

December 15, 2025

NWN OPUC Advice No. 25-26

VIA ELECTRONIC FILING

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

Re: February 2026 Bill Adjustments – Schedule 185 Special Annual Interstate and Intrastate Storage and Transportation Credit; and Schedule 186 Special Annual Core Pipeline Capacity Optimization Credit

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following tariff sheets stated to become effective with service on and after February 1, 2026:

Seventeenth Revision of Sheet 185-1	Schedule 185	Special Annual Interstate and Intrastate Storage and Transportation Credit
Seventeenth Revision of Sheet 186-1	Schedule 186	Special Annual Core Pipeline Capacity Optimization Credit

Purpose

The purpose of this filing is to revise Schedule 185 and Schedule 186, respectively, to reflect the per-therm credit used to calculate the lump sum amount to be applied to the bills customers served under Rate Schedules 2, 3, and under the Sales Service option of Schedules 31 and 32.

Background

Schedules 185 and 186 establish a bill credit (optimization credit) based on Oregon's share of revenue received by the Company for: a) interstate storage and related transportation services provided, b) core storage optimization activities, c) intrastate storage activities under Schedules 80 and 91, and d) optimization of core customer pipeline and storage capacity. In the Company's 2020 rate case, the stipulating parties agreed to change the delivery of this credit, which had historically been provided in June, to February. The lump sum February bill credit will be applied to customer bills commencing with the first billing cycle in February 2026 and ending in the last billing cycle in February 2026.

The bill credits will be calculated based on the customer's actual billed gas usage for the period November 1, 2024 through October 31, 2025. In order to receive the bill credits, a customer must have an active gas service account at the time of the customer's February 2026 billing cycle.

Schedule 185

The Schedule 185 credits represent the credit of the Oregon share of revenues NW Natural received for interstate storage and related transportation service activities under a Limited

Jurisdiction Blanket Certificate granted under FERC Regulations, 18 C.F.R. 294.224, core storage optimization activities, and intrastate storage activities under Schedules 80 and 91. The credit of \$8,088,312 (before revenue sensitive effects) is comprised of \$7,993,832 from revenues for November 2024 through October 2025 activity, plus \$94,480 that is the residual remaining balance from the winter 2025 credits.

Schedule 185 amounts are calculated on an equal percentage of margin basis. The Schedule 185 credits will reduce February 2026 customer bills for average customer usage from the November 2024 through October 2025 period indicated as follows:

- The average Schedule 2 Residential Customer that used about 568 therms will see a bill credit of about \$9.18.
- The average Schedule 3 Commercial Customer that used about 3,007 therms will see a bill credit of about \$36.74.
- The average Schedule 31 Commercial Firm Sales customer that used about 31,339 therms will see a bill credit of about \$214.70.
- The average Schedule 32 Industrial Firm Sales customer that used about 190,492 therms will see a bill credit of about \$246.17.

Schedule 186

This filing also revises Schedule 186 to add the per-therm credits that will be credited for the Oregon share of revenues received from the Company's core pipeline and storage capacity optimization activities. The credit of \$15,067,680 (before revenue sensitive effects) is comprised of \$14,891,673 from revenues for November 2024 through October 2025 activity, plus \$176,007 that is the residual remaining balance from the winter 2025 credits.

The Schedule 186 credits apply across all sales-based rate schedules and is a credit of \$0.02277 per therm. The average February 2025 bill credit under Schedule 186 is as follows:

- Schedule 2 Residential \$12.93
- Schedule 3 Commercial \$68.46
- Schedule 31 Commercial Firm \$713.59
- Schedule 32 Industrial Firm Sales \$4,337.50
- Schedule 32 Industrial Interruptible Sales \$7,552.33

Combined Effects

In compliance with OAR 860-022-0025 NW Natural states that the combined effects of the Schedule 185 and Schedule 186 amounts is a credit to customers of \$23,155,992 (before revenue sensitive effects), which is comprised of \$22,885,505 from revenues for November 1, 2024 through October 31, 2025 activity plus \$270,487 that is the residual remaining balance from the winter 2025 credits. As mentioned above, these credits will be provided to those customers with actual billed gas usage for the period November 1, 2024 through October 31, 2025, and have an active gas service account at the time of the customer's February 2026 billing cycle, therefore the number of customers affected is not known at this time. However, the number of customers expected to be affected is provided on page 1 of the enclosed Exhibit A.

