

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: September 22, 2015**

REGULAR  CONSENT  EFFECTIVE DATE October 1, 2015

DATE: September 14, 2015

TO: Public Utility Commission

FROM:  Lisa Gorsuch

THROUGH:  Jason Eisdorfer and  Aster Adams

SUBJECT: NORTHWEST NATURAL: (Docket No. 82/Advice No. 15-13) Revises Schedule 310, to expand the allowable identification required by the Company to determine eligibility for bill payment assistance applicants.

**STAFF RECOMMENDATION:**

Staff recommends that Northwest Natural's (NWN or Company) Docket No. 82/Advice No. 15-13 be approved and the associated tariff sheet revisions be allowed to go into effect on October 1, 2015.

**ISSUE:**

NWN filed Docket No. 82/Advice No. 15-13 on August 19, 2015, proposing to provide applicants an alternative to requiring a social security number, per the Special Conditions in Schedule 310, when applying for bill payment assistance. In addition, the Company proposes a housekeeping change to correct an inadvertent exclusion of the word "Home" in this same tariff in reference to the Low Income Home Energy Assistance Program.

**APPLICABLE STATUTES AND RULES:**

Under ORS 757.205 (1), a public utility must file schedules showing all rates, tolls and charges for service that have been established and are in force at the time. **Tariff revisions or corrections may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0005 and OAR 860-022-0025.** 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. Under OAR 860-022-0020, a utility may make an application for a tariff or rate schedule to be effective on less than statutory notice.

Additional process is required when a new rate or an increase in rates or schedules is proposed.

**DISCUSSION:**

NWN's Schedule 310, Oregon Low-Income Gas Assistance (OLGA), describes the use of funds collected under Schedule 301, Public Purpose Funding Surcharge, which are collected and designated to provide low-income bill payment assistance to eligible NWN customers.<sup>1</sup>

Currently Schedule 310 states with regard to screening and approving bill payment assistance applicants for eligibility in Special Condition number 4:

*...each Agency shall follow the established protocols for the qualification of and disbursement to eligible participants in accordance with the guidelines promulgated by State of Oregon, Department of Housing and Community Services (OHCS) and the Low-Income Energy Assistance Act of 1981 and subsequent amendments, as outlined in the OHCS Omnibus Contract.*

NWN proposes to add the following applicant eligibility language to Special Condition number 4:

*As an alternative to providing identification as required in Low Income Home Energy Assistance Program (LIHEAP) guidelines, bill payment assistance applicants may qualify by providing the identification required for residential service as described in accordance with the provision of General Rule 2 of this Tariff.<sup>2</sup>*

As indicated by NWN in its filing, Staff worked with the Company and with Community Action Partnership of Oregon (CAPO) to find a solution to qualifying eligible applicants for bill payment assistance when not all applicants have or are willing to provide their social security number to qualify. NWN, CAPO, and Staff participated in multiple meetings prior to the Company's submission of the proposed revisions.

---

<sup>1</sup> OLGA is applicable to residential customers taking service under NWN's Rate Schedule 2.

<sup>2</sup> General Rule 2:

<https://www.nwnatural.com/uploadedFiles/AboutNWNatural/RatesAndRegulations/OregonTariffBook/GeneralRulesAndRegulations/25Rule2-ai.pdf>

NWN Docket No. 82/Advice No. 15-13  
September 14, 2015  
Page 3

NWN proposes another revision to Schedule 310, which is housekeeping in nature. In Special Condition 3, NWN proposes to correct an error where the word Home was left out in reference to the Low Income Home Energy Assistance Program.

Staff supports the rule revision as filed by NWN, which will result in the First Revision of Sheet 310-1, Schedule 310, Oregon Low-Income Gas Assistance (OLGA).

**PROPOSED COMMISSION MOTION:**

NWN's Advice No. 15-13 be allowed to go into effect October 1, 2015.

NWN Docket No. 82/Advice No. 15-13