

250 SW Taylor Street Portland, OR 97204 503-226-4211 nwnatural.com

October 7, 2025

NWN WUTC Advice No. 25-05A / UG-250714

VIA ELECTRONIC FILING

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

Re: UG-250714 - Schedule 230: Temporary Adjustments to Rates for Low-Income 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 230.1 and 230.2 remain unchanged from the September 15th filing.

Proposed Changes

If there were no other adjustments to rates effective November 1, 2025, the effect of Schedule 230 would be a slight decrease to average monthly bills in the primary rate schedules, residential and commercial Schedule 3, of just less than 0.1%. The average Schedule 2 residential customer using 56 therms would see a bill decrease of \$0.05¹ per month, and the average Schedule 3 commercial customer using 236 therms would see a bill decrease 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. If the effects of the temporary rate adjustments were permanent, the rate changes would be a decrease in the Company's revenues from its Washington operations of \$79,010, or 0.07%.

The proposed rate change will affect all of NW Natural's Washington sales service customers. NW Natural currently serves approximately 91,114 residential customers and 7,461 commercial and industrial customers in the Company's Washington service territory.

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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.

Washington Utilities and Transportation Commission UG-250714 - NWN WUTC Advice No. 25-05A October 7, 2025, Page 2

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

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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:

250714-NWN-WUTC-Advice-25-05A-WA-Low-Income-Exh-A-R-Pg-2-10-07-25 250714-NWN-WUTC-Advice-25-05A-WA-Low-Income-Exh-A-R-10-07-25.xlsx

