



NW Natural[®]

Annual Energy Efficiency Plan

2023

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I. Executive Summary

In accordance with the Washington Utilities and Transportation Commission's requirements, Northwest Natural Gas Company, dba NW Natural ("NW Natural" or the "Company") presents this 2023 Annual Energy Efficiency Plan ("Annual Plan"). This Annual Plan coincides with the 2022-2023 Biennial Energy Efficiency Plan ("BEEP") and outlines the budgets and projected savings for 2023. The Annual Plan also describes program updates and strategic actions being taken to meet Biennial Therm Saving Goals set forth in the 2022-2023 BEEP.

Table 1. 2022-2023 Biennial Energy Efficiency Plan Summary

Program Track	Biennial Therm Savings Goals	Biennial Budget
Commercial Incentive Program	351,447	\$2,709,748
Residential Incentive Program	255,905	3,182,266
Low-Income Weatherization	13,563	302,163
NEEA Market Transformation	TBD	176,296
RTF Regional Collaboration	N/A	21,400
Pilot & Trial Programs	TBD	-
Evaluation	N/A	-
EE Plan Total	620,915	\$ 6,391,873
CPA Savings Target	619,200	N/A

1.1 2023 Budget and Goals

Projected savings for 2023 are slightly lower than what was originally anticipated in the BEEP. The lower savings are in part due to the program landscape with changing codes and lingering supply chain delays. The Company saw strong performance in its programs in 2022, and even with a decrease in 2023 savings, NW Natural still anticipates being able to meet its Biennial Conservation Goal. While forecasts are slightly lower for 2023, the Company is exploring new offerings that will bring in more savings in the following biennium.

Table 2. 2023 Annual Energy Efficiency Plan Summary

Program Track	2023 Therm Saving Goal	2023 Budget
Commercial Incentive Program	169,245	\$1,696,286
Residential Incentive Program	112,663	1,556,820
Low-Income Weatherization	5,425	165,318
NEEA Market Transformation	N/A	88,148
RTF Regional Collaboration	N/A	10,800
Pilot & Trial Programs	N/A	140,596
2023 Totals	287,333	\$3,657,968

1.2 Cost Effectiveness

Table 3. 2023 Projected Cost-Effectiveness

Anticipated Program Performance	2023
Incentive Program UCT	1.85
Incentive Program TRC	1.70
Levelized Cost	\$0.872

II. Background

NW Natural began offering energy efficiency programs to Washington customers on October 1, 2009. The Washington Utilities and Transportation Commission (“WUTC”) directed the Company to create and begin offering a program in the Company’s 2008 rate case, docketed as UG-080546.

Since the inception of the Company’s energy efficiency programs, the programs have continued to evolve under the direction and oversight of the Energy Efficiency Advisory Group (“EEAG”).

2.1 History

The Company began using Energy Trust of Oregon (“Energy Trust”) as the delivery arm for its Oregon energy efficiency programs in 2003. Since the Company’s Washington service territory is contiguous with its Oregon territory, it made sense in 2009 to have Energy Trust to extend the boundaries of their gas offerings into Washington.

As agreed in UG-080546, Energy Trust implemented the Company’s incentive program for one pilot year. During this time, the EEAG monitored the program’s performance and assessed whether Energy Trust should be the ongoing implementer. On May 25, 2011, NW Natural made a compliance filing in UG-080546 wherein it stated the EEAG’s opinion to allow Energy Trust to continue delivering the Company’s energy efficiency incentive programs in Washington. On June 8, 2011, Public Counsel separately filed a letter supporting this decision.

2.2 Oversight

All Washington energy efficiency programs are reviewed by the EEAG, which includes representatives from NW Natural, Energy Trust, WUTC Staff, Public Counsel, Alliance of Western Energy Consumers (“AWEC”), The Energy Project, and the NW Energy Coalition (“NVEC”). Quarterly meetings are held to update the EEAG on program activities throughout the year. Additional meetings are held as needed to consult the group prior to making any significant program changes. The Company provides drafts of annual reports, conservation plans, and tariff adjustments to the EEAG for review.

