latino Network, Immigrant and Refugee Community Organization (IRCO), and Native American Youth and Family Center (NAYA) to discuss their interest in delivering NW Natural’s OLGA program in Multnomah County. El Programa Hispano Catolico (EPHC) was invited to this meeting, but the Executive Director was unavailable. These four agencies have indicated they are interested in delivery of the OLGA program, although EPHC has indicated the potential for staffing challenges. NW Natural plans to expand our internal accounting system for OLGA to accommodate additional agencies in anticipation of the addition of new OLGA partners. Once that work is complete, we will schedule a follow-up meeting with the four Agencies in the 2022-2023 Program Year to discuss next steps for OLGA program delivery.

In July 2022, NW Natural’s Residential Bill Discount Program was approved by the OPUC. Customers who received energy assistance or have participated in any of the Company’s low-income programs are eligible to be auto-enrolled in this program at the default bill discount percentage of 15%. In the August 9, 2022 OLGA Advisory Council meeting, NW Natural presented a proposal for the Community Action Agencies to provide NW Natural with energy assistance recipient’s income and household size on routine OLGA Payment Detail Reports used to report recipients’ OLGA grants. This income and household size information allows energy assistance recipients to receive not only auto-enrollment for the NW Natural Residential Bill Discount Program, but potentially a bill discount percentage which may be higher than the default auto-enroll percentage. The Community Action Organization (CAO) of Washington County assisted NW Natural in the development and piloting of this new process and was the first to implement it and share their experience with the Council. Most of the Agencies who were able to incorporate this proposed process into their normal work stream were willing to provide NW Natural with the OLGA recipient’s income and household size so that their clients/our customers will receive the highest possible bill discount percentage available to them without having to take any action.

PROGRAM YEAR RESULTS

Two tables are attached:

Table 1 provides the 2021-2022 Program Year actual revenues less actual expenditures by month from October 2021 through September 2022. The Agencies distributed \$2,628,328 in OLGA funds, which assisted 6,086 households in NW Natural’s service territory. The Agencies were paid \$525,665.60 for Administration and Program Delivery of the OLGA funds to NW Natural’s customers to assist them with their energy bills.

Table 2 shows Agency statistics for the 2021-2022 Program Year.

CONCLUSION

The Agencies have done an excellent job in their delivery of the OLGA funds during the 2021-2022 Program Year despite the many challenges presented by the pandemic.

NW NATURAL

**Table 1 - October 2021 through September 2022
Oregon Low-Income Gas Assistance Program (OLGA)**

Program-To-Date Summary		Revenues			Expenditures			Number of Customers Served
Roll-Over	Revenues	Interest	Total Revenues	Customer Payments	Agency Payments	Total Expenditures		
1,233,248.88	3,521,853.23	5,176.05	4,760,278.16	2,628,328.00	525,665.60	3,153,993.60	6,086	

2021-2022		Revenues			Expenditures			Actual Revenues less Actual Expenditures
Program Month	Beginning Account Balance	Monthly Program Revenues	Interest	Total Revenues Balance	Payments to Customers	Payments to Agencies [1]	Total Expenditures	
2021								
October	\$1,233,248.88	\$102,958.92	\$9.31	\$1,336,217.11	\$122,933.00	\$24,586.60	\$147,519.60	\$1,188,697.51
November	\$1,188,697.51	\$163,927.00	\$8.58	\$1,352,633.09	\$296,994.00	\$59,398.80	\$356,392.80	\$996,240.29
December	\$996,240.29	\$274,843.80	\$8.70	\$1,271,092.79	\$240,474.00	\$48,094.80	\$288,568.80	\$982,523.99
2022								
January	\$982,523.99	\$494,171.98	\$13.69	\$1,476,709.66	\$250,211.00	\$50,042.20	\$300,253.20	\$1,176,456.46
February	\$1,176,456.46	\$579,258.69	\$8.06	\$1,755,723.21	\$270,167.00	\$54,033.40	\$324,200.40	\$1,431,522.81
March	\$1,431,522.81	\$462,133.98	\$8.69	\$1,893,665.48	\$296,796.00	\$59,359.20	\$356,155.20	\$1,537,510.28
April	\$1,537,510.28	\$387,537.87	\$8.95	\$1,925,057.10	\$196,548.00	\$39,309.60	\$235,857.60	\$1,689,199.50
May	\$1,689,199.50	\$356,461.02	\$25.61	\$2,045,686.13	\$186,422.00	\$37,284.40	\$223,706.40	\$1,821,979.73
June	\$1,821,979.73	\$290,010.23	\$89.26	\$2,112,079.22	\$206,512.00	\$41,302.40	\$247,814.40	\$1,864,264.82
July	\$1,864,264.82	\$186,648.28	\$816.54	\$2,051,729.64	\$160,117.00	\$32,023.40	\$192,140.40	\$1,859,589.24
August	\$1,859,589.24	\$123,957.57	\$1,585.80	\$1,985,132.61	\$200,770.00	\$40,154.00	\$240,924.00	\$1,744,208.61
September	\$1,744,208.61	\$99,943.89	\$2,592.86	\$1,846,745.36	\$200,384.00	\$40,076.80	\$240,460.80	\$1,606,284.56
2021-2022		\$3,521,853.23	\$5,176.05		\$2,628,328.00	\$525,665.60	\$3,153,993.60	\$1,606,284.56

