

October 9, 2025

NWN WUTC Advice No. 25-04B / 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 remove the accrual of interest and associated dollars on the Energy Efficiency true-up amortization account beginning November 2024 through the proposed rate effective date of this filing. Replacement pages 1-6 of Exhibit A, cover letter, and tariff sheets 215.1 and 215.2 are included with this filing. The remaining pages of Exhibit A remain unchanged.

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 \$0.20 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
(503) 610-7051
kyle.walker@nwnatural.com

Attachments:

250715-NWN-WUTC-Advice-25-04B-WA-EE-Programs-Trf-Sheet-215-1-R-Pg-10-09-25
250715-NWN-WUTC-Advice-25-04B-WA-EE-Programs-Trf-Sheet-215-2-R-Pg-10-09-25
250715-NWN-WUTC-Advice-25-04B-WA-EE-Programs-Exh-A-R-Pg-1-6-10-09-25
250715-NWN-WUTC-Advice-25-04B-WA-EE-Programs-Exh-A-R-10-09-25-xlsx

NORTHWEST NATURAL GAS COMPANY

WN U-6

Twenty-Eighth Revision of Sheet 215.1

Cancels Twenty-Seventh Revision of Sheet 215.1

SCHEDULE 215 ADJUSTMENT TO RATES ENERGY EFFICIENCY SERVICE AND PROGRAMS

PURPOSE:

To identify adjustments to rates in the Rate Schedules listed below for the amortization, with interest, of balances in a deferred account that recover costs associated with providing energy conservation services offered under Schedule G, "Energy Efficiency Services and Programs" of this Tariff.

APPLICABLE:

To Sales Service Customers throughout the Company's service territory in Washington that take service under the Rate Schedules listed herein.

Schedule 1

Schedule 3 CSF

Schedule 41 CSF/ CSI

Schedule 2

Schedule 27

Schedule 42 CSF/ CSI

APPLICATION TO RATE SCHEDULES:

Effective: November 1, 2025

(C)

Each year, in accordance with the terms agreed to in the Company's Energy Efficiency Plan, Sales Service rates for the Rate Schedules listed below will be adjusted on an equal percent of margin basis, to recover the actual costs of energy conservation programs incurred – these costs are reflected in the column labeled Schedule G Current Year Costs. Adjustments to Current Year Costs rates shall be made coincident with the Company's annual Purchased Gas Adjustment (PGA) filing, or at such other time as the Commission may authorize.

The rates in the Rate Schedules listed below include the following adjustments:

Schedule	Block	Schedule G Total
1R		\$0.14183
1C		\$0.09513
2		\$0.06515
3 (CSF)		\$0.05742
27		\$0.14519
41 (CSF)	Block 1	\$0.04563
	Block 2	\$0.04021
41 (CSI)	Block 1	\$0.04173
	Block 2	\$0.03676

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(continue to Sheet 215.2)

Issued September 15, 2025
NWN WUTC Advice No. 25-04B

Effective with service on
and after November 1, 2025

NORTHWEST NATURAL GAS COMPANY

WN U-6 Fifth Revision of Sheet 215.2

Cancels Fourth Revision of Sheet 215.2

SCHEDULE 215
ADJUSTMENT TO RATES
ENERGY EFFICIENCY SERVICE AND PROGRAMS
(continued)

Schedule	Block	Schedule G Total
42(CSF)	Block 1	\$0.02520
	Block 2	\$0.02255
	Block 3	\$0.01730
	Block 4	\$0.01384
	Block 5	\$0.00923
	Block 6	\$0.00346
42(CSI)	Block 1	\$0.01925
	Block 2	\$0.01723
	Block 3	\$0.01321
	Block 4	\$0.01057
	Block 5	\$0.00705
	Block 6	\$0.00264

(R)

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Issued September 15, 2025
NWN WUTC Advice No. 25-04B

Effective with service on
and after November 1, 2025

EXHIBIT A

BEFORE THE
WASHINGTON UTILITIES & TRANSPORTATION COMMISSION

NW NATURAL
SUPPORTING MATERIALS

WA EE PROGRAM COSTS (CURRENT & HISTORICAL)

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

October 9, 2025

NW NATURAL

EXHIBIT A

Supporting Materials

WA EE PROGRAM COSTS (CURRENT & HISTORICAL)

NWN WUTC ADVICE NO. 25-04B / UG-250715

Description	Page
Calculation of Increments Allocated on Equal Percentage of Margin Basis	1
Calculation of Effect on Customer Average Bill by Rate Schedule	2
Summary of Deferred Accounts	3
151894 Washington EE Amortization	4
151898 Washington EE True-Up Deferral	5
Schedule 215 Effects on Revenue	6

