

Annual Energy Efficiency Plan 2025

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1. Executive Summary

In accordance with Washington Utilities and Transportation Commission's guidance, Northwest Natural Gas Company, dba NW Natural ("NW Natural" or the "Company") presents this 2025 Annual Energy Efficiency Plan ("Annual Plan"). This Annual Plan coincides with the 2024-2025 Biennial Energy Efficiency Plan ("BEEP") and outlines updated budgets and projected savings for 2025. The Annual Plan also describes program changes and strategic actions being taken to meet Biennial Therm Saving Goals set forth in the 2024-2025 BEEP.

Table 1: 2024-2025 Biennial Energy Efficiency Plan Summary

2024-2025 EE Plan Sur	Biennial Savings Goal (therms)	Biennial Cost	
Incontivo Programs	Commercial	286,592	\$2,862,137
Incentive Programs	Residential	229,062	\$4,293,345
Low-Income	WA-LIEE	8,680	\$283,885
Market Transformation*	NEEA	60,000	\$329,353
Dilate & Trial Programs	Behavioral	205,708	\$753,756
Pilots & Trial Programs	Industrial	TBD	\$150,000
Regional Planning	RTF	N/A	\$26,100
Conservation Potential Assessment	СРА	N/A	\$150,000
Program Validation	Evaluation	N/A	\$160,000
Biennial	790,0	42	
	\$9,008,	576	
	720,0	00	

^{*}Market Transformation savings are estimates based on NEEA's savings projection range. There is a high degree of uncertainty with savings projection.

1.1 2025 Budget and Goals

Projected savings for the 2025 Energy Trust incentive programs is lower than what was originally anticipated in the 2024-2025 BEEP. The lower savings are in part due to changing codes and lingering impacts from the pandemic. Current year-end forecasts for the 2024 program year show the residential and commercial incentive programs may be under their 2024 goals as well. The introduction of the Behavioral Energy Efficiency ("BEE") Pilot is anticipated to mitigate the shortfall in the incentive programs in both 2024 and 2025. The BEE Pilot has reported savings well above the target goal in 2024, which has informed the updated goal numbers for 2025. While the bump in savings from the BEE Pilot puts us well above the 2025 BEEP goal, it is important to note that these are unevaluated savings. NW Natural is currently undergoing an impact evaluation which will identify overlap with the incentive program and verify the actual reportable savings. Due to the high uncertainty around the BEE Pilot savings, NW Natural will continue to closely monitor the programs and look for new opportunities to bring in additional savings to hit the Biennial Savings Target.

Table 1. 2025 Annual Energy Efficiency Plan Comparison Summary

Program	BEEP 2025 Budget	Updated 2025 Annual Budget	BEEP 2025 Savings Goal (therms)	Updated 2025 Savings Goal (therms)
Energy Trust	\$ 3,844,395	\$ 3,643,981	271,415	219,054
WA-LIEE	177,428	96,200	5,425	1,000
NEEA*	241,204	241,204	40,000	40,000
BEE Pilot*	281,175	315,541	112,684	266,327
Industrial	150,000	150,000	0	0
NWPCC RTF	15,000	14,400	N/A	N/A
Evaluations	100,000	100,000	N/A	N/A
СРА	150,000	150,000	N/A	N/A
Total	\$ 4,959,202	\$ 4,711,326	429,524	526,381

2. Background

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.

2.1 Incentive Program

NW Natural's incentive programs serve both residential and commercial customers on sales rates. The programs are delivered by The Energy Trust of Oregon ("Energy Trust") to provide consistent cost-effective programming through NW Natural's service territory. The residential program works with contractors and homeowners to increase efficiency upgrades in residential dwellings and the commercial program incentivizes energy efficiency projects in small to large businesses.

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.

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

Historically, the Residential New Homes Track operated as a performance-based offering which encouraged builders to construct homes to an energy efficiency standard that exceeded the Washington building code.

With the introduction of the 2021 Washington State Energy Code ("2021 WSEC-R") that went into effect on March 15, 2024; the residential code has become too stringent to build a gas-heated home beyond what is already required. Due to the reduced opportunity, the residential whole-home program for new construction will be ending in 2024. However, the program will still provide a smart thermostat offering to newly built gas heated homes.

