## VIA ELECTRONIC FILING

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

## Re: REPLACEMENT FILING <br> REQUEST FOR INCLUSION OF COSTS ASSOCIATED WITH RENEWABLE NATURAL GAS INVESTMENTS: Schedule 198 - Renewable Natural Gas Adjustment Mechanism

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), files herewith revisions and additions to its Tariff, P.U.C. Or. $25,{ }^{1}$ stated to become effective with service on and after November 1, 2023, as follows:

| First Revision of Sheet 198-1 | Schedule 198 | Renewable Natural Gas Adjustment Mechanism |
| :--- | :--- | :--- |

This filing replaces, in its entirety, the tariff sheet and Exhibit A originally filed under NWN OPUC Advice No. 23-20 (UG 487), dated July 31, 2023. The purpose of this replacement filing is to revise a deferral calculation and add a non-combustion-related rate.

## Purpose

The purpose of this filing is to recover the forecasted revenue requirement, true-up deferral from last year's forecast and the sharing deferral from the Company's Lexington renewable natural gas project. After discussions with the Oregon Citizens' Utility Board, the Company has revised the deferral calculation for the Lexington Project Surcharge from the previous Advice filing. The Company is also including a non-combustion-related rate in the Schedule 198 tariff for customers whose usage is not subject to Climate Protection Program compliance.

## Background:

This filing is in compliance with ORS 757.259, which authorizes deferred utility expenses or revenues to be allowed (amortized) in rates to the extent authorized by the Public Utility Commission of Oregon ("Commission") in a proceeding to change rates. The Schedule 198 automatic adjustment clause was authorized by the Commission in the Company's last general rate case, UG 435, under Order No. 22-388.

[^0]
## Proposed Changes

In accordance with OAR 860-022-0025 and 0030, the Company states that the effect of this tariff adjustment schedule is to increase the Company's annual revenues by $\$ 1,054,645$ or about . $12 \%$. The monthly increase for the average Rate Schedule 2 residential customer using 56 therms is $\$ 0.16$, or $0.1 \%$. The monthly increase for the average Rate Schedule 3 commercial customer using 255 therms is $\$ 0.64$, or $0.2 \%$, the monthly increase for the average Rate Schedule 27 customer using 44 therms is $\$ 0.10$, or $0.1 \%$ and the monthly increase for the average commercial Rate Schedule 31 firm sales customer using 2,816 therms is about $\$ 7.03$, or $0.2 \%$. The average industrial Rate Schedule 32 firm sales customer using 18,823 therms will see a monthly increase of about $\$ 46.88$, or $0.3 \%$. Work papers supporting the rate and bill impact calculations will be separately submitted in electronic format.

The number of customers affected by the proposed change is 636,785 residential customers, and 62,829 commercial and industrial customers.

## Conclusion

In support of this filing, the Company includes supporting materials as part of this filing and will separately submit work papers in electronic format, all of which are incorporated herein by reference.

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

Please address correspondence on this matter to Lora Bourdo at lora.bourdo@nwnatural.com with copies to the following:

eFiling<br>Rates \& Regulatory Affairs<br>NW Natural<br>250 SW Taylor Street<br>Portland, Oregon 97204<br>Fax: (503) 220-2579<br>Telephone: (503) 610-7330<br>eFiling@nwnatural.com

Sincerely,
NW NATURAL
/s/ Kyle Walker, CPA
Kyle Walker, CPA
Rates/Regulatory Senior Manager
Attachment: Exhibit A - Supporting Materials

# SCHEDULE 198 <br> RENEWABLE NATURAL GAS ADJUSTMENT MECHANISM 

## PURPOSE:

The purpose of this Schedule is to identify adjustments to rates in the Rate Schedules listed below for the recovery of the revenue requirement of qualified investments, as defined by ORS 757.392(5), in renewable natural gas (RNG) infrastructure.

This adjustment mechanism will recover the revenue requirement associated with the prudently incurred qualified investments that contribute to the Company meeting the targets set forth in ORS 757.396. For purposes of this Schedule, "qualified investment" has the meaning given that term in ORS 757.392. This Adjustment Schedule is implemented as an automatic adjustment clause as provided for under ORS 757.210 and Oregon Senate Bill 98 (2019) codified as ORS 757.396.

