

October 7, 2025

NWN WUTC Advice No. 25-04A / UG-250715

VIA ELECTRONIC FILING

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

Re: UG-250715 - Schedule 215: Adjustment to Rates for Energy Efficiency Service and Programs - Replacement Pages – DO NOT REDOCKET

Dear Mr. Killip:

On September 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 A and to revise the proposed changes in the original cover letter. Tariff Sheets 215.1 and 215.2 remain unchanged from the September 15th filing.

Proposed Changes

If there were no other adjustments to rates effective November 1, 2025, the average residential Schedule 2 customer using 56 therms would see an increase of \$0.09¹ per month, and the average Schedule 3 commercial customer using 236 therms would see a bill increase of \$0.23 per month. The bill impact for customers on the other residential and commercial rate schedules is shown on page 2 of the supporting materials to this filing.

The proposed rate change will affect all of NW Natural's Washington residential and commercial class sales service customers. NW Natural currently serves approximately 91,114 residential customers and 7,378 commercial customers in the Company's Washington service territory.

¹ All bill impacts assume Climate Commitment Act charges and credits for non-low income customers who joined NW Natural's system before July 25, 2021, as set out in Schedule 308 - Washington Climate Commitment Act Recovery Mechanism.

Please address correspondence on this matter to Michael Lewis at Michael.Lewis@nwnatural.com with copies to the following:

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

Sincerely,

NW NATURAL

/s/ Kyle Walker, CPA

Kyle Walker, CPA
Rates/Regulatory Senior Manager
NW Natural
250 SW Taylor Street
Portland, OR 97204
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kyle.walker@nwnatural.com

Attachments:

250715-NWN-WUTC-Advice-25-04A-WA-EE-Programs-Exh-A-R-Pg-2-10-07-25
250715-NWN-WUTC-Advice-25-04A-WA-EE-Programs-Exh-A-R-10-07-25-xlsx²

² Per UG 200994 Order 05 under the rate mitigation provisions the Company will spread the historical Energy Efficiency Deferral tariff equally over the 2021-22 and 2022-23 PGA years. Therefore, tab '186317 was also filed in the 2021-22 PGA for the historical Energy Efficiency tariff calculation.

Calculation of Effect on Customer Average Bill by Rate Schedule [1] [3]