NW Natural

Rates & Regulatory Affairs

2025-2026 PGA Filing - Washington: September Filing

Calculation of Increments Allocated on the EQUAL PERCENTAGE OF MARGIN BASIS

													FORECAST			DEFERRAL - Gas Actg			HISTORICAL - Calculation		
													R&C Energy Efficiency Programs - Forecast			R&C Energy Efficiency Programs - Deferral			R&C Energy Efficiency Programs - Historical		
													5,254,526 Temporary Increments			(75,067) Temporary Increments			0 Allocated to Rate Schedules		
													4.357% add revenue sensitive factor			4.357% add revenue sensitive factor			4.357% add revenue sensitive factor		
													Amount to Amortize:			Amount to Amortize:			Amount to Amortize:		
													5,493,890 All Residential and Commercial sales			(78,487) All Residential and Commercial sales			0 All Residential and Commercial sales		
													Multiplier Allocation to R Increment			Multiplier Allocation to R Increment			Multiplier Allocation to F Increment		
													J K L			J K L			J K L		
													1.0 \$25,874 \$0.14389 1.0 (\$370) (\$0.00206) 1.0 \$0 \$0.00000			1.0 (\$26) (\$0.00138) 1.0 \$0 \$0.00000			1.0 \$0 \$0.00000		
													1.0 \$1,815 \$0.09651 1.0 (\$56,641) (\$0.00094) 1.0 \$0 \$0.00000			1.0 (\$17,776) (\$0.00083) 1.0 \$0 \$0.00000			1.0 \$0 \$0.00000		
													1.0 \$3,964,723 \$0.06609 1.0 (\$244,285) (\$0.00060) 1.0 \$0 \$0.00000			1.0 (\$54,407) (\$0.00000) 1.0 \$0 \$0.00000			1.0 \$0 \$0.00000		
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NW Natural
Rates & Regulatory Affairs
2025-2026 PGA Filing - Washington: September Filing
Effects on Average Bill by Rate Schedule
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 1/1/2025 Billing Rates	11/1/2025 Current Average Bill[2]	Proposed 11/1/2025 R&C Energy Eff. Average Bill	Proposed 11/1/2025 R&C Energy Eff. Average Bill	Proposed 11/1/2025 % Bill Change	
											F=D+(C * E)	H=D+(C * G)			
	Schedule	Block	A	B	C		D		E		F	G	H	I	
	1R		179,824	N/A	20.0	\$5.50	\$1.82	\$3.68	\$1.82	\$3.68	\$1.66830	\$37.05	\$1.69967	\$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	\$1.67194	\$192.26	0.0%
	2R		59,991,192	N/A	56.0	\$8.00	\$10.54	(\$2.54)	\$10.54	(\$2.54)	\$1.31527	\$71.11	\$1.31674	\$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	\$1.27937	\$275.61	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	\$1.16905	\$67.45	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		\$1.03962		
		Block 2	2,698,481	all additional							\$0.98116		\$0.98128		
	TOTAL										\$3,222.84		\$3,223.27		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		\$0.96538		
		Block 2	0	all additional							\$0.91047		\$0.91143		
	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		\$0.79617		
		Block 2	926,223	20,000							\$0.77027		\$0.77018		
		Block 3	323,675	20,000							\$0.71863		\$0.71857		
		Block 4	84,983	100,000							\$0.68461		\$0.68456		
		Block 5	0	600,000							\$0.63927		\$0.63924		
		Block 6	0	all additional							\$0.58259		\$0.58258		
	TOTAL										\$7,887.38		\$7,886.30		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		\$0.71188		
		Block 2	449,890	20,000							\$0.69043		\$0.69092		
		Block 3	201,897	20,000							\$0.64878		\$0.64915		
		Block 4	59,596	100,000							\$0.62141		\$0.62172		
		Block 5	0	600,000							\$0.58493		\$0.58513		
		Block 6	0	all additional							\$0.53925		\$0.53933		
	TOTAL										\$23,127.56		\$23,146.31		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%
	Intentionally blank														
	[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.														
	[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					

NW Natural
Rates & Regulatory Affairs
2025-2026 PGA Filing - Washington: September Filing
Summary of Deferred Accounts

						Total		
Account	Balance 8/31/2025	Sep-Oct Estimated Activity	Sep-Oct Interest	Estimated Balance 10/31/2024	Estimated Interest During Amortization	Estimated Amount for (Refund) or Collection	Amounts Excluded from PGA Filing	Amounts Included in PGA Filing
A	B	C	D	E	F	G	H	I
				E = sum B thru D	0.00%	G = E + F		
				Excl. Rev Sens				
DSM & LOW INCOME PROGRAMS								
151894	WA DSM AMORTIZATION	47,722	(17,439)	0	30,283			
151898	WA ENERGY EFFICIENCY	108,574	(213,924)	-	(105,350)			
		156,296	(231,363)	0	(75,067)	(75,067)		(75,067)