Community Partner Funding (CPF)

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.

The Program will continue to explore this as an offering in 2025 but does not have any current CPF partnerships serving SW Washington.

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

2.2 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".

2.3 Market Transformation

Market transformation is a strategy for reducing barriers to promote the presence of energy efficiency technology in the marketplace. NW Natural is a funder of the regional gas market transformation initiative led by the Northwest Energy Efficiency Alliance ("NEEA") as a necessary investment in the future of gas demand side management ("DSM"). NEEA's purpose is to bring together utilities and partners to pool resources and share risks to transform the market for energy efficiency to the benefit of all consumers in the Northwest.

2.4 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.

Industrial Audit Pilot

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 wrapped up in 2024, and the results of the limited time offering will be used to inform a future incentive program. Development of the program is planned for 2025.

Behavioral Energy Efficiency Pilot

The BEE Pilot is a home energy report style program that provides residential participants with monthly digital summaries of the natural gas usage and quarterly paper reports. The reports provide insights into a customers' usage and tips for reducing energy consumption. The pilot launched in October of 2023 and is slated to run for 3 years.

2.5 Cost Recovery

The Incentive Program, Market Transformation, Regional Technical Forum, Evaluations, Pilots, and all other market rate energy efficiency expenses related to Schedule 215 are forecasted for the twelvemonth 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. The Low-Income Energy Efficiency program is covered under Schedule 230 where costs are 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.

3. 2025 Energy Efficiency Plan

3.1 Current Program Landscape

Over the course of 2024, policy and code changes have impacted NW Natural's energy efficiency programs. State building code updates have essentially prohibited builders from using gas as the primary heating source in new construction. Due to this change, the whole home program for new construction had been planning to exit the market in 2024. However, in November 2024, Initiative Measure No. 2066 passed which may have implications for the state building codes. NW Natural and Energy Trust will continue to engage with builders and continue to assess the opportunity within the new construction market.

In addition to building codes, House Bill 1589 was passed by the state legislature in March 2024. While the bill only applied to Puget Sound Energy, there were implications for the regional work being done by NEEA. As a result, NEEA revised their 5-year plan to accommodate funding restrictions and shifted the focus of the gas portfolio to commercial sector and fuel neutral programs. Like building codes, Initiative Measure No. 2066 may potentially impact HB 1589 but will not likely result in directional change for NEEA programs. This will likely slow down the development and adoption of residential gas heat pump water heaters in the region.

The Climate Commitment Act ("CCA") began in 2023 and was the first year of carbon regulation in the state of Washington. With the purchasing and sale of allowances there may be additional funding for energy efficiency activities not currently outlined in this plan.

3.2 Energy Trust – Incentive Programs

Energy Trust is anticipating a decline in the anticipated savings for the 2025 program year and a slight decrease in expenditure.

Table 3. Energy Trust 2025 Program Budget

Program	2025 BEEP Budget	2025 Updated Budget	Percent Change
Residential	\$ 2,238,631	\$ 2,068,076	-8%
Commercial	\$ 1,605,764	\$ 1,575,906	-2%
Energy Trust Total	\$ 3,844,395	\$3,643,981	-5%

Table 4. Energy Trust 2025 Savings Goals

Program	2025 BEEP Savings Goal (therms)	2025 Updated Goal (therms)	Percent Change
Residential	118,002	96,931	-18%
Commercial	153,413	122,123	-20%
Energy Trust Total	271,415	219,054	-19%

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 and distributor incentives.

2025 Context

We are responding to the following conditions and drivers:

- 2025 is the second year of a two-year savings goal.
- The single-family rental and small multifamily markets in Southwest Washington remain strong with steady year-over-year participation, particularly where incentives are higher for property ownership groups.
- Due to a new Washington Residential Energy Buildings code, the 2025 program year will be the first in which Energy Trust will no longer deliver a whole-home offering for residential new construction in Southwest Washington.

