## VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

## Re: Schedule 301 - Oregon Low-Income Energy Efficiency (OLIEE) Programs Scheule 335 - Bill Discount Program Cost Recovery

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following revisions to its Tariff P.U.C. Or. 25, stated to become effective on January 1, 2024.

| Eleventh Revision of Sheet 301-1 | Schedule 301 | Public Purpose Funding Surcharge |
| :--- | :--- | :--- |
| First Revision of Sheet 335-1 | Schedule 335 | Bill Discount Program Cost Recovery |

## Purpose

The purpose of this filing is twofold: 1) to revise Schedule 301-1 to update the rate to reflect the Energy Trust of Oregon's forecasted budget and to pause the rate charged to customers for the Oregon Low Income Energy Efficiency (OLIEE) program portion of the rate, and 2) to revise Schedule 335 to reflect NW Natural's current forecast for the Bill Discount Program.

## Background

Through Schedule 301, costs are recovered to support three NW Natural programs: Schedule 310 Oregon Low-Income Gas Assistance (OLGA), Schedule 320 OLIEE, and Schedule 350 Energy Efficiency Services and Programs (delivered and administered by the Energy Trust of Oregon (ETO)). Schedule 335 Bill Discount Program Cost Recovery is an automatic adjustment clause tariff schedule that supports the cost of NW Natural's Bill Discount Program, that was established November 1, 2022.

## Proposed Changes

1. Schedule 301:
a. Change the rate from $3.93 \%$ to $3.34 \%$ for Schedule 350 Energy Efficiency Services and Programs - Residential and Commercial, to reflect the Energy Trust of Oregon forecasted budget.
b. Change the OLIEE rate from $0.85 \%$ to $0 \%$ for both Residential and Commercial customers.
2. Schedule 335 - Update the per-bill charges in this automatic adjustment clause tariff schedule as detailed below to reflect the current forecast for the bill discount program and true-up the prior year balance in the balancing account.

Schedule 301 - ETO Energy Efficiency Programs Update
NW Natural proposes to revise the portion of public purpose funds allocated to the ETO for the administration of residential and commercial energy efficiency programs from $3.93 \%$ to $3.34 \%$. This change is intended to provide the ETO with approximately $\$ 28$ million dollars of total program funding in 2024, which is sufficient to acquire nearly 2.7 million of therm savings.

## Schedule 301 - OLIEE Collections Update

Schedule 320 describes the OLIEE program, which is available to income-eligible residential dwellings location within NW Natural's Oregon service territory. NW Natural proposes to temporarily pause collection of OLIEE funding by setting the current rate of $0.85 \%$ to zero. This change equates to an approximate reduction of $\$ 7.1$ million. Temporarily pausing collection for OLIEE funds is practical at this time due to a build-up of the balance in the OLIEE account. The build-up is the result of a deliberate increase in funding, which began in early 2020, intended to increase energy efficiency measures for low-income customer dwellings and to enable the OLIEE program to have broader reach to low-income residents that have not previously benefitted from the OLIEE program. This increased funding was developed with the OLIEE Advisory Committee and approved by the Commission in Advice No. 19-19, docketed as ADV 1056. Subsequently the COVID-19 pandemic severely impacted the delivery of OLIEE program benefits that rely on inperson and in-home projects and measures. While OLIEE project spending has since bounced back from pre-pandemic levels, the collection of OLIEE funds at the increased rate has resulted in a build-up of the OLIEE account. NW Natural has discussed this proposal with the OLIEE Advisory Council and will continue to monitor the account balance to determine when the collections for the OLIEE program should be resumed.

## Schedule 335 - Bill Discount Program Update

NW Natural's residential Bill Discount Program was launched on November 1, 2022. Since then, 34,622 customers have enrolled in the program. Collections for the cost of the bill discounts provided by the Bill Discount Program are achieved through a per-bill charge through Schedule 335, supported by a deferred balancing account that is updated annually. NW Natural estimates a forecast of $\$ 7.93$ million needed for 2024 bill discount funding, which, when added to the $\$ 2.24$ million balancing account balance, results in a total of $\$ 10.18$ million to be collected through Schedule 335, exclusive of revenue-sensitive impacts,

## Combined Effects of All Changes

Attached are worksheets demonstrating the calculations of the proposed rates and the impacts this will have on customer bills. Bill impacts are summarized in the table below. Please see Exhibit A for the impacts for industrial rate schedules, as bill impacts for these schedules will vary by service and type.

| Class | Rate <br> Schedule | Customers | Average <br> Monthly Bill <br> Change (\$) | Average Monthly <br> Bill Change (\%) |
| :---: | :---: | :---: | :---: | :---: |
| Residential | Schedule 2 | 636,785 | $-\$ 0.38$ | $-0.5 \%$ |

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| Commercial | Schedule 3 | 59,507 | $-\$ 1.53$ | $-0.5 \%$ |
| :---: | :---: | :---: | :---: | :---: |
| Commercial | Schedule 27 | 1,489 | $\$ 0.50$ | $0.9 \%$ |
| Commercial Firm Sales | Schedule 31 | 653 | $-\$ 14.29$ | $-0.6 \%$ |

## Conclusion

NW Natural respectfully requests that the Commission approve these tariff changes to become effective January 1, 2024.

