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COMPANY NAME:

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Select report type: RE (Electric) RG (Gas) RW (Water) RT (Telecommunications)
RO (Other, for example, industry safety information)

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Report is required by: OAR
Statute
Order

Note: A one-time submission required by an order is a compliance filing and not a report (file compliance in the applicable docket)

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List Key Words for this report. We use these to improve search results.

Send the completed Cover Sheet and the Report in an email addressed to PUC.FilingCenter@state.or.us

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.



March 1, 2024

250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
PO Box 1088
Salem, OR 97308-1088

RE: RG 87 – NW Natural’s 2023 Energy Efficiency Avoided Costs Annual Report (UM 1893)

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith its Energy Efficiency Avoided Costs Annual Report in compliance with OAR 860-030-0011(1) using the specified forms as approved in Public Utility Commission of Oregon (Commission) Order No. 19-252.

The first six tabs of the Energy Efficiency Avoided Costs Annual Report after the Instructions tab are based on avoided costs found in Appendix C of NW Natural’s 2022 Integrated Resource Plan (IRP) as acknowledged in part in LC 79. Note that in April 2023, the environmental compliance costs provided in the “3) Environ.Compliance – IRP” tab slightly differ from what is published in NW Natural’s IRP Appendix C as these values have been updated in response to Staff Recommendation 33 (see Commission Order No. 23-281 from our IRP docket LC 79). These compliance costs represent the marginal resource costs identified for the Climate Protection Program (CPP) compliance when Senate Bill 98 targets are not prioritized over Community Climate Investment (CCI) purchases. We are also providing alternative values in the later tabs of the workbook to reflect the latest estimates of real discount rates, inflation rates, and social costs of carbon that better represent the dynamic economic and climate policy environment. In light of the Oregon Court of Appeals ruling that invalidated the CPP, NW Natural suggests using the social cost of carbon as the avoided greenhouse gas cost.

Please address correspondence on this matter to me with copies to the following:

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Sincerely,

/s/ Natasha Siores

Natashas Siores
Senior Manager, Regulatory Compliance

Attachment