

October 7, 2025

NWN WUTC Advice No. 25-02A / UG-250552

VIA ELECTRONIC FILING

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

RE: UG-250711 - Schedule 303—NW Natural's Environmental Cost Recovery Mechanism Annual Tariff Adjustment Filing and 2024 Annual Report – Replacement Page – DO NOT REDOCKET

Dear Mr. Killip:

On July 15, 2025, Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), filed a tariff revision in the above-mentioned docket with an effective date of November 1, 2025.

The purpose of this filing is to update the usage-per-customer data to align with the most recent General Rate Case, UG-200994, by providing a revised page 2 to Exhibit C and to revise the proposed changes in the original cover letter. Tariff Sheet 303.3, Exhibits A, B and D, and the Environmental Cost Recovery Mechanism Regulatory report remain unchanged from the July 15th filing.

Proposed Changes

If there were no other adjustments to rates effective November 1, 2025, the effect of the proposed rates in Schedule 303 is an increase of \$37,310.¹ The average residential Schedule 2 customer using 56 therms would see an increase of \$0.03 per month, and the average Schedule 3 commercial customer using 236 therms would see a bill increase of \$0.09 per month. The bill impact for customers on the other residential and commercial rate schedules is shown on page 2 of Exhibit C.

The proposed rate change will affect all of NW Natural's Washington sales and transportation service customers. NW Natural currently serves approximately 91,114 residential customers and 7,462 commercial and industrial customers in the Company's Washington service territory.

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

¹ Includes revenue sensitive factor of 4.357%; additional details can be found within Exhibit C.

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

Respectfully Submitted,

/s/ Kyle Walker, CPA

Kyle Walker, CPA
Rates/Regulatory Senior Manager
NW Natural
250 SW Taylor Street
Portland, OR 97204
Telephone: (503) 610-7051
kyle.walker@nwnatural.com

Enclosure:
250552-NWN-2024-ECRM-Rpt-Advice-25-02A-Exh-C-R-Pg-2-10-07-25

NW Natural
Rates & Regulatory Affairs
2025-2026 ECRM Filing - Washington
Effects on Average Bill by Rate Schedule
Calculation of Effect on Customer Average Bill by Rate Schedule [1]