The average bill effects of the Schedule 185 and Schedule 186 credits combined for the February time period are as follows:

- The average Schedule 2 Residential customer will see a bill credit of about \$22.11.
- The average Schedule 3 Commercial customer will see a bill credit of about \$105.20.
- The average Schedule 31 Commercial Firm Sales customer will see a bill credit of about \$928.29.
- The average Schedule 32 Industrial Firm Sales customer will see a bill credit of about \$4,583.66.
- The average Schedule 32 Industrial Interruptible Sales customer will see a bill credit of about \$7,552.33.

Conclusion

The Company respectfully requests that the tariff sheets filed herein be approved to become effective with service on and after February 1, 2026.

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.

The Company waives paper service in this proceeding.

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

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Rates & Regulatory Affairs
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Sincerely,

/s/ Kyle Walker

Kyle Walker, CPA
Senior Manager, Rates and Regulatory Affairs

Attachments

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Seventeenth Revision of Sheet 185-1
Cancels Sixteenth Revision of Sheet 185-1**SCHEDULE 185
SPECIAL ANNUAL INTERSTATE AND INTRASTATE
STORAGE AND TRANSPORTATION CREDIT****PURPOSE:**

To credit customers served under the below-listed Rate Schedules for the Oregon share of revenues received by NW Natural for (a) interstate storage and related transportation service provided under a Limited-Jurisdiction Blanket Certificate from FERC granted under FERC Regulations, 18 C.F.R. § 284.224 (hereafter referred to as § 284.224 service), (b) core storage optimization activities; and (c) intrastate storage activities under **Rate Schedule 80** and **Rate Schedule 91**.

APPLICABLE:

The credit under this Schedule shall apply to customer bills issued during the February billing cycle of each calendar year, or such other time period as the Commission may approve. The credit shall apply to the following Sales Service Rate Schedules of this Tariff: **Schedule 2, Schedule 3, and; Schedules 31 and 32 – Firm Sales only.**

CREDIT: Effective Billing Cycles: February 2026

The bill credit to be applied to Customer bills during the effective billing cycle will be calculated by multiplying the following per therm credit by the customer's actual gas usage billed during the period November 1, 2024 through October 31, 2025:

Rate Schedule/Class	Block	Temporary Adjustments		Schedule	Block	Temporary Adjustments
2		\$(0.01616)				
03 CSF		\$(0.01222)				
03 ISF		\$(0.00781)				
31 CSF	Block 1	\$(0.00745)		31 ISF	Block 1	\$(0.00523)
	Block 2	\$(0.00681)			Block 2	\$(0.00473)
32 CSF	Block 1	\$(0.00454)		32 ISF	Block 1	\$(0.00303)
	Block 2	\$(0.00386)			Block 2	\$(0.00258)
	Block 3	\$(0.00271)			Block 3	\$(0.00182)
	Block 4	\$(0.00157)			Block 4	\$(0.00106)
	Block 5	\$(0.00074)			Block 5	\$(0.00054)
	Block 6	\$(0.00035)			Block 6	\$(0.00027)

(continue to Sheet 185-2)

Issued date December 15, 2025
NWN OPUC Advice No. 25-26Effective with service on
and after February 1, 2026

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Seventeenth Revision of Sheet 186-1
Cancels Sixteenth Revision of Sheet 186-1

SCHEDULE 186 SPECIAL ANNUAL CORE PIPELINE CAPACITY OPTIMIZATION CREDIT

PURPOSE:

To credit Sales Service Customers served under the below-listed Rate Schedules for the Oregon share of revenues received by NW Natural for the optimization of core customer Pipeline and Storage capacity.