2.3 Program Delivery

The Company’s programs are currently delivered to customers through partnerships and contracts with third parties.

The Residential and Commercial incentive program is offered through Energy Trust. Energy Trust is an independent, nonprofit organization dedicated to helping utility customers save energy. Energy Trust was formed in 2002 in response to Oregon legislation that restructured electric utilities¹.

The Washington Low Income program (“WA-LIEE”), including outreach and delivery, is provided through local community action agencies. The local community action agencies are Clark County Community Action Agency and Community Action Council of Lewis, Mason and Thurston Counties which serve the Company’s territory in Klickitat and Skamania Counties.

Regional collaborative efforts funded from multiple utilities include market transformation administered by the Northwest Energy Efficiency Alliance (“NEEA”) and technical collaborative efforts through the Northwest Power & Conservation Council’s Regional Technical Forum (“RTF”).

The Industrial Audit pilot is being delivered by Energy 350. Energy 350 is an energy efficiency consulting firm in Portland, OR. They have been implementing energy efficiency programs through Energy Trust in Oregon for the past 12 years.

2.4 Programs Offered

NW Natural supports energy efficiency through several different channels to promote widespread uptake and encourage market transformation in the region. The following are the various programs and tracks offered in Washington.

2.4.1 Incentive Program

NW Natural’s incentive programs serve both residential and commercial customers on eligible rate schedules. The residential program works with builders and homeowners to increase efficiency of newly constructed homes and support upgrades and retrofit efforts in existing homes. The commercial program incentivizes select measures in commercial facilities; including but not limited to office buildings, restaurants, schools, retail stores, and multifamily housing.

Residential Standard Track (Existing Home Retrofit)

Residential customers with gas heated homes are offered incentives for cost-effective weatherization measures and certain efficient gas appliances. Customers are encouraged to work with trade allies to ensure they are being provided accurate information and access to the most efficient equipment and services. Online home energy reviews are also available wherein an energy use estimation tool identifies incentives and qualifying insulation and weatherization measures that could be installed to improve the efficiency of customers’ homes.

Residential Multifamily Track

Multifamily buildings are offered a specialized subset of the Residential Stand Track incentives. Due to the usage profile of Multifamily buildings, there are unique measures within this sub sector. Condos, townhomes, duplexes, triplexes and fourplexes and stacked (2-4) units qualify for incentives. Multifamily properties that are served with commercial rate schedule gas service are served through the Commercial Program.

¹ Oregon’s SB 1149, codified as ORS 757.612, mandated the creation of an independent entity capable of providing demand side management services to utility customers.

Residential Mid-Stream Track (Supply Chain)

Mid-stream focuses efforts and incentives toward distributors to encourage them to stock and promote the sale of efficient equipment to contractors and residential customers. Technologies that are included in the mid-stream efforts include gas fireplaces and gas tank water heaters.

Residential New Homes Track

EPS (Energy Performance Scoring) New Homes is a whole-home, performance-based offering which encourages builders to construct homes to an energy efficiency standard that is better than the Washington building code. EPS is a trademarked name of an energy performance scoring tool that aims to highlight the benefits of energy-efficient new homes. The Company offers an energy performance score that rates the efficiency of a home and measures it against similar sized homes. Qualifying new homes must also meet new construction best practice criteria established by the EPS New Construction (homes) Program. The compliance of all new homes is verified through an inspection process and homes are issued a score, called an EPS, upon completion.

In 2022, a new Code Credits pathway was introduced to leverage the energy credit structure of the 2018 Washington State Residential Energy Code ("2018 WSEC-R"). This prescriptive offering provides incentives to builders who earn more credits beyond what is required by code. Compliance with this path is audited by independent, third-party verifiers, who provide a report of a home's code credit total to the Residential Program. To qualify for program incentives, all builders must comply with the 95 AFUE furnace credit, and the 0.91 UEF water heater credit if using gas water heat. The Code Credits engagement strategy will award standard incentives for every half point a home achieves greater than code. Since builders can meet credit requirements through a mix of measures, including solar, we will monitor and report on this occurrence.

