PUBLIC UTILITY COMMISSION OF OREGON STAFF REPORT PUBLIC MEETING DATE: January 25, 2022

REGULAR CONSENT X EFFECTIVE DATE January 26, 2022

DATE: January 11, 2022

TO: Public Utility Commission

FROM: John Fox

THROUGH: Bryan Conway and John Crider SIGNED

SUBJECT: NORTHWEST NATURAL:

(Docket No. ADV 1359/Advice No. 21-20)

Schedule 196 Correction.

STAFF RECOMMENDATION:

Staff recommends the Public Utility Commission of Oregon (Commission) approve Northwest Natural Gas Company's (NW Natural or Company) Advice No. 21-20, correcting the ending date of the amortization period from March 31, 2023 to October 31, 2023, effective with service rendered on and after January 26, 2022.

DISCUSSION:

Issue

Whether the Commission should approve NW Natural's Advice No. 21-20 to make a housekeeping revision to correct the ending date of Gas Reserves excess deferred income taxes (EDIT).

Applicable Rule or Law

ORS 757.205 requires public utilities to file all rates, rules and charges with the Commission. ORS 757.210 provides that the Commission may approve tariff changes if they are fair, just, and reasonable. Filings that make any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the changes.

NWN Docket No. ADV 1359/Advice No. 21-20 January 11, 2022 Page 2

OAR 860-022-0025 requires that revised tariff filings include statements showing the change in rates, the number of customers affected and resulting change in annual revenue, and the reasons for the tariff revision.

Staff notes that the provisions of ORS 757.259(5) and (6) are not applicable as no rate change is proposed in this filing.

Analysis

Background

In UG 344, via Order No. 19-105, the Commission adopted a comprehensive stipulation in which the parties agreed that the Company would return Non-Plant Gas Reserves EDIT over five years through a separate tariff rider beginning on the April 1, 2019.¹

In UG 388, via Order No. 20-364, the Commission adopted a comprehensive stipulation in which the parties agreed that the Company would include all historical amortization of EDIT related to gas reserves in the annual PGA filing. The amount of annual amortization was adjusted to align with the PGA year and agreed among the parties to be \$3,724,500 per year through October 2023.²

In UG 430, via Order No. 21-374, the Commission approved NW Natural's revisions to Schedule 196 rates reflecting changes in load effective for service rendered on and after November 1, 2021.³

Staff's Analysis

Staff has reviewed NW Natural's advice filing and finds it to be consistent with UG 388 - NWN/Exhibit 1010, Walker/1 underlying Order No. 20-364, which clearly shows amortization continuing until October 2023. Staff finds that this change was inadvertently not reflected in the subsequent compliance filing, and therefore warrants correction.

Conclusion

Staff concludes that the requested tariff correction is consistent with the prior record as discussed above and should be allowed.

¹ In re NW Natural Gas Co., OPUC Docket No. UG 344 (Phase II), Order No. 19-105 at 4(Mar. 25, 2019).

² In re NW Natural Gas Co., OPUC Docket No. UG 388, Order No. 20-364 at 20 (Oct. 16, 2020).

³ In re NW Natural Gas Co., OPUC Docket No. UG 430, Order No. 21-374 (Oct. 28, 2021).

NWN Docket No. ADV 1359/Advice No. 21-20 January 11, 2022 Page 3

PROPOSED COMMISSION MOTION:

Approve NW Natural's Advice No. 21-20, correcting the amortization end date in Schedule 196, effective January 26, 2022.

ADV 1359 NWN Schedule 196 Advice No. 21-20