APPLICABLE:

This credit shall apply to customer bills issued during the February billing cycle of each calendar year, or such other time period as the Commission may approve. The credit shall apply to the following Sales Service Rate Schedules of this Tariff:

Rate Schedule 2
Rate Schedule 31

Rate Schedule 3
Rate Schedule 32

CREDIT: **Effective Billing Cycle: February 2026**

The bill credit to be applied to Customer bills during the effective billing cycle will be calculated by multiplying the following per therm credit by the customer's actual gas usage billed during the period November 1, 2024 through October 31, 2025:

(\$0.02277)

(C)

(C)

(C)

SPECIAL CONDITIONS:

1. NW Natural will share with customers served under the Rate Schedules listed above, the amount of net margin revenue that is attributable to optimization of core customer Pipeline and Storage capacity on an 90/10 basis; 10% will be retained by NW Natural, and 90% will be shared with customers through the credit provided for in this Schedule. For this purpose, net margin is defined as revenues less incremental operating and maintenance (O&M) expense.
2. The annual credit shall be based on the net margin as described in paragraph 1 above, and as filed with the Commission. This credit shall be applied to customers' bills, or placed in an interest bearing deferred account, on February 1 of each year, or at a date other than February 1 for reasons and on terms as the Commission may approve.
3. If the net margin for the year is negative (a loss) then the credit will be zero.
4. As provided under "OUT-OF-CYCLE TRANSFERS" provision set forth in Rate Schedules 31 and 32 a Customer that exercises the Capacity Release Option may only be eligible to receive one-half of the above-listed credit.

PRIOR YEAR BALANCES:

The Company will include any remaining balance from the prior year's credit in the calculation of the current year's credit.

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.

Issued date December 15, 2025
NWN OPUC Advice No. 25-26

Effective with service on and
after February 1, 2026

EXHIBIT A

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

NW NATURAL SUPPORTING MATERIALS

NWN OPUC Advice No. 25-26, ADV ____

December 15, 2025

NW NATURAL

EXHIBIT A

Supporting Materials

NWN'S OPUC ADVICE NO. 25-26 / ADV _____

Description	Page
Effects on Average February Bill by Rate Schedule	1
Calculation of Increments Allocated on the Equal Percentage of Margin Basis	2
Calculation of Increments Allocated on the Equal Cent Per Therm Basis	3
Interstate Storage Services & Optimization 2024-25	4

67	Totals	682,417,310	689,175
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NW Natural

Rates & Regulatory Affairs

Oregon Schedule 185 and Schedule 186 Credit for November 2024 - October 2025 Storage Activity