In accordance with ORS 757.205, copies of this letter and the filing made herewith are available in the Company's main office in Portland, Oregon and on its website at www.nwnatural.com.

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

```
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Respectfully submitted,
/s/ Rebecca Trujillo
Rebecca Trujillo
Regulatory Consultant

## SCHEDULE 301 <br> PUBLIC PURPOSES FUNDING SURCHARGE

## PURPOSE:

To specify the method of billing of a Public Purposes surcharge that is to fund public purposes activities to be administered through one or more independent entities. Public purposes activities include, but may not necessarily be limited to, energy efficiency programs, market transformation programs, residential low-income energy efficiency programs, and residential low-income bill payment assistance programs designed to benefit Residential and Commercial Customers within NW Natural's service territory in Oregon.

## APPLICABLE:

To Residential and Commercial Customers served on the following Rate Schedules of this Tariff:

| Residential | Commercial |
| :--- | :--- |
| Rate Schedule 2 | Rate Schedule 3 (03CSF) |
|  | Rate Schedule 27 (27R) |
|  | Rate Schedule 31 (31CSF) |

ADJUSTMENT TO RATES: Effective: January 1, 2024
A Public Purposes surcharge will be assessed on the total energy use billed (the total of the Customer Charge plus the per therm usage charges) and shown as a line item on each customer's monthly bill as follows:

Residential: $4.09 \%$ of the total energy use billed
Commercial: $3.34 \%$ of the total energy use billed
The funds collected from such Public Purposes surcharge shall be allocated to specific separate accounts to fund the specified public purposes program(s) as follows:

RESIDENTIAL:
$3.34 \%$ will support public purpose funding for Schedule 350 energy efficiency programs delivered and administered by the Energy Trust of Oregon (Energy Trust).
$0.75 \%$ will support public purpose funding for Schedule 310 low-income bill payment assistance activities.
$0.0 \%$ will support public purpose funding for Schedule 320 low-income energy efficiency activities.

## COMMERCIAL:

$3.34 \%$ will support public purpose funding for Schedule 350 energy efficiency programs delivered and administered by the Energy Trust.
$0.0 \%$ will support public purpose funding for Schedule 320 low-income energy efficiency activities.
(continue to Sheet 301-2)

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Effective with service on and after January 1, 2024

## SCHEDULE 335

## BILL DISCOUNT PROGRAM COST RECOVERY

## PURPOSE:

This Schedule recovers the costs of the Company's Bill Discount Program offered under Schedule 330 "Residential Bill Discount Program - Optional for Qualifying Customers". This Adjustment Schedule is implemented as an automatic adjustment clause as provided for under ORS 757.210.

## APPLICABILITY:

This Schedule applies to all bills of customers taking service on the rate schedules listed below:

## Application to Rates: Effective: January 1, 2024

A charge will be assessed on each bill for the applicable Rate Schedules:

| Rate Schedule | Charge per Bill |
| :---: | :---: |
| 2 | $\$ 0.94$ |
| 3 | $\$ 3.24$ |
| 27 | $\$ 0.61$ |
| 31 | $\$ 25.90$ |
| 32 | $\$ 62.77$ |

## GENERAL TERMS:

Service under this Schedule is governed by the terms of this Schedule, the General Rules and Regulations contained in this, any other schedules that by their terms or by the terms of this Schedule apply to service under this Schedule, and by all rules and regulations prescribed by regulatory authorities, as amended from time to time.

# BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON 

NW NATURAL SUPPORTING MATERIALS

NWN OPUC Advice No. 23-25, ADV November 16, 2023

# NW NATURAL 

## EXHIBIT A

Supporting Materials
NWN'S OPUC ADVICE NO. 23-25 / ADV $\qquad$
Description Page
Oregon Bill Impacts of 2023 Public Purpose Charges ..... 1
ETO-Related PPC Calculation ..... 2
Estimate for 2024 Oregon Bill Discount Program ..... 3
Calculation of Temporary Rate Adjustments: Low Income Bill Discount Program ..... 4
Development of Temporary Fixed Customer Charge Proposed Changes ..... 5
Program Effects on Average Bill by Rate Schedule ..... 6
Proposed Incremental Revenue Requirement Allocation by Rate Schedule - Program Effects ..... 7

## NW Natural

## Rates \& Regulatory Affairs

OPUC Advice No. 23-25 - Public Purpose Charges
Oregon Bill Impacts of 2023 Public Purpose Charges

1


NW Natural

## Schedule 301

## OLIEE-Related PPC Calculation

| Schedule | customers | Estimated collection for tracker year | Addition for new PPC charge |  | Current average bill with old PPC | Total \% Bill Change |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 2R | 636,785.0 | 611,925,569 | \$0.00 | \$80.53 | \$81.21 | -0.8\% |
| 27 dry-out | 1,489.0 | 1,001,168.0 | \$0.00 | \$55.79 | \$56.26 | -0.8\% |
| 3C Firm Sales | 59,172.0 | 207,192,944 | \$0.00 | \$292.32 | \$294.80 | -0.8\% |
| 31C Firm Sales | 653.0 | 18,976,433 | \$0.00 | \$2,439.88 | \$2,460.62 | -0.9\% |
|  | Total expected collection | 839,096,114 |  |  |  |  |
|  | PPC 1 year | 0 |  |  |  |  |
|  | Proposed OLIEE PPC Rate | 0.00\% |  |  |  |  |
|  | Current OLIEE related PPC | 0.85\% |  |  |  |  |
|  | Change | -0.85\% |  |  |  |  |
|  | \% Change in Rate | -100.0\% |  |  |  |  |

# NW Natural 

Rates \& Regulatory Affairs
Estimate for 2024 Oregon Bill Discount Program

| From PGA |  | From GL | amount under-collected |
| :---: | :---: | :---: | :---: |
| Average Residential use | 668 | Account 151919 balance Oct 2023 |  |
| RS 2 Fixed | \$8.00 |  |  |
| RS 2 Volumetric | \$1.29519 |  |  |
| Average monthly bill | \$80.10 |  |  |
| Average annual bill | \$961.19 |  |  |


| Analysis and other data |  | Amount to collect 2024 |  |
| :--- | :---: | :--- | :--- |
| June 2023 residential customers | 636,785 | Previous under-collection | $\$ 2,248,009.69$ |
|  |  | Forecast for 2024 | $\$ 7,930,984.25$ |
| BDP count at Sep 2023 | 34,622 | Total | $\$ 10,178,993.94$ excludes revenue-sensitive costs |
| BDP count as \% of res customers | $5.44 \%$ |  |  |

NW Natural
Rates $\&$ Regulatory Affairs
Bill Discount Program - Rate Spre
For Rates Effective lanuary 1,
For Rates Effective January 1,2024
Calculation of Temporary Rate Adjustments: Low
Calculation of temporary Rate Adjustments: Low incom
Allocted on an EQUAL PERCENTAGE OF MARGIN Basis


## NW Natural

Rates \& Regulatory Affairs
Bill Discount Program - Rate Spread and Rate Allocation
For Rates Effective January 1, 2024
Development of Temporary Fixed Customer Charge Proposed Changes
Proposal: Apply the temporary fixed charge changes based on the following rate classes
02 Residential
03 General Service Commercial and Industrial
27 Residential Dry-Out
31 Rate Class 31: All Schedules
32 Rate Class 32: All Schedules

|  | Equal \% <br> Margin | Test Year <br> Avg Customers | Fixed Charge <br> Per Bill |  | Annual Per <br> Customer | Forecasted <br> Collection |  |