		Washington PGA Normalized Volumes page, Column D	Therms in Block	Normal Therms Monthly Average use	Minimum Monthly Charge	Current CCA Monthly Avg. Credit	Current Net Minimum Monthly Charge	Proposed CCA Monthly Avg. Credit	Proposed Net Minimum Monthly Charge	Current 11/1/2021 Billing Rates	11/1/2026 Current Average Bill[2]	Proposed 11/1/2026 Rates [3]	Proposed 11/1/2026 R&C Energy Eff. Average Bill	Proposed 11/1/2026 % Bill Change
		A	B	C		D				E	F=D*(C * E)	G	H=D*(C * G)	I
Schedule	Block													
1R		179,824	N/A	20.0	\$5.50	\$1.82	\$3.68	\$1.82	\$3.68	\$1.66830	\$37.05	\$1.69995	\$37.68	1.7%
1C		18,807	N/A	114.0	\$7.00	\$5.34	\$1.66	\$5.34	\$1.66	\$1.67264	\$192.34	\$1.67215	\$192.28	0.0%
2R		59,991,192	N/A	56.0	\$8.00	\$10.54	(\$2.54)	\$10.54	(\$2.54)	\$1.31527	\$71.11	\$1.31686	\$71.20	0.1%
3 CFS		21,359,579	N/A	236.0	\$22.00	\$48.32	(\$26.32)	\$48.32	(\$26.32)	\$1.27854	\$275.41	\$1.27948	\$275.64	0.1%
3 IFS		192,102	N/A	975.0	\$22.00	\$129.16	(\$107.16)	\$129.16	(\$107.16)	\$1.23031	\$1,092.39	\$1.23031	\$1,092.39	0.0%
27		34,823	N/A	50.0	\$9.00	\$0.00	\$9.00	\$0.00	\$9.00	\$1.11591	\$64.80	\$1.16931	\$67.47	4.1%
41C Firm Sales	Block 1	1,665,389	2,000	3,436.0	\$250.00	\$515.09	(\$265.09)	\$515.09	(\$265.09)	\$1.03949		\$1.03971		
	Block 2	2,698,481	all additional							\$0.98116		\$0.98135		
	TOTAL										\$3,222.84		\$3,223.55	0.0%
41I Firm Sales	Block 1	331,379	2,000	4,741.0	\$250.00	\$622.72	(\$372.72)	\$622.72	(\$372.72)	\$0.94622		\$0.94622		
	Block 2	593,487	all additional							\$0.89909		\$0.89909		
	TOTAL										\$3,984.13		\$3,984.13	0.0%
41C Interr Sales	Block 1	0	2,000	0.0	\$250.00	\$515.09	\$250.00	\$515.09	\$250.00	\$0.96427		\$0.96546		
	Block 2	0	all additional							\$0.91047		\$0.91150		
	TOTAL										\$250.00		\$250.00	0.0%
41I Interr Sales	Block 1	0	2,000	0.0	\$250.00	\$622.72	\$250.00	\$622.72	\$250.00	\$0.90245		\$0.90245		
	Block 2	0	all additional							\$0.85609		\$0.85609		
	TOTAL										\$250.00		\$250.00	0.0%
41C Firm Trans	Block 1	123,243	2,000	4,648.0	\$500.00	\$515.09	(\$15.09)	\$515.09	(\$15.09)	\$0.64044		\$0.64044		
	Block 2	284,875	all additional							\$0.59302		\$0.59302		
	TOTAL										\$2,836.11		\$2,836.11	0.0%
41I Firm Trans	Block 1	0	2,000	0.0	\$500.00	\$622.72	\$500.00	\$622.72	\$500.00	\$0.62856		\$0.62856		
	Block 2	0	all additional							\$0.58256		\$0.58256		
	TOTAL										\$500.00		\$500.00	0.0%
42C Firm Sales	Block 1	820,213	10,000	11,949.0	\$1,300.00	\$5,142.27	(\$1,576.48)	\$5,142.27	(\$1,576.48)	\$0.79626		\$0.79622		
	Block 2	926,223	20,000							\$0.77027		\$0.77023		
	Block 3	323,675	20,000							\$0.71863		\$0.71860		
	Block 4	84,983	100,000							\$0.68461		\$0.68459		
	Block 5	0	600,000							\$0.63927		\$0.63925		
	Block 6	0	all additional							\$0.58259		\$0.58259		
	TOTAL										\$7,887.38		\$7,886.90	0.0%
42I Firm Sales	Block 1	887,030	10,000	12,869.0	\$1,300.00	\$3,945.77	(\$1,797.95)	\$3,945.77	(\$1,797.95)	\$0.73169		\$0.73169		
	Block 2	668,287	20,000							\$0.71258		\$0.71258		
	Block 3	109,048	20,000							\$0.67457		\$0.67457		
	Block 4	24,233	100,000							\$0.64957		\$0.64957		
	Block 5	0	600,000							\$0.61626		\$0.61626		
	Block 6	0	all additional							\$0.57455		\$0.57455		