			PGA	Therms	Normal	Minimum	CCA	Net	Current	Current	Current	Proposed	Proposed	Proposed	
			Volumes	in Block	Monthly	Monthly	Monthly	Monthly	Billing	Average	11/1/2024	11/1/2025	11/1/2025	11/1/2025	
					Average Use	Charge	Avg. Credit	Charge	Rate	Bill	ECRM	Total	Average Bill	% Bill Change	
									1/1/2025	1/1/2025	Rates	Rates	Rates		
										F=D+(C*E) F	G	[Z] H	T = D+(C*G) H	I=(K-I)/J J	
	Schedule	Block													
1	1R		179,824	N/A	20.0	\$ 5.50	\$1.82	\$	3.68	\$1.66830	\$37.05	\$0.01396	\$1.67292	\$37.14	0.2%
2	1C		18,807	N/A	114.0	\$ 7.00	\$ 5.34	\$	1.66	\$1.67264	\$192.34	\$0.01211	\$1.67297	\$192.38	0.0%
3	2R		59,991,192	N/A	56.0	\$ 8.00	\$ 10.54	\$	(2.54)	\$1.31527	\$71.11	\$0.00805	\$1.31575	\$71.14	0.0%
4	3 CFS		21,359,579	N/A	236.0	\$ 22.00	\$ 48.32	\$	(26.32)	\$1.27854	\$275.41	\$0.00715	\$1.27891	\$275.50	0.0%
5	3 IFS		192,102	N/A	975.0	\$ 22.00	\$ 129.16	\$	(107.16)	\$1.23031	\$1,092.39	\$0.00656	\$1.23070	\$1,092.77	0.0%
6	27		34,823	N/A	50.0	\$ 9.00	\$	\$	9.00	\$0.00117	\$64.80	\$0.00117	\$0.00117	\$65.16	0.6%
7	41C Firm Sales	Block 1	1,665,389	2,000	3,436.0	\$ 250.00	\$ 515.09	\$	(265.09)	\$1.03949	\$0.00575	\$1.03972	\$0.00575	\$1.03972	0.0%
8		Block 2	2,698,481	all additional						\$0.98116	\$0.00507	\$0.98136			0.0%
9	TOTAL									\$3,222.84			\$3,223.58		0.0%
10	41I Firm Sales	Block 1	331,379	2,000	4,741.0	\$ 250.00	\$ 622.72	\$	(372.72)	\$0.94622	\$0.00493	\$0.94671			0.0%
11		Block 2	593,487	all additional						\$0.89909	\$0.00434	\$0.89953			0.1%
12	TOTAL									\$3,984.13			\$3,986.31		0.1%
13	41C Interr Sales	Block 1	0	2,000	0.0	\$ 250.00	\$ 515.09	\$	(265.09)	\$0.96427	\$0.00546	\$0.96459			0.0%
14		Block 2	0	all additional						\$0.91047	\$0.00481	\$0.91075			0.0%
15	TOTAL									\$ 250.00			\$ 250.00		0.0%
16	41I Interr Sales	Block 1	0	2,000	0.0	\$ 250.00	\$ 622.72	\$	(372.72)	\$0.90245	\$0.00516	\$0.90276			0.0%
17		Block 2	0	all additional						\$0.85609	\$0.00455	\$0.85636			0.0%
18	TOTAL									\$ 250.00			\$ 250.00		0.0%
19	41C Firm Transp	Block 1	123,243	2,000	4,648.0	\$ 500.00	\$ 515.09	\$	(15.09)	\$0.64044	\$0.00569	\$0.64091			0.1%
20		Block 2	284,875	all additional						\$0.59302	\$0.00501	\$0.59344			0.1%
21	TOTAL									\$2,836.11			\$2,838.16		0.1%
22	41I Firm Transp	Block 1	0	2,000	0.0	\$ 500.00	\$ 622.72	\$	(122.72)	\$0.62856	\$0.00522	\$0.62887			0.0%
23		Block 2	0	all additional						\$0.58256	\$0.00460	\$0.58285			0.0%
24	TOTAL									\$ 500.00			\$ 500.00		0.0%
25	42C Firm Sales	Block 1	820,213	10,000	11,949.0	\$ 1,300.00	\$ 3,945.77	\$	(3,842.77)	\$0.79626	\$0.00320	\$0.79646			0.0%
26		Block 2	926,223	20,000						\$0.77027	\$0.00286	\$0.77045			0.0%
27		Block 3	323,675	20,000						\$0.71863	\$0.00219	\$0.71877			0.0%
28		Block 4	84,983	100,000						\$0.68461	\$0.00176	\$0.68472			0.0%
29		Block 5	0	600,000						\$0.63927	\$0.00117	\$0.63934			0.0%
30		Block 6	0	all additional						\$0.58259	\$0.00044	\$0.58262			0.0%
31	TOTAL									\$5,621.59			\$5,623.94		0.0%
32	42I Firm Sales	Block 1	887,030	10,000	12,869.0	\$ 1,300.00	\$ 3,945.77	\$	(2,645.77)	\$0.73169	\$0.00310	\$0.73206			0.0%
33		Block 2	668,287	20,000						\$0.71258	\$0.00277	\$0.71292			0.0%
34		Block 3	109,045	20,000						\$0.67457	\$0.00213	\$0.67482			0.0%
35		Block 4	24,233	100,000						\$0.64957	\$0.00170	\$0.64978			0.0%
36		Block 5	0	600,000						\$0.61626	\$0.00114	\$0.61639			0.0%
37		Block 6	0	all additional						\$0.57455	\$0.00043	\$0.57460			0.0%
38	TOTAL									\$6,715.52			\$6,720.20		0.1%
39	42C Firm Trans	Block 1	122,544	10,000	51,470.0	\$ 1,550.00	\$ 3,945.77	\$	(3,592.77)	\$0.40332	\$0.00193	\$0.40358			0.1%
40		Block 2	245,084	20,000						\$0.38640	\$0.00173	\$0.38663			0.0%