Company: Northwest Natural Gas Company
State: Washington
Description: Washington EE Amortization
Account Number: 151894
Program under Schedule G
Temp Increment under Schedule 215
UG-181053

Debit (Credit)

Month/Year	Note	Amortization	Transfers	Interest Rate	Interest	Activity	Balance
(a)	(b)	(c)	(d)	(e1)	(e2)	(f)	(g)
Nov-24	<i>NEW</i>	(10,605.59)	147,887.13	0.00%	0.00	137,281.54	340,474.51
Dec-24		(52,424.12)		0.00%	0.00	(52,424.12)	288,050.39
Jan-25		(56,377.64)		0.00%	0.00	(56,377.64)	231,672.75
Feb-25		(62,503.46)		0.00%	0.00	(62,503.46)	169,169.29
Mar-25		(42,711.94)		0.00%	0.00	(42,711.94)	126,457.35
Apr-25		(29,200.89)		0.00%	0.00	(29,200.89)	97,256.46
May-25		(17,656.31)		0.00%	0.00	(17,656.31)	79,600.15
Jun-25		(13,159.50)		0.00%	0.00	(13,159.50)	66,440.65
Jul-25		(10,223.47)		0.00%	0.00	(10,223.47)	56,217.18
Aug-25		(8,494.92)		0.00%	0.00	(8,494.92)	47,722.26
Sep-25	<i>Forecasted</i>	(11,175.61)		0.00%	0.00	(11,175.61)	36,546.65
Oct-25	<i>Forecasted</i>	(6,263.58)		0.00%	0.00	(6,263.58)	30,283.07

History truncated for ease of viewing

Notes

1 - Transfer in amounts from accounts 186310 and 186312 approved for amortization.

Company: Northwest Natural Gas Company
State: Washington
Description: Washington EE True-Up Deferral
Account Number: 151898
Program under Schedules G
Temp Increment under Schedule 215

1	Month/Year	Note	Deferral	Transfers	Activity	Balance
2	(a)	(b)	(c)	(d)	(g)	(h)
3						
4	Beginning Balance					
57	Nov-23	NEW	(464,484.58)	(227,776.96)	(692,261.54)	988,115.95
58	Dec-23		(556,924.55)		(556,924.55)	431,191.40
59	Jan-24		(477,352.77)		(477,352.77)	(46,161.37)
60	Feb-24		637,505.97		637,505.97	591,344.60
61	Mar-24		(437,310.92)		(437,310.92)	154,033.67
62	Apr-24		(259,180.99)		(259,180.99)	(105,147.32)
63	May-24		(197,218.57)		(197,218.57)	(302,365.89)
64	Jun-24		(91,656.81)		(91,656.81)	(394,022.70)
65	Jul-24		1,055,318.64		1,055,318.64	661,295.94
66	Aug-24		(98,052.62)		(98,052.62)	563,243.32
67	Sep-24		(109,482.63)		(109,482.63)	453,760.69
68	Oct-24		923,502.85		923,502.85	1,377,263.54
69	Nov-24	OLD	357.97		357.97	1,377,621.50
70	Nov-24	NEW	(445,689.26)	(147,887.13)	(593,576.39)	784,045.11
71	Dec-24		(648,097.40)		(648,097.40)	135,947.72
72	Jan-25		(532,004.28)		(532,004.28)	(396,056.57)
73	Feb-25		(548,002.11)		(548,002.11)	(944,058.68)
74	Mar-25		590,129.79		590,129.79	(353,928.90)
75	Apr-25		(197,933.05)		(197,933.05)	(551,861.94)
76	May-25		(83,523.63)		(83,523.63)	(635,385.57)
77	Jun-25		(39,816.02)		(39,816.02)	(675,201.59)
78	Jul-25		871,858.47		871,858.47	196,656.88
79	Aug-25		(88,082.88)		(88,082.88)	108,574.00
80	Sep-25	Forecasted	(137,088.38)		(137,088.38)	(28,514.38)
81	Oct-25	Forecasted	(76,835.92)		(76,835.92)	(105,350.30)

History truncated for ease of viewing

NW Natural
Rates & Regulatory Affairs
2025-26 Washington: September Filing
Tariff Advice 25-04: Schedule 215 Effects on Revenue

	<u>Amount</u>
1	
2	
3	<u>Temporary Increments</u>
4	
5	<u>Removal of Current Temporary Increments</u>
6	Amortization of Energy Efficiency Programs (5,308,861)
7	
8	<u>Addition of Proposed Temporary Increments</u>
9	Amortization of Energy Efficiency Programs 5,415,403
10	
11	
12	TOTAL OF ALL COMPONENTS OF RATE CHANGES <u>\$106,542</u>
13	
14	
15	
16	2024 Washington CBR Normalized Total Revenues \$109,949,935
17	
18	Effect of this filing, as a percentage change 0.10%