## APPLICABLE:

To All Customers on the Rate Schedules of this Tariff listed below:
Rate Schedule $2 \quad$ Rate Schedule $31 \quad$ Rate Schedule 60A/60
Rate Schedule $3 \quad$ Rate Schedule 32

## Application to Rates:

Non-Combustion-Related Rate on Schedule 60A/60: \$(0.00152) per therm

The per-therm Base Adjustment in the applicable Rate Schedules include the following adjustment:

|  | All Customers | Effective Date: |
| :--- | :---: | :---: |
| Schedule 198 amortization | $\$ 0.00249$ | November 1, 2023 |

(continue to Sheet 198-2)

Effective with service on and after November 1, 2023

# BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON 

NW NATURAL SUPPORTING MATERIALS

Inclusion of Costs Associated with<br>Renewable Natural Gas Investments

NWN OPUC Advice No. 23-20A / UG 487
September 14, 2023

## NW NATURAL

## EXHIBIT A

## Supporting Materials <br> Inclusion of Costs Associated with Renewable Natural Gas Investments

## NWN OPUC ADVICE NO. 23-20A / UG 487

Description PageCalculation of Increments Allocated on Equal Cent per Therm Basis1
Effects on Average Bill by Rate Schedule ..... 2
Basis for Revenue Related Costs ..... 3
PGA Effects on Revenue ..... 4
Summary of Renewables Deferred Accounts Included in the PGA ..... 5
151928 Lexington RNG Project Surcharge ..... 6
151930 RNG Adjustment Mechanism Deferral ..... 7
151931 RNG Investment Deferral - Lexington Sharing ..... 8
Determination of Cost of Service ..... 9




