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Send the completed Cover Sheet and the Report in an email addressed to PUC.FilingCenter@puc.oregon.gov

Send confidential information, voluminous reports, or energy utility Results of Operations Reports to PUC Filing Center, PO Box 1088, Salem, OR 97308-1088 or by delivery service to 201 High Street SE Suite 100, Salem, OR 97301.



250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

March 30, 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 2 - NW Natural's 2021 Smart Energy™ Annual Report

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), files herewith its 2021 Smart Energy™ Annual Report in compliance with the terms established in Schedule 400, "Smart Energy™ Program."

In addition, below is the link to the Smart Energy™ Customer Report landing page on NW Natural's website; the 2021 Annual Report will be uploaded to the website on or before April 1, 2022.

<https://nwnatural.com/smartenergy>

Please address any 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
eFiling@nwnatural.com

Sincerely,

/s/ Rebecca T. Brown

Rebecca T. Brown
Regulatory Consultant
(503) 610-7326

Enclosure

INTRODUCTION

NW Natural's Smart Energy™ program offers customers an opportunity to offset their natural gas usage by purchasing high-quality greenhouse gas offsets. The money collected through Smart Energy™ customer charges are invested in local renewable energy projects — generally regional biogas projects — that will generate carbon offsets.

In its effort to provide high quality carbon offsets, the Company has contracted with The Climate Trust, a nationally recognized leader in the carbon market. The Climate Trust identifies projects and contracts for offsets, then verifies, and retires each Smart Energy™ offset.

According to the terms and conditions of Oregon Schedule 400 and Washington Schedule U, NW Natural herein provides the Public Utility Commission of Oregon (OPUC) and the Washington Utilities and Transportation Commission (WUTC) with an annual report detailing the program's participation, funds collected, program costs, and The Climate Trust's offset expenditures for the calendar year 2021.

TOTAL ACTIVE ENROLLMENTS

As of December 31, 2021, over 73,000 customers were enrolled in the program, increasing enrollment by over 19 percent from the previous year. Of the 73,428 active residential customers enrolled, 48,896 or 66.6 percent have selected the Climate Neutral option.

Tables 1a and 1b demonstrate active enrollments as of December 31, 2021, and enrollment changes since December 31, 2020.

TABLE 1A – ACTIVE ENROLLMENT

2021				
System Total	# of Customers	% of Customers	Enrollments	Enrollment % change from prior year
Residential	715,958	10.26%	73,428	18.85%
Commercial	69,939	0.68%	474	55.41%
	785,897		73,902	19.03%

Table 1b – Active Enrollment by State

2021				
Oregon	# of Customers	% of Customers	Enrollments	Enrollment % change from prior year
Residential	629,262	11.21%	70,544	17.76%
Commercial	62,543	0.72%	451	52.36%
	691,805		70,995	17.93%
2021				
Washington	# of Customers	% of Customers	Enrollments	Enrollment % change from prior year
Residential	86,696	3.33%	2,884	53.81%
Commercial	7,396	0.31%	23	155.56%
	94,092		2,907	54.30%

ANALYSIS OF PARTICIPANT FUNDS COLLECTED AND PROGRAM SPENDING

The Company transfers 70 percent of net funds collected from participants to The Climate Trust, which reflects the projected split of program marketing and administrative costs and funds for offset purchases. Net collections are transferred on a two-month lag. Table 2 presents collections for the year ended December 31, 2021, net of an uncollectible allowance and amounts designated for marketing and administration during the year.

TABLE 2 – FUNDS COLLECTED AND TRANSFERS DUE

Collections, net of uncollectible allowance	\$3,905,387.36
Less: 30% for marketing and administration	\$1,171,616.21
Total due to The Climate Trust for offset purchases	\$2,733,771.15

Due to the lag between bills issued and funds transferred, the November and December 2021 billings, \$595,498.62, will be transferred to The Climate Trust within the first two months of 2022. NW Natural spent approximately \$1,366,050.00 for the year on marketing and

administrative costs which was derived from the \$1,171,616.21 of 2021 collections (see Table 2) and \$194,433.79 from funds re-allocated from The Climate Trust to marketing¹.

REPORT ON THE CLIMATE TRUST

Carbon Reduction

The commitment of total carbon reductions for the reporting period is approximately 217,876 short tons. The Climate Trust received \$2,692,398.54² for offset purchases for program participants during the reporting period.

Offset Funds

Program revenues from inception to December 31, 2021, received by The Climate Trust totaled \$16,718,646.93 for the purchasing and managing of offset project contracts.

Funding Obligation Commitment

As of December 31, 2021, The Climate Trust has obligated program funds for 1,708,690 short tons of offsets, exceeding the requirement through 2021. The status of obligating funds for terms of demand is reflected as short tons in table 3.

TABLE 3 - COMMITMENT STATUS AS OF 12/31/2021

Year	Demand Short Tons	Short Tons Obligated	Obligation Deadline ³	Status (% met)
2007	1,454	1,454	1/1/2010	100%
2008	15,360	15,360	1/1/2010	100%
2009	28,019	28,019	1/1/2011	100%
2010	37,020	37,020	1/1/2012	100%
2011	48,195	48,195	1/1/2013	100%
2012	54,989	54,989	1/1/2014	100%
2013	69,979	69,979	1/1/2015	100%
2014	80,773	80,773	1/1/2016	100%
2015	85,699	85,699	1/1/2017	100%
2016	101,153	101,153	1/1/2018	100%
2017	131,243	131,243	1/1/2019	100%
2018	141,324	141,324	1/1/2020	100%
2019	176,499	176,499	1/1/2021	100%
2020	191,824	191,824	1/1/2022	100%
2021	217,876	217,876	1/1/2023	100%
	1,381,407	1,381,407		100%

CARBON OFFSET PROJECTS

The Smart Energy™ program obligated funds or acquired offsets in 2021 from the projects listed in table 4.

TABLE 4 – 2021 PROJECT OBLIGATIONS AND RETIREMENTS

Bettencourt Dairy
Davis Landfill
J.R. Simplot Moses Lake 2
Maas Energy Works Van Warmerdam
Shaan Seet
Winston Creek
Roseburg Landfill

¹ If offsets are purchased at a cost that is less than The Climate Trust's price cap, the difference is placed into the risk mitigation fund which is used for three purposes: 1) Purchase additional offsets to meet future Smart Energy demand when preferred projects are available, but current customer demand is less than the opportunity and program funds cannot cover the obligation; 2) Cover potential cost differential between contracted price and replacement price, should a project underperform; and 3) Fund additional program activity. The Company consults with The Climate Trust before it determines the appropriate use of risk mitigation funds.

² This amount is different from the \$2,733,771.15 stated in Table 2 for 2021 net collections because of the two-month lag for transfers. It includes November and December 2020 net collections transferred in 2021 and excludes November and December 2021 net collections due to be transferred in 2022.

³ Schedule 400 in Oregon and Schedule U in Washington, NW Natural must obligate funds for offsets within 24 months of issuing a bill.