

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1798(9)

In the Matter of

NORTHWEST NATURAL GAS  
COMPANY, dba NW NATURAL,

Request for Reauthorization to Defer  
Certain Expenses or Revenues Associated  
with the Weather Adjusted Rate  
Mechanism (WARM).

ORDER

**DISPOSITION: STAFF'S RECOMMENDATION ADOPTED**

At its public meeting on January 20, 2026, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



**Alison Lackey**  
Chief Administrative Law Judge



A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. CA5

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: January 20, 2026**

**REGULAR** \_\_\_\_\_ **CONSENT**   X   **EFFECTIVE DATE** \_\_\_\_\_ **N/A**

**DATE:** December 22, 2025

**TO:** Public Utility Commission

**FROM:** Kathy Zarate

**THROUGH:** Scott Gibbens and Michelle Scala **SIGNED**

**SUBJECT:** NORTHWEST NATURAL:  
(Docket No. UM 1798(9))  
Request reauthorization to Defer Certain Expenses associated with the  
Weather Adjusted Rate Mechanism, Schedule 195.

**STAFF RECOMMENDATION:**

Approve Northwest Natural's (NWN or Company) reauthorization request to defer costs associated with Schedule 195 Weather Adjusted Rate Mechanism (WARM), for the 12-month period beginning November 1, 2025.

**DISCUSSION:**

Issue

Whether the Commission should approve NW Natural's requests for reauthorization to defer costs associated with Schedule 195, Weather Adjusted Rate Mechanism.

Applicable Law

In accordance with ORS 757.259(2), utilities may seek approval to defer amounts for later inclusion in rates to minimize the frequency of rate changes or to appropriately match customer benefits and costs. OAR 860-027-0300(4) requires the utility to provide certain information in an application to defer, such as the reason for the deferral and the estimated amount of the deferral.

ORS 757.259(2)(e) specific amounts eligible for deferred accounting treatment with interest authorized by the Commission include identifiable utility expenses or revenues,

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the recovery or refund of which the commission finds should be deferred in order to minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately the costs borne by and benefits received by ratepayers.

In OAR 860-027-0300(3), the Commission has set forth the requirements for the contents of deferred accounting applications. Applications for reauthorization must include that information along with a description and explanation of the entries in the deferred account to the date of the application for reauthorization and the reason for continuation of deferred accounting.

OAR 860-027-0300(4). Notice of the application must be provided pursuant to OAR 860-027-0300(6). Unless subject to an automatic adjustment clause under ORS 757.210(1), amounts deferred under ORS 757.259(5) may be subject to an earnings review of the utility's earnings. With some exceptions, a company's amortization of amounts deferred under ORS 757.259(5) cannot exceed an amount equal to three percent of the company's gross revenues from the preceding year. ORS 757.259(6).

OAR 860-027-0300(a), "Amortization" means the inclusion in rates of an amount which has been deferred under ORS 757.259 (Amounts includable in rate schedule) or ORS 759.200 (Inclusion of amortizations in rates) and which is designed to eliminate, over time, the balance in an authorized deferred account.

Amortization does not include the normal positive and negative fluctuations in a balancing account. OAR 860-027-0300(b) "Deferred Accounting" means recording the following in a balance sheet account, with Commission authorization for later reflection in rates.<sup>1</sup>

### Analysis

#### *Background*

The Company submitted this application for the 12-month period from November 1, 2025 through October 31, 2026 for amounts associated with Schedule 195, Weather adjusted rate mechanism (WARM.)

The Company made changes to the WARM program consistent with Order No. 16-223, that impacted residential and commercial customer bills as follows.

- Residential Bills, the maximum WARM adjustment surcharge that will be applied to a monthly bill during the WARM Period will be twelve dollars (\$12.00), or

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<sup>1</sup> In Order No. 16-223, the Commission approved a stipulation setting requirements for operation of NWN's WARM program, including deferred accounting.

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twenty-five percent (25 percent) of the usage portion of that bill, whichever is less<sup>2</sup>.

- Commercial Bills, the maximum WARM adjustment surcharge that will be applied to a monthly bill during the WARM Period will be thirty-five dollars (\$35.00), or twenty-five percent (25 percent) of the usage portion of that bill, whichever is less. The maximum WARM adjustment credit applied to a monthly bill during the WARM Period will be thirty-five dollars (\$35.00), or twenty-five percent (25 percent) of the usage portion of that bill.

In addition, any amounts not applied to a customer's bill during the WARM Period due to the cap and floor described above will be deferred in a residential or commercial deferral account and then amortized on an equal cent per therm basis through the annual Purchased Gas Adjustment (PGA).

#### *Description of Expenses*

The Company seeks continued deferred amounts that are not utilized for customer bills during the WARM Period due to the monthly cap and floor in accordance with the Order 16-5 223.

#### *Proposed Accounting*

Beginning on November 1, 2025, and ending 12 months from this date, the Company proposes to account for the WARM deferral amounts by recording the deferral in Account 186 in two separate accounts (residential and commercial).

#### *Reasons for Deferral*

ORS 757.259(2)(e) allows the deferral of utility expenses or revenues where necessary to match appropriately the costs borne by and benefits received by customers.

#### *Estimate of Amounts*

The Company cannot estimate what amounts will be recorded in WARM. However, last years on residential and commercial accounts were (\$5,845,715.77) and (\$3,573,891.22), respectively.<sup>3</sup> The activity in these accounts are outside the adjustment caps set in Order No. 16-223.

#### *Information Related to Future Amortization*

- Earnings Review - ORS 757.259(5) requires the Commission to review the utility's earnings at the time of application to amortize the deferral for amounts

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<sup>2</sup> See, PDF page 9 of the order ([16-223.pdf](#)).

<sup>3</sup> See, Exhibit A to the Northwest Natural's application in Docket No. UM 1798.

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deferred pursuant to ORS 757.259(2)(e). Because this deferral is an automatic adjustment clause, there is no earnings test required.

- Earning Test - The deferred amounts will not be subjected to an earnings test due to the WARM mechanism design, purpose, and historical treatment.
- Prudence Review - Prior to amortization, a prudence review will be conducted. The review should include verification of the accounting methodology used to determine the final amortization balance.
- Sharing - Staff believes the Commission did not authorize, and Staff does not recommend sharing between NW Natural and its customers for this deferral.
- Rate Spread/Design - The Order established that any amounts not applied to a customer's bill during the WARM Period due to the cap and floor described above will be deferred in a residential or commercial deferral account and then amortized on an equal cent per therm basis through the annual Purchased Gas Adjustment process to rate schedules 2 and 3 customers, respectively, over the 12 month period November 1 through October 31 of each year.
- Three Percent Test (ORS 757.259(6)) - The three percent test measures the annual overall average effect on customer rates resulting from deferral amortizations. The three percent test limits the aggregated deferral amortizations during a 12-month period to no more than three percent of the utility's gross revenues for the preceding year, subject to exceptions at ORS 757.259(7), (8), and (10). This deferral falls under the exception in ORS 757.259(7).

### Conclusion

Staff concludes that the proposed reauthorization represents an appropriate use of deferred costs associated with schedule 195 Weather Adjusted Rate Mechanism and should be approved.

Additionally, NW Natural's application for reauthorization of deferred accounting meets the requirements related to the establishment of the PGA mechanism as well as the requirements of ORS 757.259 and OAR 860-027-0300.

The Company has reviewed this memo and has stated no objection.

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**PROPOSED COMMISSION MOTION:**

Approve NW Natural's application and re-authorization to defer costs associated with Schedule 195 Weather Adjusted Rate Mechanism, for the 12-month period beginning November 1, 2025.