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VIA ELECTRONIC FILING

February 13, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: UG-210831 NW Natural's 2023 Annual Energy Efficiency Plan

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), encloses for filing its 2023 annual Energy Efficiency Plan (Annual Plan) at the request of Washington Utilities and Transportation Commission (Commission) Staff.

NW Natural submitted its 2022-2023 Biennial Energy Efficiency Plan (BEEP) on November 1, 2021, docketed as UG-210831, in compliance with the Company's Integrated Resource Plan Work Plan in docket UG-210094 and in compliance with Order 03 in docket UG-190711. In Order 01 in docket UG-210831 the Commission accepted the BEEP subject to conditions. Those conditions included, among other things, conservation planning and reporting through a biennial conservation plan, an annual conservation report and a biennial conservation report. While an annual conservation plan was not contemplated in those conditions, discussions with Commission Staff have indicated a belief that an annual conservation plan is required.

The requirement for an annual conservation plan was agreed to in a joint stipulation approved by the Commission in Order 06 of the Company's general rate case in docket UG-181053.¹ However the passage of HB 1257, which requires biennial conservation plans, as well as Order 01 in docket UG-210831, should have effectively eliminated the annual conservation plan requirement in favor of the comprehensive conservation and reporting requirements in the BEEP and in Order 01 of docket UG-210831. Moreover, the terms concerning conservation in the UG-181053 general rate case stipulation, themselves, recognize that they would be superseded by subsequent legislation (HB 1257) that requires biennial conservation plans:

“The Parties understand that new laws, such as those enacted by the passage of House Bill (“HB”) 1257 (An Act Relating to Energy Efficiency), which the Governor signed into law (Chapter 285, 2019 Laws) effective July 28, 2019, or new or amended Commission rules with respect to natural gas energy efficiency, may supersede the terms of this Agreement and may require the Company to modify its energy conservation plan and compliance with the terms listed below.”²

¹ *Washington Utilities and Transportation Commission v. Northwest Natural Gas Company, d/b/a NW Natural*, Docket UG-181053, Order 06 at ¶ 74 (Oct. 21, 2019).

² Docket UG-181053, Settlement at ¶ 20.

While NW Natural maintains that the Commission's acceptance of the 2022-2023 BEEP effectively eliminated the need for an annual conservation plan for 2023, out of an abundance of caution and in deference to Commission Staff, the Company provides the enclosed 2023 Annual Plan.

In addition, NW Natural shared this 2023 Annual Plan on January 23, 2023, with its Energy Efficiency Advisory Group in advance of this filing and there were no questions or comments received.

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

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Sincerely,

/s/ Rebecca Trujillo

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Attachment:
210831-NWN-2023-AnnualEEPlan-02-13-2023

cc: EEAG