

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

NORTHWEST NATURAL GAS COMPANY
dba NW NATURAL,

Respondent.

DOCKET NO. UG-181053

UNOPPOSED MOTION TO
EXTEND COMPLIANCE
DEADLINE

- 1 Under WAC 480-07-385, Northwest Natural Gas Company (“NW Natural” or the “Company”) moves for an order from the Washington Utilities and Transportation Commission (the “Commission”) extending the compliance deadline for the Company’s Gas Residential Energy Assistance Tariff (“GREAT”) Program Advisory Group’s action plan presentation to improve the GREAT Program established in Order 06 from July 1, 2020 to April 1, 2021.¹
- 2 In Order 06, the Commission approved and adopted an all-party joint settlement agreement that resolved all but the contested issue of the Company’s proposed decoupling mechanism, which the Commission also resolved in Order 06. Parties to the joint settlement agreement were the Company, Commission Staff (“Staff”), the Public Counsel Unit of the Washington Office of Attorney General (“Public Counsel”), Alliance of Western Energy Consumers (“AWEC”), and The Energy Project (“TEP”).
- 3 The all-party joint settlement agreement approved and adopted in Order 06 instructed the Company to establish the GREAT Advisory Group with certain parties, a minimum quarterly

¹ Order 06 at ¶ 85.

meeting cadence and a list of specific goals included in the joint settlement agreement. In addition, the parties to the joint settlement agreement specified that the GREAT Advisory Group would present an action plan to improve the GREAT Program by July 1, 2020.²

4 In August 2019, the Company established the GREAT Advisory Group. The GREAT Advisory Group currently consists of representatives from NW Natural, Staff, TEP, Public Counsel, Clark Public Utilities, Washington Gorge Action Program and the Washington Department of Commerce.

5 The GREAT Advisory Group held its first meeting on October 25, 2019, and held subsequent meetings on February 27, 2020, March 26, 2020, and May 27, 2020. During these meetings, Advisory Group members requested certain data from NW Natural that would be necessary in developing ideas for the required action plan. The requested data requires technical system programming resources, which is taking the Company considerable time to coordinate and compile. In addition, the current COVID-19 public health situation has caused delays as NW Natural personnel have had to reprioritize work to accommodate COVID-19 related customer service issues while deploying a work-at-home strategy for NW Natural employees at the same time the Company moved its main corporate operations center within downtown Portland, Oregon. NW Natural has committed to completing the programming needed to gather the requested data and providing this data to the Advisory Group by August 31, 2020. The Advisory Group has agreed that an action plan could be presented by April 1, 2021, which allows for seven months to develop the action plan once the data is provided.

² Joint Settlement Agreement at ¶ 24.

6 Under WAC 480-07-385, the Commission may extend a deadline if the requesting party demonstrates good cause and no other party or the Commission will be prejudiced.

7 Good cause exists to extend the GREAT Program action plan compliance deadline to April 1, 2021. The GREAT Advisory Group members, including NW Natural, believe the future modifications to the GREAT program need to be based on careful data analysis. Due to the press of business and additional work impacts due to COVID-19, the Company will not be able to produce this data until August 31. Another consideration for an extension of the action plan due date is the ongoing rulemaking concerning low-income programs under the Energy Independence Act.³ The extension will allow the GREAT Advisory Group more time to incorporate the new rules in the future program design.

8 The GREAT Advisory Group has agreed that, in an effort to develop a thoughtful action plan, additional time is needed to gather and process the data requested of the Company. The additional time will also provide for more frequent meetings of the Advisory Group to complete the action plan. Accordingly, good cause exists to allow NW Natural additional time to provide the requested data and to allow the GREAT Advisory Group to develop an action plan after reviewing the data and holding meetings at least twice a quarter, an increase to the current quarterly pace.

9 NW Natural has been authorized to represent that the GREAT Advisory Group supports this motion and that AWEC, the only party in this proceeding—and to the stipulation—that is not a member of the GREAT Advisory Group, does not oppose it.

10 The Company, therefore, respectfully moves for an order extending the July 1, 2020, compliance deadline to April 1, 2021.

³ Docket UE-190652.

11 Communications regarding this Petition should be addressed to:

NW Natural
e-Filing for Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204-3038
Telephone: (503) 610-7330
Facsimile: (503) 220-2579
Email: eFiling@nwnatural.com

Rebecca Brown
250 SW Taylor Street
Portland, Oregon 97204-3038
Phone: (503) 610-7326
Email: Rebecca.brown@nwnatural.com

Natasha Siores
250 SW Taylor Street
Portland, Oregon 97204-3038
Phone: (503) 610-7074
Email: natasha.siores@nwnatural.com

12 In addition, NW Natural respectfully request that all data requests be addressed to:

e-Filing for Regulatory Affairs
eFiling@nwnatural.com

Respectfully submitted this 12th day of June 2020.

Respectfully Submitted,

/s/ Ryan Sigurdson
NW NATURAL
Ryan Sigurdson
Attorney
250 SW Taylor Street
Portland, Oregon 97204-3038
Phone: (503) 610-7570
Email: ryan.sigurdson@nwnatural.com