| :---: | ---: | :---: | :---: | ---: | :---: | ---: | ---: |
| 2 R | $\$ 7,166,823$ | 636,785 | $\$$ | 0.94 | $\$$ | 11.28 | $\$$ |
| $7,182,935$ |  |  |  |  |  |  |  |
| 3C/3I | $\$ 2,314,912$ | 59,507 | $\$$ | 3.24 | $\$$ | 38.88 | $\$$ |
| $2,313,632$ |  |  |  |  |  |  |  |
| 27 | $\$ 10,905$ | 1,489 | $\$$ | 0.61 | $\$$ | 7.32 | $\$$ |
| 10,899 |  |  |  |  |  |  |  |
| 31 Rate Class | $\$ 280,383$ | 902 | $\$$ | 25.90 | $\$$ | 310.80 | $\$$ |
| 32 Rate Class | $\$ 701,239$ | 931 | $\$$ | 62.77 | $\$$ | 753.24 | $\$$ |
|  |  |  |  |  |  |  | 701,2642 |
| TOTALS | $\mathbf{\$ 1 0 , 4 7 4 , 2 6 2}$ | $\mathbf{6 9 9 , 6 1 4}$ |  |  |  |  | $\mathbf{\$ 1 0 , 4 8 9 , 0 7 4}$ |

NWN OPUC Advice 23-25
Exhibit A - Supporting Materials
Page 6 of 7
For Rates Effective January 1, 2024
Program Effects on Average Bill by Rate Schedule [1]


## NW Natural

Rates \& Regulatory Affairs
Bill Discount Program
Proposed Incremental Revenue Requirement Allocation by Rate Schedule - Program Effects
Based on Proposed Changes to the Temporary Fixed Customer Charge

|  |  |  | Margin Revenue at Present Rates |  | Total Revenue at Present Rates | Bill Discount Program <br> Revenue <br> Increase <br> (\$) <br> (1) |  | Bill Discount Program Impacts |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Line <br> No. | Rate <br> Schedule |  |  |  |  |  |  | Margin Revenue Increase <br> (\%) | Total Revenue Increase <br> (\%) | Average Bill Increase (\%) |
|  |  |  | A |  | B |  | C | D | E | F |
| 1 | 02R | \$ | 302,743,546 | \$ | 468,913,370 | \$ | 7,166,823 | 0.0\% | 1.5\% | 1.0\% |
| 2 | 03C | \$ | 92,803,627 | \$ | 162,351,317 | \$ | 2,266,650 | 0.0\% | 1.4\% | 0.9\% |
| 3 | 031 | \$ | 2,141,772 | \$ | 4,226,612 | \$ | 48,262 | 0.0\% | 1.1\% | 0.2\% |
| 4 | 27R | \$ | 471,508 | \$ | 796,163 | \$ | 10,905 | 0.0\% | 1.4\% | 0.9\% |
| 5 | 31CSF | \$ | 8,261,800 | \$ | 17,117,489 | \$ | 183,017 | 0.0\% | 1.1\% | 1.5\% |
| 6 | 31CTF | \$ | 981,292 | \$ | 981,292 | \$ | 23,049 | 0.0\% | 2.3\% | 1.2\% |
| 7 | 31ISF | \$ | 3,237,130 | \$ | 8,236,625 | \$ | 70,996 | 0.0\% | 0.9\% | 0.5\% |
| 8 | 31ITF | \$ | 143,836 | \$ | 143,836 | \$ | 3,321 | 0.0\% | 2.3\% | 1.0\% |
| 9 | 32CSF | \$ | 11,882,484 | \$ | 30,465,691 | \$ | 230,605 | 0.0\% | 0.8\% | 0.90\% |
| 10 | 32ISF | \$ | 2,462,192 | \$ | 8,156,582 | \$ | 53,571 | 0.0\% | 0.7\% | 0.40\% |
| 11 | 32CTF | \$ | 1,024,698 | \$ | 1,024,698 | \$ | 19,160 | 0.0\% | 1.9\% | 1.50\% |
| 12 | 32ITF | \$ | 6,584,741 | \$ | 6,584,741 | \$ | 143,055 | 0.0\% | 2.2\% | 0.70\% |
| 13 | 32 CSI | \$ | 2,232,839 | \$ | 10,222,297 | \$ | 51,064 | 0.0\% | 0.5\% | 0.10\% |
| 14 | 32ISI | \$ | 3,307,718 | \$ | 14,833,805 | \$ | 56,664 | 0.0\% | 0.4\% | 0.20\% |
| 15 | 32 CTI | \$ | 525,889 | \$ | 525,889 | \$ | 10,742 | 0.0\% | 2.0\% | 0.40\% |
| 16 | 32171 | \$ | 6,064,679 | \$ | 6,064,679 | \$ | 136,378 | 0.0\% | 2.2\% | 0.40\% |
| 17 | 33 T | \$ | 0 | \$ | 0 | \$ | 0 | 0.0\% | 0.0\% | 0.00\% |
|  | Total | \$ | 444,869,752 | \$ | 740,645,087 | \$ | $10,474,262$ <br> (2) | 0.0\% | 1.41\% | (3) |

NOTE (1): Bill Discount Program rate spread based on an equal percentage of margin basis.
NOTE (2): The proposed revenue increase is based on base charges that must be rounded to a full cent. Therefore, there may be a small discrepancy with the indicated amounts spread to each schedule as presented here and actual collections.
NOTE (3): The average customer bill percentage impact figure calculation excludes pipeline capacity charges for RS 31 and RS 32 rate classes, and thus the bill rate impa

