

March 25, 2024

NWN WUTC Advice No. 24-04

VIA ELECTRONIC FILING

Jeff Killip, Executive Director & Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: Schedule G – Energy Efficiency Services and Programs – Residential and Commercial

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following revisions to its Tariff WN U-6, stated to become effective with service on and after May 10, 2024.

Eighteenth Revision of Sheet G.1	Schedule G	Energy Efficiency Services and Programs – Residential and Commercial
Original Sheet G.2	Schedule G	Energy Efficiency Services and Programs – Residential and Commercial (continued)

Purpose

The purpose of this filing is to propose two housekeeping revisions to the Company's Schedule G Energy Efficiency Services and Programs - Residential and Commercial (Schedule G): 1) correct reference to NW Natural's website in the Description section of the tariff and add other language reflective of the conditions set for the Company's Biennial Energy Efficiency Plan¹ (BEEP conditions), and 2) update the language in the Reporting section to comply with BEEP conditions.

Background

Schedule G describes the Company's energy efficiency services and programs for residential and commercial customers. The Company partners with Energy Trust of Oregon to deliver and administer cost-effective energy efficiency programs.

NW Natural presented these proposed tariff changes to its Energy Efficiency Advisory Group (EEAG) on January 29, 2024. In compliance with BEEP conditions, NW Natural also shared a copy of this filing with its EEAG on February 1, 2024.

Proposed Changes

Schedule G, Sheet G.1:

1. Description section:
 - a. Update the website link on the tariff; the current link is no longer active.
 - b. Add language regarding NW Natural's collaboration with strategic market partners regarding the Company's energy efficiency programs, services and measures to reflect BEEP conditions.

¹ Please refer to Attachments A from Orders 01 in dockets UG-210831 and UG-230944 for BEEP conditions.

- c. Add language regarding limited duration pilot program as discussed in NW Natural's BEEP.
2. Reporting Section:
 - a. Update the language to match BEEP conditions, which call for filing a BEEP in odd-numbered years and an Energy Efficiency Report annually.

This filing has no impact on customer rates.

Conclusion

NW Natural respectfully requests that the Commission approve the proposed revisions of the enclosed tariff sheets to become effective with service on and after May 10, 2024.

As required by WAC 480-80-103(4)(a), I certify that I have authority to issue tariff revisions on behalf of NW Natural.

Copies of this letter and the attached filing are available in the Company's main office in Portland, Oregon, and on its website at www.nwnatural.com.

For purposes of establishing a service list and for any questions, please address correspondence on this matter to me with copies to the following:

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

Sincerely,

NW NATURAL

/s/ Rebecca Trujillo

Rebecca Trujillo
Regulatory Consultant
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Attachments

NEW-NWN-WUTC-Advice-24-04-Trf-Sheet-G-1-03-25-24
NEW-NWN-WUTC-Advice-24-04-Trf-Sheet-G-2-03-25-24

NORTHWEST NATURAL GAS COMPANY

WN U-6

Eighteenth Revision of Sheet G.1

Cancels Seventeenth Revision of Sheet G.1

SCHEDULE G ENERGY EFFICIENCY SERVICES AND PROGRAMS – RESIDENTIAL AND COMMERCIAL

APPLICABLE:

This program is intended to provide an economical and effective means for conserving Natural Gas through reduced heat loss and improved efficiencies in Residential dwellings and Commercial buildings.

AVAILABLE:

To all Residential Customers served on Rate Schedules 1, 2 and 27; and all Commercial Firm and Interruptible Sales Customers served on Rate Schedules 1, 3, 41 and 42 in all territory served by the Company under the Tariff of which this program is a part.

DESCRIPTION:

The Energy Trust of Oregon (Energy Trust) will deliver and administer a cost-effective energy efficiency program to NW Natural's Residential and Commercial Firm Sales and Interruptible Sales Customers in accordance with the Company's Energy Efficiency Plan. Energy Trust administered programs will offer applicable Customers incentive dollars for installing specific, cost-effective energy efficient measures, including rebates for energy efficient retrofit or replacement appliances. Program offerings may vary from time-to-time. Current offerings are described on the following Company webpage:

<https://www.nwnatural.com/ways-to-save/savings-programs>

(T)

Regional studies and market transformation are conducted in collaboration with the Northwest Power Council's Regional Technical Forum and the Northwest Energy Efficiency Alliance. NW Natural may offer limited time pilots outlined in the Company's Biennial Energy Efficiency Plan. Scope and duration of pilots are defined in collaboration with NW Natural's Energy Efficiency Advisory Group.

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OVERSIGHT

Oversight of these programs will be provided by the Energy Efficiency Advisory Group (EEAG), which is a group comprised of interested parties to the Company's 2008 general rate case. EEAG oversight is required per the stipulated agreement attached to Commission Order No. 04 to the Company's rate case, docketed as UG-080546. The Company will consult with the EEAG prior to making any significant program changes such as changing an incentive amount or adding program measures. The Company shall provide drafts of annual reports, annual plans, and all tariff adjustments to the EEAG for review at least 20 calendar days before filing.

REPORTING

The Company shall file a Biennial Energy Efficiency Plan (BEEP) by November 15 of each odd-numbered year. The BEEP shall describe anticipated demand-side management (DSM) activities for the upcoming calendar year and how the plan will help the Company achieve its biennial conservation target. The Company shall file an annual conservation report by June 15 of each year for prior year activity. The report shall describe the DSM program's targets and gas savings achieved and compare actual and forecasted expenses to the prior year.

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CUSTOMER NOTIFICATION

This information may be provided through the use of bill inserts, displays, booklets, handouts, advertisements, and industry and public agency literature.

(K)

(continued to Sheet G.2)

(K) Transferred to Sheet G.1.

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SCHEDULE G
ENERGY EFFICIENCY SERVICES AND PROGRAMS – RESIDENTIAL AND
COMMERCIAL
(continued)

FUNDING

The costs incurred for the administration and delivery of the services and programs offered under this Schedule will be recovered through a conservation tariff adjustment filing that the Company will make each year by September 15, with an effective date of November 1. Rates effective November 1 through October 31 of each year shall collect the forecasted expenses for that same time period plus the prior period deferral balance. The prior period deferral balance shall capture any variations between the forecasted amounts and actual expensed amounts for the same period. Deferred balances will accrue interest.

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(M) Moved from Sheet G.1

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