Calculation of Increments Allocated on the EQUAL PERCENTAGE OF MARGIN BASIS

ALL VOLUMES IN THERMS

2025-2026 PGA Rates & UG 520 Rates										Schedule 185 Credits		
2025										Proposed Amount:	(\$8,088,312) Temporary Increment	
										Revenue Sensitive Multiplier:	3.018% rev sensitive factor is built in	
										Amount to Amortize:	(\$8,340,014) All Sales 2, 3, 31, & 32 Firm Sale	
Schedule	Block	A	B	C	D	E=B-C-D	F = E * A	G	H	I = F + G*H	Multiplier	Allocation to RS
											J	K
												L
2R		358,526,997	\$1.41220	\$0.53478	\$0.03419	\$0.84323	\$302,320,719	\$9.78	631,243	\$376,416,751	1.0	(\$5,793,895)
3C Firm Sales		168,117,721	\$1.23970	\$0.53478	(\$0.02887)	\$0.73379	\$123,363,103	\$15.00	55,917	\$133,428,163	1.0	(\$2,053,758)
3I Firm Sales		4,676,197	\$1.08572	\$0.53478	\$0.05646	\$0.49448	\$2,312,286	\$15.00	329	\$2,371,506	1.0	(\$36,503)
27 Dry Out												
31C Firm Sales	Block 1	11,606,903	\$0.78159	\$0.43451	(\$0.00753)	\$0.35461	\$7,331,421	\$325.00	687	\$10,010,721	1.0	(\$154,087)
	Block 2	9,923,148	\$0.75008	\$0.43451	(\$0.00847)	\$0.32404					1.0	(\$0.00681)
31C Firm Trans	Block 1											
	Block 2											
31I Firm Sales	Block 1	3,319,196	\$0.75710	\$0.43451	\$0.05254	\$0.27005	\$2,606,630	\$325.00	173	\$3,281,330	1.0	(\$50,507)
	Block 2	7,009,347	\$0.73028	\$0.43451	\$0.05177	\$0.24400					1.0	(\$0.00473)
31I Firm Trans	Block 1											
	Block 2											
32C Firm Sales	Block 1	33,164,985	\$0.67950	\$0.43451	\$0.05103	\$0.19396	\$8,361,908	\$675.00	539	\$12,727,808	1.0	(\$195,909)
	Block 2	10,073,012	\$0.64912	\$0.43451	\$0.04999	\$0.16462					1.0	(\$0.00386)
	Block 3	1,839,604	\$0.59863	\$0.43451	\$0.04826	\$0.11586					1.0	(\$0.00271)
	Block 4	857,789	\$0.54796	\$0.43451	\$0.04652	\$0.06693					1.0	(\$0.00157)
	Block 5	14,475	\$0.51155	\$0.43451	\$0.04526	\$0.03178					1.0	(\$0.00074)
	Block 6	0	\$0.49429	\$0.43451	\$0.04467	\$0.01511					1.0	(\$0.00035)
32I Firm Sales	Block 1	8,834,610	\$0.62799	\$0.43451	\$0.04884	\$0.14464	\$2,640,507	\$675.00	118	\$3,596,307	1.0	(\$55,355)
	Block 2	8,022,724	\$0.60571	\$0.43451	\$0.04821	\$0.12299					1.0	(\$0.00258)
	Block 3	2,768,941	\$0.56843	\$0.43451	\$0.04712	\$0.08680					1.0	(\$0.00182)
	Block 4	2,492,102	\$0.53127	\$0.43451	\$0.04603	\$0.05073					1.0	(\$0.00106)
	Block 5	359,646	\$0.50532	\$0.43451	\$0.04527	\$0.02554					1.0	(\$0.00054)
	Block 6	0	\$0.49228	\$0.43451	\$0.04491	\$0.01286					1.0	(\$0.00027)
32 Firm Trans	Block 1											
	Block 2											
	Block 3											
	Block 4											
	Block 5											
	Block 6											
32C Interr Sales	Block 1											
	Block 2											
	Block 3											
	Block 4											
	Block 5											
	Block 6											
32I Interr Sales	Block 1											
	Block 2											
	Block 3											
	Block 4											
	Block 5											
	Block 6											
32 Interr Trans	Block 1											
	Block 2											
	Block 3											
	Block 4											
	Block 5											
	Block 6											
33												
TOTALS		631,607,397					\$448,936,574		\$689,006	\$541,832,586	\$541,832,586	(\$8,340,014)

Note: Allocation to rate schedules or blocks with zero volumes is calculated on an overall margin percentage change basis.