NW Natural Rates & Regulatory Affairs 2025-2025 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		Normal Therms	Minimum	Current	Net Minimum	Proposed	Net Minimum	Current 1/1/2025	11/1/2026	Proposed 11/1/2026	Proposed 11/1/2026	Propose 11/1/20
		Volumes page,	Therms in	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Billing	Current		GREAT & LIEE	
		Column D	Block	Average use	Charge	Avg. Credit	Charge	Avg. Credit	Charge	Rates	Average Bill[2] F=D+(C * E)	Rates	Average Bill K= D+(C*J)	% Bill Ch
Schedule	Block	A	В	c			D			E	F F	J	K K	L
1R		179,824	N/A	20.0	\$5.50	\$1.82	\$3.68	\$1.82	\$3.68	\$1.66830	\$37.05	\$1.67151	\$37.11	
1C		18,807	N/A	114.0	\$7.00	\$5.34	\$1.66	\$5.34	\$1.66	\$1.67264	\$192.34	\$1.67087	\$192.14	
2R		59,991,192	N/A	56.0	\$8.00	\$10.54	(\$2.54)	\$10.54	(\$2.54)	\$1.31527	\$71.11	\$1.31439	\$71.06	
3 CFS		21,359,579	N/A	236.0	\$22.00	\$48.32	(\$26.32)	\$48.32	(\$26.32)	\$1.27854	\$275.41	\$1.27769	\$275.21	
3 IFS		192,102	N/A	975.0	\$22.00	\$129.16	(\$107.16)	\$129.16	(\$107.16)	\$1.23031	\$1,092.39	\$1.22959	\$1,091.69	
27 41C Firm Sales	Block 1	34,823 1.665.389	N/A 2.000	50.0 3.436.0	\$9.00 \$250.00	\$0.00	\$9.00 (\$265.09)	\$0.00	\$9.00 (\$265.09)	\$1.11591	\$64.80	\$1.12302 \$1.03871	\$65.15	
41C Firm Sales	Block 2	2,698,481	all additional	3,430.0	\$250.00	\$515.09	(\$265.09)	\$515.09	(\$205.09)	\$0.98116		\$0.98047		
	TOTAL	2,030,401	un udditionui							Q0.30110	\$3,222.84	\$0.50047	\$3,220.28	
411 Firm Sales	Block 1	331,379	2,000	4,741.0	\$250.00	\$622.72	(\$372.72)	\$622.72	(\$372.72)	\$0.94622	40,000	\$0.94593	70,220.20	
	Block 2	593,487	all additional							\$0.89909		\$0.89883		
	TOTAL										\$3,984.13		\$3,982.83	
41C Interr Sales	Block 1	0	2,000	0.0	\$250.00	\$515.09	\$250.00	\$515.09	\$250.00	\$0.96427		\$0.96372		
	Block 2	0	all additional							\$0.91047		\$0.90997		
	TOTAL										\$250.00		\$250.00	
41I Interr Sales	Block 1	0	2,000	0.0	\$250.00	\$622.72	\$250.00	\$622.72	\$250.00	\$0.90245		\$0.90191		
	Block 2	0	all additional							\$0.85609		\$0.85563		
41C Firm Trans	TOTAL	422.242	2.000	4.540.0	4500.00	6545.00	(045.00)	AF4F 00	(645.00)	40.54044	\$250.00	A0 54044	\$250.00	
41C Firm Trans	Block 1 Block 2	123,243 284,875	2,000 all additional	4,648.0	\$500.00	\$515.09	(\$15.09)	\$515.09	(\$15.09)	\$0.64044 \$0.59302		\$0.64044 \$0.59302		
	TOTAL	284,875	an auuttonal							3U.393UZ	\$2,836.11	şu.593U2	\$2,836.11	
	Block 1	0	2,000	0.0	\$500.00	\$622.72	\$500.00	\$622.72	\$500.00	\$0.62856	32,030.11	\$0.62856	\$2,030.11	
411 FIIIII I I I IIIS	Block 2		all additional	0.0	+500.00		- 500.00			\$0.58256		\$0.58256	l	
	TOTAL	-									\$500.00		\$500.00	
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		\$0.79580		
	Block 2	926,223	20,000							\$0.77027		\$0.76986	l	
	Block 3	323,675	20,000							\$0.71863		\$0.71832	l	
	Block 4	84,983	100,000							\$0.68461		\$0.68436	l	
	Block 5	0	600,000							\$0.63927		\$0.63910		
	Block 6	0	all additional							\$0.58259		\$0.58253		
431 Firm C-1	TOTAL Disabil	007.077	40.000	12.869.0	Ć4 200 0C	62.045.77	/64 707 0C'	\$3,945,77	/64 707 OF	60.72460	\$7,887.38	60 7245-	\$7,881.98	
42I Firm Sales	Block 1 Block 2	887,030 668.287	10,000 20.000	12,869.0	\$1,300.00	\$3,945.77	(\$1,797.95)	\$3,945.77	(\$1,797.95)	\$0.73169 \$0.71258		\$0.73159 \$0.71249		
	Block 2 Block 3	109.048	20,000							\$0.71258		\$0.71249	l	
	Block 4	24,233	100,000							\$0.64957		\$0.67449		
	Block 5	24,233	600,000							\$0.61626		\$0.61622	l	
	Block 6		all additional							\$0.57455		\$0.57453		
	TOTAL	· ·									\$7,563.34	,	\$7,562.08	
42C Firm Trans	Block 1	122,544	10,000	51,470.0	\$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	l	
	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		
42I Firm Trans	TOTAL				4				/4		\$15,708.62		\$15,708.62	
	Block 1 Block 2	933,452 1.354.332	10,000 20.000	63,374.0	\$1,550.00	\$3,945.77	(\$2,395.77)	\$3,945.77	(\$2,395.77)	\$0.40096 \$0.38427		\$0.40096 \$0.38427	l	
	Block 2 Block 3	1,354,332	20,000							\$0.38427		\$0.38427	l	
	Block 4	2.743.941	100.000							\$0.33103		\$0.32922	l	
	Block 5	1,030,134	600,000							\$0.32922		\$0.30009	l	
	Block 6	0	all additional							\$0.26369		\$0.26369		
	TOTAL										\$20,723.22		\$20,723.22	
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		\$0.71109		
	Block 2	449,890	20,000							\$0.69043		\$0.69022		
	Block 3	201,897	20,000							\$0.64878		\$0.64862		
	Block 4	59,596	100,000							\$0.62141		\$0.62127	l	
	Block 5	0	600,000							\$0.58493		\$0.58484	l	
	Block 6	0	all additional							\$0.53925	400 400	\$0.53922	422.440 :-	
42I Interr Sales	TOTAL 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	\$23,127.56	\$0.69031	\$23,119.47	
42I Interr Sales	Block 1 Block 2	171,533 27,036	10,000 20,000	13,/58.0	\$1,300.00	\$3,945.77	(\$2,011.96)	\$3,945.77	(\$2,011.96)	\$0.69064 \$0.67199		\$0.69031 \$0.67169	l	
	Block 2	27,036	20,000							\$0.67199		\$0.67169		
	Block 4	0	100,000							\$0.61048		\$0.61029	l	
	Block 5	0	600,000							\$0.57791		\$0.57780		
	Block 6	0	all additional							\$0.53724		\$0.53719		
	TOTAL										\$7,419.78		\$7,415.35	
12C 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	İ	
	Block 2	0	20,000							\$0.37516		\$0.37516	l	
	Block 3	0	20,000							\$0.34405		\$0.34405	l	
	Block 4	0	100,000							\$0.32360		\$0.32360		
	Block 5	0	600,000							\$0.29633		\$0.29633	l	
	Block 6	0	all additional							\$0.26221		\$0.26221		
	TOTAL				***	4	(4		(4		\$1,550.00		\$1,550.00	
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		
42I Inter Trans	Block 2	1,827,775	20,000							\$0.37758		\$0.37758		
42I Inter Trans	Block 3 Block 4	1,364,376	20,000							\$0.34592		\$0.34592		
42I Inter Trans		4,116,253 1,831,129	100,000							\$0.32511		\$0.32511	l	
42I Inter Trans			600,000							\$0.29736 \$0.26266		\$0.29736		
42I Inter Trans	Block 5		all additional											
421 Inter Trans	Block 5 Block 6		all additional							30.20200	\$20 84E 00	\$0.26266	\$20.84E 00	
42 I Inter Trans 43 Firm Trans	Block 5		all additional	0.0	\$38,000.00		\$38,000.00	0.0		\$0.24685	\$30,845.00 \$38,000.00	\$0.26266	\$30,845.00 \$38,000.00	

^[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.

98 99 Rates in summary Column A

^{22 [2]} Fropscode new CCA rates is equal to Current Billing Rate plus New CCA rates less current CCA rates. Assumes customer receives CCA credit.

33 [3] For Schedules where the average usage would generate a new credit, the non-volumetric credits have been capped at the CCA cost.

35 <u>Sources:</u>

96 Direct inputs per Tariff

97 Direct inputs

98 Per Tariff