	TOTAL										\$7,563.34		\$7,563.34	0.0%
42C Firm Trans	Block 1	122,544	10,000	\$1,470.0	\$1,550.00	\$5,142.27	(\$3,592.27)	\$5,142.27	(\$3,592.27)	\$0.40332		\$0.40332		
	Block 2	245,088	20,000							\$0.38640		\$0.38640		
	Block 3	245,088	20,000							\$0.35269		\$0.35269		
	Block 4	403,344	100,000							\$0.33054		\$0.33054		
	Block 5	0	600,000							\$0.30097		\$0.30097		
	Block 6	0	all additional							\$0.26403		\$0.26403		
	TOTAL										\$15,708.62		\$15,708.62	0.0%
42I Firm Trans	Block 1	933,452	10,000	63,374.0	\$1,550.00	\$3,945.77	(\$2,395.77)	\$3,945.77	(\$2,395.77)	\$0.40096		\$0.40096		
	Block 2	1,354,332	20,000							\$0.38427		\$0.38427		
	Block 3	1,182,765	20,000							\$0.35105		\$0.35105		
	Block 4	2,743,941	100,000							\$0.32922		\$0.32922		
	Block 5	1,030,134	600,000							\$0.30009		\$0.30009		
	Block 6	0	all additional							\$0.26369		\$0.26369		
	TOTAL										\$20,723.22		\$20,723.22	0.0%
42C Interr Sales	Block 1	237,824	10,000	39,322.0	\$1,300.00	\$5,142.27	(\$3,842.27)	\$5,142.27	(\$3,842.27)	\$0.71133		\$0.71192		
	Block 2	449,890	20,000							\$0.69043		\$0.69095		
	Block 3	201,897	20,000							\$0.64878		\$0.64917		
	Block 4	59,596	100,000							\$0.62141		\$0.62174		
	Block 5	0	600,000							\$0.58493		\$0.58514		
	Block 6	0	all additional							\$0.53925		\$0.53934		
	TOTAL										\$23,127.56		\$23,147.49	0.1%
42I Interr Sales	Block 1	171,533	10,000	13,758.0	\$1,300.00	\$3,945.77	(\$2,011.96)	\$3,945.77	(\$2,011.96)	\$0.69064		\$0.69064		
	Block 2	27,036	20,000							\$0.67199		\$0.67199		
	Block 3	0	20,000							\$0.63489		\$0.63489		
	Block 4	0	100,000							\$0.61048		\$0.61048		
	Block 5	0	600,000							\$0.57791		\$0.57791		
	Block 6	0	all additional							\$0.53724		\$0.53724		
	TOTAL										\$7,419.78		\$7,419.78	0.0%
42C Inter Trans	Block 1	0	10,000	0.0	\$1,550.00	\$5,142.27	\$1,550.00	\$5,142.27	\$1,550.00	\$0.39076		\$0.39076		
	Block 2	0	20,000							\$0.37516		\$0.37516		
	Block 3	0	20,000							\$0.34405		\$0.34405		
	Block 4	0	100,000							\$0.32360		\$0.32360		
	Block 5	0	600,000							\$0.29633		\$0.29633		
	Block 6	0	all additional							\$0.26221		\$0.26221		
	TOTAL										\$1,550.00		\$1,550.00	0.0%
42I Inter Trans	Block 1	952,237	10,000	95,634.0	\$1,550.00	\$3,945.77	(\$2,395.77)	\$3,945.77	(\$2,395.77)	\$0.39347		\$0.39347		
	Block 2	1,827,775	20,000							\$0.37758		\$0.37758		
	Block 3	1,364,376	20,000							\$0.34592		\$0.34592		
	Block 4	4,116,253	100,000							\$0.32511		\$0.32511		
	Block 5	1,831,129	600,000							\$0.29736		\$0.29736		
	Block 6	0	all additional							\$0.26266		\$0.26266		
	TOTAL										\$30,845.00		\$30,845.00	0.0%
43 Firm Trans		0	N/A	0.0	\$38,000.00		\$38,000.00	0.0		\$0.24685	\$38,000.00	\$0.24685	\$38,000.00	0.0%
43 Interr Trans		0	N/A	0.0	\$38,000.00		\$38,000.00	0.0		\$0.24685	\$38,000.00	\$0.24685	\$38,000.00	0.0%

[2] Proposed new CCA rates is equal to Current Billing Rate plus New CCA rates less current CCA rates. Assumes customer receives CCA credit.

[3] For Schedules where the average usage would generate a new credit, the non-volumetric credits have been capped at the CCA cost.

Sources:

Direct Inputs	per Tariff	per Tariff
Rates in summary		Column A