## NW Natural <br> Rates and Regulatory Affairs <br> 2023-2024 PGA Filing - OREGON <br> Basis for Revenue Related Costs



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NW Natural
Rates & Regulatory Affairs
2023-2024 PGA Filing - Oregon: September Filing
PGA Effects on Revenue
UG 487: Renewable Natural Gas Adjustment Mechanism
```

|  | Including Revenue Sensitive Amount |
| :---: | :---: |
| Permanent Increments |  |
| Removal of Current Permanent Increments |  |
| Schedule 198 Amounts | (\$1,719,294) |
| Addition of Proposed Permanent Increments |  |
| Schedule 198 Amounts | 2,773,939 |
| TOTAL OF ALL COMPONENTS OF RATE CHANGES | \$1,054,645 |
| 2022 Oregon Earnings Test Normalized Total Revenues | \$849,278,042 |
| Effect of this filing, as a percentage change (line $11 \div$ line 14) | 0.12\% |

## NW Natural

## Rates \& Regulatory Affairs

2023-2024 PGA Filing - September Filing
Summary of Renewables Deferred Accounts Included in the PGA

|  | Account | $\begin{gathered} \text { Balance } \\ 6 / 30 / 2023 \\ \hline \end{gathered}$ | Jul-Oct Estimated Activity |  | Jul-Oct <br> Interest | $\begin{gathered} \text { Estimated } \\ \text { Balance } \\ 10 / 31 / 2023 \\ \hline \end{gathered}$ | Interest Rate During Amortization | Estimated Interest During Amortization | Estimated Amount for (Refund) or Collection |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | A | B | C |  | D | E | F1 | F2 | G |  |
|  |  |  |  |  |  | $E=\operatorname{sum} B$ thru $D$ | 5.13\% |  | $\mathrm{G}=\mathrm{E}+\mathrm{F} 2$ |  |
| 7 | RENEWABLES ADJUSTMENT MECHANISM DEFERRALS |  |  |  |  |  |  |  |  |  |
| 8 |  |  |  |  |  |  |  |  |  | Amortized over 3 years |
| 9 | 151928 LEXINGTON PROJECT SURCHARGE | 0 |  | 0 | 0 | 1,367,852 | 5.13\% | 38,306 | 1,406,158 | 468,719 per Order 22-437 |
| 10 |  |  |  |  |  |  |  |  |  |  |
| 11 | 151930 RNG ADJUSTMENT MECHANISM DEFERRAL |  |  |  |  |  |  |  |  |  |
| 12 | Sales Customers | 224,351 |  | 0 | 5,156 | 229,507 |  |  |  |  |
| 13 | Transportation Customers | 96,604 |  | 0 | 2,220 | 98,824 |  |  |  |  |
| 14 | Special Contract Customers | 41,395 |  | 0 | 951 | 42,346 |  |  |  |  |
| 15 | Total | 362,349 |  | 0 | 8,328 | 370,677 | 5.13\% | 10,381 | 381,058 |  |
| 16 |  |  |  |  |  |  |  |  |  |  |
| 17 | 151931 LEXINGTON MECHANISM SHARING |  |  |  |  |  |  |  |  |  |
| 18 | Sales Customers | $(128,783)$ |  | 0 | $(2,960)$ | $(131,743)$ |  |  |  |  |
| 19 | Transportation Customers | $(20,705)$ |  | 0 | (476) | $(21,181)$ |  |  |  |  |
| 20 | Special Contract Customers | 0 |  | 0 | 0 | 0 |  |  |  |  |
| 21 | Total | $(149,488)$ |  | 0 | $(3,436)$ | $(152,924)$ | 5.13\% | $(4,283)$ | $(157,207)$ |  |



| Company: | Northwest Natural Gas Company |
| :--- | :--- |
| State: | Oregon |
| Description: | RNG Adjustment Mechanism Deferral |
| Account Number: | 151930 |
| Docket: | UG 435, Order 22-388 |


| Month/Year |  | Rates | Deferral | Transfers | Interest Rate | Interest |
| ---: | :---: | :---: | :---: | :---: | :---: | :---: |


| Company: |  | Northwest Natural Gas Company |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| State: |  | gon |  |  |  |  |  |
| Description: |  | RNG Investment Deferral - Lexington Sharing |  |  |  |  |  |
| Account Num |  | 151931 |  |  |  |  |  |
| Docket: |  | UI 452, Order 22-211 |  |  |  |  |  |
| Month/Year | Rates | Deferral | Transfers | Interest Rate | Interest | Activity | Balance |
| (a) | (b) | (c) | (d) | (e) | (f) | (g) | (h) |
| Beginning Balance |  |  |  |  |  |  |  |
| Nov-22 |  | $(6,025.77)$ |  | 6.836\% | (17.16) | $(6,042.93)$ | $(6,042.93)$ |
| Dec-22 |  | $(19,279.27)$ |  | 6.836\% | (89.34) | (19,368.61) | $(25,411.54)$ |
| Jan-23 |  | 0.00 |  | 6.836\% | (144.76) | (144.76) | $(25,556.30)$ |
| Feb-23 |  | 0.00 |  | 6.836\% | (145.59) | (145.59) | $(25,701.89)$ |
| Mar-23 |  | $(50,959.75)$ |  | 6.836\% | (291.57) | (51,251.31) | $(76,953.20)$ |
| Apr-23 |  | 0.00 |  | 6.836\% | (438.38) | (438.38) | $(77,391.58)$ |
| May-23 |  | 0.00 |  | 6.836\% | (440.87) | (440.87) | $(77,832.45)$ |
| Jun-23 |  | $(71,010.39)$ |  | 6.836\% | (645.65) | $(71,656.03)$ | $(149,488.48)$ |
| Jul-23 |  |  |  | 6.836\% | (851.59) | (851.59) | $(150,340.07)$ |
| Aug-23 |  |  |  | 6.836\% | (856.44) | (856.44) | $(151,196.51)$ |
| Sep-23 |  |  |  | 6.836\% | (861.32) | (861.32) | $(152,057.82)$ |
| Oct-23 |  |  |  | 6.836\% | (866.22) | (866.22) | $(152,924.05)$ |
|  |  | $(147,275.17)$ |  |  | $(5,648.87)$ |  |  |
|  |  | Sales | Transportation | Sp. Contracts |  |  |  |
|  |  | (21,800.15) | $(3,504.89)$ |  |  |  |  |
|  |  | $(43,901.54)$ | $(7,058.21)$ |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  | $(61,175.05)$ | $(9,835.34)$ |  |  |  |  |
|  |  | $(126,876.74)$ | (20,398.44) | - | $(147,275.18)$ |  |  |
|  |  | $86.15 \%$ | 13.85\% |  |  |  |  |
| Intere | allocation | $(1,907)$ | (307) | - |  |  |  |
|  | 23 balance | $(128,783)$ | $(20,705)$ | - | $(149,488)$ |  |  |
| July - Oct | 23 interest | $(2,960)$ | (476) | - |  |  |  |
| 10/3 | 23 balance | $(131,743)$ | $(21,181)$ | - | $(152,924)$ |  |  |

NW Natural
Determination of Cost of Service
UG 487 - Schedule 198 - Lexington RNG Year 2 Cost of Service

|  | Year 2 |
| :---: | :---: |
| Depreciation | 324,878 |
| O\&M | 905,109 |
| Property Taxes | 127,126 |
| Taxes on Equity Return |  |
| State and Federal Income Taxes | 142,608 |
| Total Taxes | 142,608 |
| Return on Rate Base |  |
| Debt and Equity Return | 518,272 |
| Total Return | 518,272 |
| Subtotal Cost of Service | 2,017,993 |
| Revenue Sensitive Items | 56,882 |
| Total Cost of Service - Annual | \$2,074,875 |


| Combined Overall Tax Rate (OR \& Fed) | 27.004\% |  |
| :---: | :---: | :---: |
| Property Tax Rate | 1.500\% |  |
| Franchise Taxes | 2.299\% |  |
| Commission Fee | 0.430\% | 2.819\% '--> (rev sens rate) |
| Uncollectible Rate | 0.090\% |  |
|  | Capital Structure | Rates Post-Tax |
| Long-Term Debt | 50.000\% | 4.271\% 2.136\% |
| Common Equity | 50.000\% | 9.400\% $4.700 \%$ |
| ROR |  | 6.836\% |
| Bonus Depreciation? <br> Non-Bonus | $\begin{array}{r}0 \% \\ 100 \% \\ \hline\end{array}$ | --> At 0\%, no bonus depreciation. |


[^0]:    ${ }^{1}$ Tariff P.U.C. Or. 25 originated November 1, 2012 with docket UG 221; Order No. 12-408 as supplemented by Order No. 12-437 and was filed in accordance with ORS 767.205 and OAR 860-022-0005.