Community Partner Funding

Community Partner Funding (CPF) is a pathway that provides increased incentive offers exclusively for community-based organizations to serve underserved populations living in single-family homes.

Commercial Custom Track

The Commercial Custom Track acquires gas savings through incentivizing energy efficient capital projects and operations and maintenance ("O&M") upgrades in complex and non-standard situations. The Program Management Contractor's account managers and engineering firms work together to identify and quantify saving opportunities at commercial facilities.

Commercial Standard Track

The Commercial Standard Track provides incentives for standard measures with predetermined (deemed) savings for buildings of all sizes across approved market sectors. The program promotes measures through customer outreach and cultivation of trade ally contractors.

Commercial Strategic Energy Management ("SEM")

The Commercial Program launched its SEM offering in 2022 in collaboration with Clark Public Utility District ("Clark PUD"). SEM is an offering that provides tools and education to businesses and facility managers to save energy through operation management. SEM participants will learn how their

business uses energy and identify where waste is happening. Participants have the opportunity to share best practices with a cohort of peers, learn to increase employee engagement and monitor the progress of their energy savings work.

2.4.2 Low-Income Energy Efficiency

NW Natural's low-income energy efficiency program ("WA-LIEE") is provided by community action agencies. The agencies provide weatherization services, health and safety repairs, and energy education services to qualifying customers at no charge. Program details are available in the Company's Schedule I, "Washington Low Income Energy Efficiency Program".

2.4.3 Market Transformation

The Company views the regional gas market transformation initiative led by NEEA as a necessary investment in the future of gas demand side management ("DSM") and as an enduring component of regional power planning. NEEA's primary work, as it pertains to gas energy efficiency, on behalf of the Pacific Northwest is focused on two strategic goals: 1) bring energy efficient emerging gas technologies to market, and 2) create the market conditions that will accelerate and sustain the market adoption of emerging energy efficient gas technologies.

2.4.4 Pilots & Trial Programs

The Company offers pilots from time to time to test and evaluate new program or measure opportunities. Pilots should have defined objectives or purposes and will be limited in duration. The Company may also pursue trial programs in an effort to take advantage of time sensitive opportunities, drive program uptake or to adaptively manage existing programs.

In 2022, the Company developed an Industrial Audit Offering pilot to better understand the savings potential of the industrial sector and inform future program structure. The pilot will continue through 2023 and the results will be used to develop a standing program in the 2024-2025 biennium.

In 2023, NW Natural will look at developing a Residential Behavioral Pilot. The pilot will be a Home Energy Report style program that provides customers with insights into their usage and recommendations for reducing their consumption. Pilot is contingent on cost effectiveness and EEAG approvals.

2.5 Cost Effectiveness Standards

Cost effectiveness is measured by comparing the benefits of an investment with the costs using the Total Resource Cost test (TRC) and the Utility Cost test (UCT). These are important metrics used to demonstrate that rate-payer funds are being responsibly used.

2.6 Cost Recovery

The Incentive Program, Market Transformation, Regional Technical Forum, Evaluations, Pilots, and all other Energy Efficiency expenses related to Schedule 215 are forecasted for the twelve-month period beginning each November 1. Any differences between the forecast and actual dollars spent during the twelve months will be deferred and either credited or surcharged to customers based on over or under collection through rates. Schedule 230 costs will be deferred and later amortized for recovery from applicable customers on an equal percent of margin basis as established annually in the temporary rate adjustments. The Company will annually submit a stand-alone filing concurrent with its Purchased Gas

Adjustment (“PGA”) filing, for cost recovery of its energy efficiency program forecast under Schedule 215 and historical expenses for the prior calendar year on Schedule 230.

III. 2023 Energy Efficiency Plan

3.1 Current Program Landscape

Over the course of 2022, policy and code changes have impacted NW Natural’s energy efficiency programs. Washington’s current residential code went into effect in February 2021. This change made it more expensive to build a single-family home with gas compared to electricity – with the cost differential varying depending on the home size, equipment choices, and shell measures selected. While some homebuilders continued to build smaller homes with gas space heating throughout 2022, a new residential code that prohibits conventional gas furnaces and water heating will go into effect in 2023. Similarly on the commercial side, gas space and water heating will be prohibited in new construction and renovations with very limited exceptions. With these code changes programs are now expected to see less savings through new construction tracks than originally planned in the 2022-2023 BEEP.

