

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 79

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, dba NW Natural,

2022 Integrated Resource Plan.

MEMORANDUM

DISPOSITION: PROCEDURAL SCHEDULE MODIFIED; FEBRUARY 24, 2023
COMMISSIONER WORKSHOP CANCELED; SUPPLEMENTAL
COMMENTS DUE MARCH 8, 2023

On January 26, 2023, I issued a memorandum scheduling a second Commissioner workshop for February 24, 2023, regarding NW Natural Gas Company, dba NW Natural's Integrated Resource Plan (IRP). The February 24th workshop is canceled, and instead the Commission invites interested persons to provide a supplemental round of written comments on the questions enumerated below. These questions and the supplemental comments they invite are intended primarily to help the Commission begin to develop expectations for future IRP cycles. The Commission expects, of course, to review further comment from parties and continue its review of the issues associated with acknowledgment of the 2022 IRP. The Commission may direct some specific actions for future NW Natural IRPs in its IRP order, as it has commonly done, or it may address and adopt new expectations for IRPs in a later generic proceeding, or it may do both.

Interested persons may submit responses to any of these questions by March 8, 2023.

1. What should be the objective, or what should be the multiple distinct objectives, for modeling electrification of end uses in NW Natural's future IRPs?
2. Regarding Staff's proposal to develop a proxy cost for electrification:
 - a. How might the use of a proxy electrification cost in this IRP improve the ability to evaluate NW Natural's current or future IRPs?
 - b. How accurate should a proxy electrification cost be to provide actionable or useful information in an IRP?
 - c. How might electrification cost estimates be made more accurate and informative now and in future IRPs?
 - d. What specific elements of the cost of electrification need to be considered and assumed in such a proxy cost assessment?

3. Regarding electrification, what is NW Natural's responsibility to model electrification, as well as the company's capability to model electrification in future IRPs?
4. Should NW Natural's models be limited solely to its costs as a utility or should they incorporate household costs of electrification to some extent?
5. What actions by the Commission, if any, are necessary or helpful to enable appropriate modeling to be done now and in future IRPs?
6. How should the significant uncertainty about many future conditions, such as load estimates or zero carbon fuel cost and supply availability estimates, be addressed or weighed in the development of the near-term action plan? Is the current guidance for least cost/least risk planning sufficient?

Dated this 13th day of February, 2023, at Salem, Oregon.



Sarah Spruce
Administrative Law Judge