41		Block 3	245,088	20,000						\$0.35269	\$0.00133	\$0.35286			0.0%
42		Block 4	403,344	100,000						\$0.33054	\$0.00106	\$0.33068			0.0%
43		Block 5	0	600,000						\$0.30097	\$0.00071	\$0.30106			0.0%
44		Block 6	0	all additional						\$0.26403	\$0.00027	\$0.26406			0.0%
45	TOTAL									\$15,708.68			\$15,719.43		0.1%
46	42I Firm Trans	Block 1	933,452	10,000	63,374.0	\$ 1,550.00	\$ 3,945.77	\$	(2,395.77)	\$0.40096	\$0.00206	\$0.40121			0.1%
47		Block 2	1,354,332	20,000						\$0.38427	\$0.00184	\$0.38450			0.0%
48		Block 3	1,182,765	20,000						\$0.35105	\$0.00141	\$0.35123			0.0%
49		Block 4	2,743,941	100,000						\$0.32922	\$0.00113	\$0.32936			0.0%
50		Block 5	1,030,134	600,000						\$0.30009	\$0.00075	\$0.30019			0.0%
51		Block 6	0	all additional						\$0.26369	\$0.00028	\$0.26373			0.0%
52	TOTAL									\$20,723.22			\$20,735.79		0.1%
53	42C Interr Sales	Block 1	237,824	10,000	39,322.0	\$ 1,300.00	\$ 3,945.77	\$	(3,842.27)	\$0.71133	\$0.00236	\$0.71149			0.0%
54		Block 2	449,890	20,000						\$0.69043	\$0.00212	\$0.69057			0.0%
55		Block 3	201,897	20,000						\$0.64878	\$0.00162	\$0.64889			0.0%
56		Block 4	59,596	100,000						\$0.62141	\$0.00130	\$0.62149			0.0%
57		Block 5	0	600,000						\$0.58493	\$0.00067	\$0.58498			0.0%
58		Block 6	0	all additional						\$0.53925	\$0.00032	\$0.53928			0.0%
59	TOTAL									\$23,127.56			\$23,132.98		0.0%
60	42I Interr Sales	Block 1	171,533	10,000	13,758.0	\$ 1,300.00	\$ 3,945.77	\$	(2,645.77)	\$0.69064	\$0.00281	\$0.69079			0.0%
61		Block 2	27,036	20,000						\$0.67199	\$0.00252	\$0.67212			0.0%
62		Block 3	0	20,000						\$0.63489	\$0.00193	\$0.63499			0.0%
63		Block 4	0	100,000						\$0.61048	\$0.00154	\$0.61057			0.0%
64		Block 5	0	600,000						\$0.57791	\$0.00103	\$0.57796			0.0%
65		Block 6	0	all additional						\$0.53724	\$0.00039	\$0.53726			0.0%
66	TOTAL									\$6,785.97			\$6,787.96		0.0%
67	42C Inter Trans	Block 1	0	10,000	0.0	\$ 1,550.00	\$ 3,945.77	\$	(3,592.77)	\$0.39076	\$0.00201	\$0.39088			0.0%
68		Block 2	0	20,000						\$0.37516	\$0.00180	\$0.37527			0.0%
69		Block 3	0	20,000						\$0.34405	\$0.00138	\$0.34413			0.0%
70		Block 4	0	100,000						\$0.32360	\$0.00111	\$0.32366			0.0%
71		Block 5	0	600,000						\$0.29633	\$0.00074	\$0.29637			0.0%
72		Block 6	0	all additional						\$0.26221	\$0.00028	\$0.26222			0.0%
73	TOTAL									\$ 1,550.00			\$ 1,550.00		0.0%
74	42I Inter Trans	Block 1	952,237	10,000	95,634.0	\$ 1,550.00	\$ 3,945.77	\$	(2,395.77)	\$0.39347	\$0.00201	\$0.39357			0.0%
75		Block 2	1,827,775	20,000						\$0.37758	\$0.00180	\$0.37767			0.0%
76		Block 3	1,364,376	20,000						\$0.34592	\$0.00138	\$0.34599			0.0%
77		Block 4	4,116,253	100,000						\$0.32511	\$0.00110	\$0.32517			0.0%
78		Block 5	1,831,129	600,000						\$0.29736	\$0.00074	\$0.29739			0.0%
79		Block 6	0	all additional						\$0.26266	\$0.00028	\$0.26267			0.0%
80	TOTAL									\$30,845.00			\$30,851.94		0.0%
81	43 Firm Trans	0	N/A		0.0	\$38,000.00	\$0.00	\$38,000.00	\$0.00492	\$38,000.00	\$0.00000	\$0.00492	\$38,000.00		0.0%
82	43 Interr Trans	0	N/A		0.0	\$38,000.00	\$0.00	\$38,000.00	\$0.00492	\$38,000.00	\$0.00000	\$0.00492	\$38,000.00		0.0%
83	Intentionally blank														0.0%
84	[1] Rate Schedule 41 and 42 customers may choose demand charges at a volumetric rate or based on MDDV. For convenience of presentation, demand charges are not included in the calculations for those schedules.														
85	[2] Proposed new ECRM rates is equal to Current Billing Rate plus New ECRM rates less Current ECRM rates.														
86	Sources:														
87	Direct Inputs								per Tariff						
88									per Tariff						