Other important legislation impacting programs includes the Climate Commitment Act. 2023 will be the first year of carbon regulation in the state of Washington. With the purchase and sale of allowances there may be additional funding not outlined within the Annual Plan. Understanding how funds can be used will be determined over the course of the 2023 program year.

3.2 Incentive Program

3.2.1 Residential

Energy Trust helps single-family homeowners and small multifamily property owners served by NW Natural in Southwest Washington save energy through cash incentives for efficient space heating and controls, smart thermostats, water heating, insulation, windows and behavioral actions and education. Energy Trust also offers trade ally support, financing with repayment through utility bills and market interventions. The program influences new residential construction by engaging with builders to increase energy efficiency of new homes through incentives, education, trade and program ally support and quality assurance.

2023 Energy Trust Key Residential Activities

- Expand collaborations with community-based organizations to bring capital measures to new customer segments through Community Partner Funding. Community Partner Funding offers increased incentives through community-based organizations to support programs for customers Energy Trust has underserved who are living in detached single-family homes.
- Explore coordination opportunities with Clark Public Utilities on increased incentive distribution to populations we have underserved through the Community Partner Funding program and revitalize in-person events such as events with Planet Clark, the Building Industry Association, Clark County Rental Association, and other entities.
- Increase participation in smart thermostat measures by expanding the thermostat qualified products list, increasing downstream incentive opportunities, and implementing distributor incentive pathways.

- Redesign efficient window offering to reach customers in need of retrofit assistance through community partnerships and highlight non-energy benefits of window replacement for all customers.
- Coordinate with NW Natural to research opportunities to implement a residential behavioral program for single-family homeowners in Washington.

3.2.1 Commercial

NW Natural provides incentives and technical support to business customers in Southwest Washington on qualifying NW Natural commercial firm or interruptible rate schedules. Offers include incentives for energy-efficient equipment purchased through trade allies or vendors, incentives for operations and maintenance improvements, and no-cost technical studies to estimate energy savings and incentives for retro-commissioning. The program also provides incentives for the Building Operator Certification course. Projects include upgrades and retrofits at existing commercial buildings, energy-efficient equipment for new construction, energy-efficient equipment and retrofits at existing and new multifamily properties with two or more units, and upgrades for natural gas-heated production greenhouses.

2023 Energy Trust Key Commercial Activities

- Boost marketing activities to drive interest in available measures and promote bonuses when available through appropriate marketing channels and outreach.
- Create more in-person and online trade ally engagement opportunities to build stronger relationships with contractors.
- Increase community engagement to better reach customers new to energy efficiency.
- Increase in-person events in line with pandemic restrictions including with organizations such as local chambers, Vancouver Business Journal, Downtown Vancouver Business Improvement Association and Columbia River Economic Development Council.
- Expand collaborative customer engagement activities with Clark Public Utilities for Strategic Energy Management recruitment, technical analysis studies and lead generation

3.3 Low Income

3.3.1 Program Goals

The goal of the low-income program is primarily to address underserved markets and customers that do not have access to the energy efficiency incentive programs. For whole home efforts, WA-LIEE leverages funds provided by other state, federal and local agencies. Those leverage funds also utilize Savings to Investment Ratio (SIR) tests or approved measure lists.

The WA-LIEE program strove to weatherize 25 homes in the 2022-2023 program years. Supply chain delays, reduced outreach due to COVID-19, and staff turnover have limited the number of low-income projects. The WA-LIEE 2023 goal has been adjusted to reflect the impacts from the previous year's challenges. A breakout of savings estimates is reflected below.