Deposits and Interest \$3,527,029.28

Oregon Low-Income Gas Assistance Program (OLGA)

Agency Statistics

Program Year 2021 - 2022

TABLE 2
AGENCY STATISTICS

YTD PROGRAM TOTALS	
# of Households Served	6,086
Average Payment Per Household	\$431.86

	Post: Nov For: Oct	Post: Dec For: Nov	Post: Jan For: Dec	Post: Feb For: Jan	Post: Mar For: Feb	Post: Apr For: Mar	Post: May For: Apr	Post: Jun For: May	Post: Jul For: Jun	Post: Aug For: Jul	Post: Sep For: Aug	Post: Oct For: Sep	YTD	% of Total Customers	% of Total Dollars	% of Mult. Co \$
Community Action Organization																
CAO # of Households Served	23	117	94	62	69	60	55	72	148	101	102	173	1,076	17.68%	18.88%	
Average Payment per household	\$524	\$493	\$429	\$499	\$514	\$487	\$444	\$462	\$413	\$455	\$433	\$472	\$461			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
Community Action Team																
CAT # of Households Served	16	52	53	42	44	34	20	23	16	3	18	0	321	5.27%	4.60%	
Average Payment per household	\$355	\$351	\$350	\$379	\$377	\$420	\$389	\$377	\$403	\$395	\$412	\$0	\$376			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
Clackamas County Social Services																
CCSSD # of Households Served	39	98	76	91	49	97	32	50	57	35	53	29	706	11.60%	10.68%	
Average Payment per household	\$344	\$378	\$411	\$397	\$399	\$406	\$432	\$404	\$407	\$403	\$398	\$395	\$397			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
Community Service Consortium																
CSC # of Households Served	152	171	93	111	94	112	75	54	38	24	46	45	1,015	16.68%	15.58%	
Average Payment per household	\$335	\$344	\$389	\$444	\$432	\$448	\$456	\$389	\$440	\$467	\$454	\$432	\$403			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
Health & Human Services																
H&HS # of Households Served	0	11	39	45	62	39	29	16	25	16	34	43	359	5.90%	5.23%	
Average Payment per household	\$0	\$360	\$433	\$337	\$386	\$396	\$364	\$381	\$387	\$387	\$400	\$369	\$383			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
Human Solutions																
HSI # of Households Served	16	17	8	40	54	37	31	33	19	23	16	35	329	5.41%	6.31%	30.60%
Average Payment per household	\$427	\$554	\$391	\$474	\$507	\$540	\$498	\$628	\$522	\$433	\$523	\$451	\$504			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
Impact NW																
IMPCT # of Households Served	21	50	26	35	47	54	22	21	25	16	25	12	354	5.82%	6.17%	29.92%
Average Payment per household	\$459	\$460	\$413	\$413	\$474	\$443	\$530	\$443	\$489	\$452	\$499	\$442	\$458			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
Mid-Columbia Community Action																
MCCAC # of Households Served	0	14	7	3	8	7	7	1	2	1	4	2	56	0.92%	0.88%	
Average Payment per household	\$0	\$341	\$416	\$410	\$471	\$414	\$388	\$887	\$395	\$390	\$448	\$510	\$414			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
Mid-Willamette Valley Community Action Agency																
MWVCA # of Households Served	6	129	127	102	134	156	112	111	117	112	128	94	1,328	21.82%	21.81%	
Average Payment per household	\$431	\$434	\$413	\$442	\$422	\$428	\$458	\$426	\$448	\$430	\$420	\$436	\$432			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
Oregon Coast Community Action Agency																
ORCCA # of Households Served	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%	
Average Payment per household	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0			
% funds disbursed to Administration													0%			
SEI Community Services																
SEI # of Households Served	39	54	43	41	38	53	35	33	22	27	28	12	425	6.98%	8.15%	39.48%
Average Payment per household	\$453	\$446	\$500	\$509	\$494	\$568	\$533	\$518	\$518	\$446	\$515	\$630	\$504			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
Yamhill Community Action Partnership																
YCAP # of Households Served	11	12	19	6	14	9	15	5	6	10	7	3	117	1.92%	1.71%	
Average Payment per household	\$372	\$336	\$346	\$351	\$376	\$512	\$400	\$373	\$436	\$369	\$403	\$435	\$384			
% funds disbursed to Administration	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%	20%			
0																
# of Households Served	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%	
Average Payment per household	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0			
% funds disbursed to Administration													0%			
0																
# of Households Served	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00%	0.00%	
Average Payment per household	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0			
% funds disbursed to Administration													0%			