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January 16, 2024

NWN OPUC Advice No. 23-29A / ADV 1582

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: ADV 1582 – Energy Efficiency Program for Transportation Customers

On December 18, 2023, Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), filed NWN OPUC Advice No. 23-29, which was docketed as ADV 1582. In that filing, NW Natural proposed new tariff Schedule 361 Transportation Customer Energy Efficiency Programs and Schedule 169 Transportation Customer Energy Efficiency Programs Cost Recovery, with a requested effective date of January 24, 2024.

Due to recent events, NW Natural submits this filing to modify the requested effective date of Schedule 361 and Schedule 169 to February 29, 2024. While we do not expect any changes to the basic program design, the cost recovery proposed for the program was developed before the Oregon Climate Protection Program was ruled invalid by the Oregon Court of Appeals.¹ The additional time will allow for discussions with Commission Staff, Energy Trust and AWEC to adjust the cost recovery proposal for the program.

The enclosed proposed tariff sheets reflect the new requested effective date and replace the previous tariff sheets previously filed.

Please contact me with any questions on this filing.

Respectfully submitted,

/s/ Natasha Siores

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¹ N.W. Natural Gas Co. v. Environ. Quality Comm., 329 Or App 648 (2023).

**SCHEDULE 169
TRANSPORTATION CUSTOMER ENERGY EFFICIENCY PROGRAMS COST
RECOVERY**

(N)

PURPOSE:

This Schedule recovers the costs of the program offered under Schedule 361 "Transportation Customer Energy Efficiency Program."

APPLICABLE:

To all Customers on the Rate Schedules of this Tariff listed below:

Rate Schedule 2	Rate Schedule 3	Rate Schedule 27	Rate Schedule 31
Rate Schedule 32	Rate Schedule 33	Rate Schedule 60/60A	

APPLICATION TO RATE SCHEDULES:

Effective: February 29, 2024

The Temporary Adjustments in the applicable above-listed Rate Schedules include the adjustment shown below. NO ADDITIONAL ADJUSTMENT TO RATES IS REQUIRED.

\$0.00000 per therm

Non-Emitting-Related Rate on Schedule 60A/60: \$(0.00000) per therm

GENERAL TERMS:

This Schedule is governed by the terms of this Schedule, the General Rules and Regulations contained in this Tariff, 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.

(N)

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**SCHEDULE 361
TRANSPORTATION CUSTOMER ENERGY EFFICIENCY PROGRAM**

(N)

AVAILABLE:

In all territory served by the Company under the Tariff of which this program is a part.

PURPOSE:

This program is intended to provide an economical and effective means of conserving natural gas through energy efficiency. These programs are available to Customers with transportation service under Schedules 31, 32, and 33.

PROGRAM COSTS:

Program costs will be deferred annually and amortized for recovery coincident with the Company's Purchased Gas Adjustment through Schedule 169 of this Tariff.

SPECIAL CONDITIONS:

NW Natural is working in conjunction with the Energy Trust of Oregon to deliver energy efficiency programs to transportation customers. There are two program offerings: 1) Energy Trust of Oregon Offerings, and 2) NW Natural Offerings

Energy Trust of Oregon Offerings:

- All transportation customers will have the option to participate in Energy Trust of Oregon's Strategic Energy Management (SEM) program and leverage standard track incentive offerings. **This offering is available as of February 29, 2024.**
- Transportation customers with a five-year average annual usage under 1 million therms will be eligible for Energy Trust of Oregon's custom incentive program. **This offering is available as of July 1, 2024.**

NW Natural Offering:

- NW Natural will work with a third-party implementer to provide custom analysis for customer equipment and process improvements, sites will also be screened for suitability for hydrogen use and/or post combustion carbon capture. Cost effective energy efficiency projects will be eligible for incentives. Transportation customers with annual usage greater than 1 million therms will be eligible for this program. **This offering is available as of July 1, 2024.**

The threshold of one million therms will be determined based on a five-year average. When a customer's usage is within five percent of the threshold (50,000 therms), the customer will be able to choose which program to participate in.

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 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.

(N)

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NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

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