Table 4. WA-LIEE 2023 Goals

WA-LIEE	Adjusted 2023 Goal
Number of Homes Weatherized	10
Furnace Only	10
Therm Savings	5,425

3.3.2 Anticipated Program Updates

We are working closely with our partner agency, Clark County, to increase program funding available for whole home weatherization projects. We see a need for an increase in health and safety funds in order to help homes meet the standards necessary to get them weatherized. We are proposing a \$4,000 flexible spending increase per year, per project, toward health and safety measures or additional energy efficient measures. We are optimistic that the increase in program funding will result in more weatherization projects for program year 2023.

In addition to the proposed program increase, we are proposing \$10,000 in additional funding for an impact evaluation report. We are hopeful that a program evaluation will help us determine if there are any gaps in our programming and assist us in making the necessary improvement to our program to better serve our customers.

The adjusted program budget reflects changes in our program goals as well as the increased funding proposed for program year 2023.

Table 5. WA-LIEE 2023 Budget

WA-LIEE	Budget
WA-LIEE Measures	\$74,090
Health / Safety	10,000
Furnace Only	20,000
WA-LIEE Agency Administration (25%)	6,023
WA-LIEE application processing admin (5% cap)	5,205
WA-LIEE Impact Evaluation	10,000
\$4,000 per project flexible funding	40,000
Current WA-LIEE Total	\$165,318

3.4 Gas Market Transformation

The Company will continue its participation with NEEA in 2023. The NEEA budget is on track and in line with the 5-year business plan spanning 2020-2024. Actual expenditures are based on invoiced totals arising from the actual progress of NEEA during the year. NEEA budget has not changed from the BEEP and is anticipated to be \$88,148 in 2023. Due to the volatility in savings attributed to market transformation, the forecasted savings are not included in the plan.

3.5 Pilot & Trial Programs

NW Natural investigates new opportunities and programs through pilot projects. These programs and offerings are developed in consultation with the EEAG. Pilots are temporary offerings used to create new programs or support efforts to enhance and drive existing offerings.

3.5.1 Industrial Audits

In the 2021 CPA, cost-effective savings were identified in the Industrial sector. Historically, Industrial customers in Washington have not received energy efficiency services through the Company. NW Natural outlined in the 2022-2023 BEEP a plan to offer “Enhanced Energy Services.” After discussions with the EEAG an Industrial Audit Offering was determined to be a reasonable first step for establishing a program. In 2022, Energy 350 was selected to be the implementor of this pilot.

NW Natural will be offering these audits throughout 2023 to help inform the development of an Industrial program that is expected to launch in 2024.

3.5.2 Residential Behavioral Pilot

The 2021 CPA identified savings potential for residential behavioral programs. The savings were excluded from the 2022-2023 due to the lead time and data integration lift associated with establishing a program.

In 2023, the Company plans to solicit responses for an RFI to understand the complexities and estimated costs of launching a Home Energy Report (“HER”) style program. Results of the RFI will be brought to the EEAG before moving forward with pilot. Contingent on approvals, the Company plans to launch the pilot in 2024. Given the uncertainties in this offering the budget is still to be determined.

3.5.3 Gas Heat Pump Water Heaters

For the last few years, the Company has been collaborating with NEEA, the North American Gas Heat Pump Collaborative, and various manufactures to promote commercialization of gas heat pump technology. Gas heat pump water heaters have the potential to be twice as efficient as baseline products, providing high long-term savings for our gas customers.

Delays in manufacturer development have pushed back the Company’s plan outlined in the BEEP to promote this technology in 2023. While commercial units are on the market the residential units are still not readily available for consumers.

3.6 Regional Technical Forum

The Company has agreed to support the work of the Regional Technical Forum’s 2020-2024 Business Plan. The work of the RTF will assist the Company in developing and acquiring cost-effective conservation through research and evaluation of conservation investments.

3.7 Loans and On-the-Bill Repayment Services

The Company will continue to provide access to a low-interest, unsecured financing offer to residential homeowners who heat their homes with natural gas. The program lender will originate loans granted for the purposes of purchasing and installing conservation and energy efficiency measures incented by the existing homes program, and the Company will provide billing and remittance services to the program lender by placing the loan repayment fee on the participating customers' monthly gas bill. Customers who obtain a loan with on-the bill repayment services will receive a loan repayment charge itemized as "Energy Upgrade Loan" on their monthly bill for natural gas service. This will be reflected for the term of the loan or until the loan has been paid off, transferred, or otherwise discharged or removed from the bill in accordance with the terms and conditions of the Company's service agreement. The Company will lead and manage the coordination of activities between the program lender, the program management contractor, and the Company.