* Since Billing Rates for rate schedules 31 and 32 do not include demand, column c for those schedules is WACOG only

NW Natural

Rates & Regulatory Affairs

Oregon Schedule 185 and Schedule 186 Credit for November 2024 - October 2025 Storage Activity

Calculation of Increments Allocated on the EQUAL CENT PER THERM BASIS

ALL VOLUMES IN THERMS

				Schedule 186 Credits		
				Proposed Amount:	(\$15,067,680) Temporary Increment	
				Revenue Sensitive Multiplier:	3.018% add revenue sensitive factor	
				Amount to Amortize:	(\$15,536,575) To All sales	
Schedule	Block	2025 Active Customer Volumes	A	Multiplier	Volumes	Increment
				B	C	D
2R			358,526,997	1.0	358,526,997	(\$0.02277)
3C Firm Sales			168,117,721	1.0	168,117,721	(\$0.02277)
3I Firm Sales			4,676,197	1.0	4,676,197	(\$0.02277)
27 Dry Out						
31C Firm Sales	Block 1		11,606,903	1.0	11,606,903	(\$0.02277)
	Block 2		9,923,148	1.0	9,923,148	(\$0.02277)
31C Firm Trans	Block 1					
	Block 2					
31I Firm Sales	Block 1		3,319,196	1.0	3,319,196	(\$0.02277)
	Block 2		7,009,347	1.0	7,009,347	(\$0.02277)
31I Firm Trans	Block 1					
	Block 2					
32C Firm Sales	Block 1		33,164,985	1.0	33,164,985	(\$0.02277)
	Block 2		10,073,012	1.0	10,073,012	(\$0.02277)
	Block 3		1,839,604	1.0	1,839,604	(\$0.02277)
	Block 4		857,789	1.0	857,789	(\$0.02277)
	Block 5		14,475	1.0	14,475	(\$0.02277)
	Block 6		0	1.0	0	(\$0.02277)
32I Firm Sales	Block 1		8,834,610	1.0	8,834,610	(\$0.02277)
	Block 2		8,022,724	1.0	8,022,724	(\$0.02277)
	Block 3		2,768,941	1.0	2,768,941	(\$0.02277)
	Block 4		2,492,102	1.0	2,492,102	(\$0.02277)
	Block 5		359,646	1.0	359,646	(\$0.02277)
	Block 6		0	1.0	0	(\$0.02277)
32 Firm Trans	Block 1					
	Block 2					
	Block 3					
	Block 4					
	Block 5					
	Block 6					
32C Interr Sales	Block 1		3,982,877	1.0	3,982,877	(\$0.02277)
	Block 2		6,038,390	1.0	6,038,390	(\$0.02277)
	Block 3		3,328,311	1.0	3,328,311	(\$0.02277)
	Block 4		5,004,230	1.0	5,004,230	(\$0.02277)
	Block 5		3,268,356	1.0	3,268,356	(\$0.02277)
	Block 6		0	1.0	0	(\$0.02277)
32I Interr Sales	Block 1		4,587,042	1.0	4,587,042	(\$0.02277)
	Block 2		6,058,921	1.0	6,058,921	(\$0.02277)
	Block 3		3,577,793	1.0	3,577,793	(\$0.02277)
	Block 4		10,203,530	1.0	10,203,530	(\$0.02277)
	Block 5		4,760,463	1.0	4,760,463	(\$0.02277)
	Block 6		0	1.0	0	(\$0.02277)
32 Interr Trans	Block 1					
	Block 2					
	Block 3					
	Block 4					
	Block 5					
	Block 6					
33						
TOTALS			682,417,310		682,417,310	(\$0.02277)

NW Natural
Rates & Regulatory Affairs
Oregon Schedule 185 and Schedule 186 Credit for November 2024 - October 2025 Storage Activity

Source: [Margin_Sharing_OR_Sch 185_and_186_2025.xlsx](#)

	TOTAL	Schedule 185	Schedule 186
Interstate Storage Services & Optimization 2024-25	(\$22,885,505.00)	(\$7,993,832.00)	(\$14,891,673.00)
Remaining balance from 2024 credit provided in 2025	(\$270,487.06)	(\$94,480.00)	(\$176,007.06)
Total for 2025 filing	<u>(\$23,155,992.06)</u>	<u>(\$8,088,312.00)</u>	<u>(\$15,067,680.06)</u>