

September 16, 2025

NWN OPUC Advice No. 25-04A

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 1775 / NWN OPUC Advice No. 25-04A: Schedule 351 – Thermostat Rewards Program and Schedule 121 – Thermostat Rewards Program Cost Recovery

On July 29, 2025, Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), filed with the Public Utility Commission of Oregon (Commission) Advice No. 25-04, docketed as ADV 1775 to propose new tariff Schedule 351 and Schedule 121 related to its Thermostat Rewards Program, with a requested effective date of September 17, 2025.

After discussion with Commission Staff, NW Natural submits this tariff replacement filing to provide additional information in Schedule 351 related to the program incentives and enrollment. To accommodate this revision, NW Natural respectfully requests a revised effective date of October 29, 2025. The enclosed proposed tariff sheets reflect the new proposed effective date of October 29, 2025, and replace the previous tariff sheets filed in this docket in their entirety along with new proposed Sheet 351-2. Note that only Schedule 351 includes a revision as described above; the details of the enclosed remaining tariff sheets remain unchanged but for the new effective date and addition of Sheet 351-2.

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

eFiling
NW Natural Rates & Regulatory Affairs
250 SW Taylor Street
Portland, OR 97204
Phone: (503) 610-7330
Email: eFiling@nwnatural.com

Respectfully submitted,

/s/ Rebecca Trujillo

Rebecca Trujillo
NW Natural
Regulatory Consultant
250 SW Taylor Street
Portland, OR 97204
Phone: (503) 610-7326
Email: rebecca.trujillo@nwnatural.com

NORTHWEST NATURAL GAS COMPANY

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SCHEDULE 121
THERMOSTAT REWARDS PROGRAM COST RECOVERY

PURPOSE:

This Schedule recovers the costs of the bring-your-own thermostat program offered under Schedule 351– Thermostat Rewards Program

APPLICABLE:

To all Residential and Small Commercial Customers on the Rate Schedules of this Tariff listed below, allocated on the basis of equal percentage of margin:

Residential	Small Commercial
Rate Schedule 2	Rate Schedule 3 CSF

APPLICATION TO RATE SCHEDULES:

Effective: October 29, 2025

The Total Adjustment amount shown below is included in the Temporary Adjustments reflected in the listed Rate Schedules. NO ADDITIONAL ADJUSTMENT TO RATES IS REQUIRED

Schedule	Rate Adjustment per therm
2	\$0.00000
03 CSF	\$0.00000

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.

**SCHEDULE 351
THERMOSTAT REWARDS PROGRAM**

(N)

PURPOSE:

To describe NW Natural's Thermostat Rewards Program.

AVAILABLE:

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

Rate Schedule 2

Rate Schedule 3

PARTICIPATING SMART THERMOSTAT MANUFACTURERS:

NW Natural will work with various providers of thermostats and the list may change from time to time. The current brands we are working with can be found on NW Natural's website:

<https://www.nwnatural.com/thermostatrewards>

PROGRAM COSTS AND TERMS:

Program costs will be deferred annually and amortized for recovery coincident with the Company's Purchased Gas Adjustment filings, or as otherwise approved by the Commission, through Schedule 121.

CONDITIONS:

1. Participants must be a NW Natural Residential or Small Commercial customer and be an authorized user on the account and use a natural gas forced air furnace for space heating.
2. An eligible smart thermostat must be installed and connected to Wi-Fi prior to enrollment.

INCENTIVES:

The incentives are as follows:

- Upon acceptance of the customer's enrollment, a \$25 gift card will be provided.
- In addition, if the customer participates in at least 50 percent of all event hours and remains enrolled on March 31 (the last day of the season) a \$25 gift card will be provided.

REPORTING

NW Natural will report results of this program annually, including customer participation rates per event broken down by the smart thermostat brand customers use, incentive payouts, and event details such as duration.

ENROLLMENT AND PROGRAM DETAILS:

Customers can sign-up via NW Natural's website or through their smart thermostat's application or website.

During a Demand Response Event, the Participant's thermostat will automatically lower the temperature setpoint by two to four degrees at their home or business. At the end of an Event, the Participant's thermostat will return to its original settings.

There may be multiple events during the winter season from November 1 to March 31. Program Events during the winter season will typically last up to four hours. Events will usually occur between 7:00 AM and 11:00 AM with an event duration of no more than four hours. Some events may be preceded by pre-heating prior to the start of an event

Participants may opt out of any event before it begins. Participants can also opt out during an Event by manually adjusting their thermostat to the desired temperature. Participants may also disenroll/opt out of the Program at their discretion anytime.

NW Natural or its vendor have the right to make changes to the terms and conditions of the Program, the vendor, or the vendor's agreements from time to time without requiring advance notice or the participants' consent. Notice of any such changes will be provided by updates available on NW Natural's website at the link provided above.

(continue to Sheet 351-2)

(N)

SCHEDULE 351
THERMOSTAT REWARDS PROGRAM
(continued)

ENROLLMENT AND PROGRAM DETAILS (continued):

NW Natural reserves the right to terminate any participant from enrollment in the Program at any time based upon level of participation (such as being offline for prolonged periods or for lack of participation) or for any other reason without liability or responsibility. Notice will be provided to participant after the participant has been removed from the Program.

Additional program details including Terms and Conditions are available on the program website:

<https://www.nwnatural.com/thermostatrewards>

GENERAL:

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)

(N)