IV. Reporting

4.1 Evaluation Activities

4.1.1 Impact Evaluations

Annual savings reported by the Company are based on the assumed gross savings for each measure. The assumed savings are consistent with the most current impact studies performed on the programs and measures. The Company or third parties perform impact studies used to validate the engineering assumptions used in setting biennial as conservation targets. Impact evaluations of residential measures typically include analysis of a group of customers' energy usage data before and after a measure is installed (i.e., billing analysis). Non-residential measures receive a combination of engineering review of key algorithms and parameters, a document review of project files and specific building-level model inputs, and site visits to verify operational patterns and installation practices that affect savings estimates.

Savings from all measures are evaluated on a regular basis by the program implementer based on accepted practice, program activity, staff resources and evaluation priorities (unless sample sizes based on participation rates are not statistically significant). From the impact evaluation, a determination is made by the Company if evaluated savings are consistent with assumed savings. If they are not, the deemed savings values are "adjusted" by the program implementer to reflect the relevant evaluation findings. The adjustment of savings is accomplished through a combination of savings realization adjustment factors ("SRAF") and through updating the deemed savings values expressed in the measure approval documents ("MADs"). A link to the Impact Evaluation as well as a short summary of the results will be provided in the Annual report.

4.1.2 Process Evaluations

The Company or program delivery contractor may, as appropriate, contract with a third-party evaluation contractor to perform process evaluations on a subset or on all energy efficiency programs, WA-LIEE, pilots, and other efforts offered. The third-party evaluation contractor studies the programs and reports on the processes employed for each program with recommendations for improvement. A link to process evaluations, as well as short summaries of the results, will be provided in annual reports following the Process Evaluation Report's release.

4.2 Conservation Potential Assessment

In 2019, HB 1257 was passed in Washington requiring utilities to acquire all cost-effective energy efficiency. Cost-effective energy efficiency is determined through a Conservation Potential Assessment (“CPA”) that is conducted by an independent third party. The CPA is conducted every odd year and sets the upcoming 2-year goal for the BEEP.

For the 2023 CPA, NW Natural is planning to use Applied Energy Group (“AEG”). AEG is an energy consulting firm that conducted the Company’s 2021 CPA. Due to timing constraints NW Natural decided to use AEG again to streamline the process. During the first half of 2023 NW Natural will be working with AEG and other stakeholders to develop the CPA.

Costs for the CPA are built into rates and spread across all Washington customers. Key dates for the process are outlined below.

Table 6. CPA Timeline

Milestone	Date
Project Kick off Meeting	February 1st
EEAG Q1 Meeting	March 22nd
Draft CPA Results	May 3rd
Draft CPA Report	May 10th
Draft 2023 BEEP	May 15th
EEAG Q2 Meeting	May 24th
Final CPA Results	May 31st

4.3 2022 Annual Report

NW Natural will file the 2022 Annual Conservation report on or before June 15, in the same docket as its current biennial conservation report regarding its progress in meeting its conservation target during the preceding year.

The annual report will include:

- 1) The biennial conservation target.
- 2) Planned and claimed gas savings from conservation, including a description of key sources of variance between the planned and actual savings.
- 3) Budgeted and actual expenditures made to acquire conservation.
- 4) The portfolio- and program level cost-effectiveness of the actual gas savings from conservation.
- 5) All program evaluations completed in the preceding year.
- 6) A discussion of the steps taken to adaptively manage conservation programs throughout the preceding year.

4.4 2024-2025 Biennial Energy Efficiency Plan

NW Natural will file the 2024-2025 BEEP on or before November 15, 2023. The plan will establish a biennial conservation target based on the CPA and describe program activities planned for the biennium. All plan requirements are listed in the Biennial Conservation Plan Conditions filed in docket UG-210831.