2025 Significant Activities

- Increase engagement with single-family and rural customers in Southwest Washington through expanded trade ally recruitment, targeted marketing initiatives and community events.
- Promote increased incentives for market rate gas furnaces first introduced in Q3 of 2024, while
 also encouraging wider trade ally participation in new Savings Within Reach gas furnace
 incentives for income qualified households. Provide marketing and outreach assistance to the
 trade ally network to maximize the potential of reinvigorated gas furnace incentives.
- Expand marketing investments and develop marketing campaigns to both reengage past
 participants and acquire new customers, as well as to support the continued success of key
 market segments including windows, gas furnaces in rentals and the launch of new Savings
 Within Reach WA incentives.
- Expand engagement and recruitment of insulation installers into the trade ally network to increase insulation project and savings volumes. Promote durable measures such as ceiling, wall and floor insulation.
- Continue collaboration with Clark County's Planet Clark and Clark Public Utilities on trade ally education, recruitment and community events.

3.2.2 Commercial

Incentives and technical support are provided to business customers in Southwest Washington on qualifying commercial 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.

2025 Context

We are responding to the following conditions and drivers:

- The program is preparing for impacts to commercial customers with the Washington State's Building Performance Standards that will go into effect in 2026.
- Washington commercial building code has banned gas in new buildings permitted after July 2023. The program experienced a stop of custom new construction projects in 2024, which is anticipated to continue in 2025.

2025 Significant Activities

- Increase outreach to local chambers, Vancouver Business Journal, Hispanic/Latino-owned businesses, the Downtown Business Association, and others to increase program awareness.
- Host quarterly targeted outreach campaigns for active and new Trade Allies in Southwest Washington. Use meetings to review program updates and educate allies on project submission.
- Promote Building Operator Certification program participation to non-strategic energy management (SEM) participants through individual customer contact.
- Deliver targeted marketing campaigns to small business customers in rural areas that promote insulation and HVAC measures.
- Continue increasing the Strategic Energy Management (SEM) program participation through the
 existing partnership with Clark Public Utilities and Energy Trust Southwest Washington customer
 sites and increased effort to offer the Building Operator Certificate training.
- Expand lead generation and communications to support NW Natural's Major Account Services Managers.
- Meet with Clark Public Utilities' Commercial Account Manager(s) quarterly to discuss customer trends, needs and leads for potential project acquisition and partnership.

3.2 Low Income

3.2.1 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.

In 2024, NW Natural continued to see furnace tune-ups as the predominant project type in the Clark County area. While the annual project goal of 6 is on track to be met, the limited savings associated with furnace replacements and tune-ups makes it unlikely that the annual savings target for 2024 will be achieved. This challenge is anticipated for 2025 as well.

A significant contributing factor is the prioritization of federal funds, which are typically utilized first due to the risk of these funds being rescinded. As a result, NW Natural funds are reserved for furnace replacements and tune-ups, limiting their application to projects or measures with higher energy savings. Table 5 contains the revised numbers for 2025.

Table 5. WA-LIEE 2025 Program Goals

WA-LIEE	Adjusted 2025 Goal
Number of Homes Weatherized	2
Furnace Only	8
Therm Savings	1,000

Program Updates:

With input from our stakeholders, including Clark County and the EEAG, we successfully increased program funding available for whole home weatherization projects. Recognizing the critical need for additional health and safety funds to help homes meet the necessary standards for weatherization, we implemented a \$4,000 flexible spending increase per year, per project. This funding can be used to support essential health and safety measures and/or additional energy efficiency improvements.

As part of ongoing efforts to improve program outcomes, NW Natural conducted an Energy Burden Assessment (EBA) in 2024. This assessment identified approximately 10,000 high-burden, low-income customers within the SW Washington service territory and highlighted significant opportunities for high impact energy efficiency upgrades. Recognizing capacity constraints from our primary partners, Clark County, in addressing the needs of this territory, NW Natural will explore partnerships with additional agencies or contractors. A key challenge remains in identifying partners capable of delivering these services without exacerbating capacity constraints or creating long customer waitlists. NW Natural is looking to engage partners who can enhance outreach and service delivery while ensuring timely and effective support for these customers.

Additionally, NW Natural is conducting an impact and program evaluation of the WA-LIEE program. This evaluation is focused on identifying ways to improve program design, delivery, and customer outreach. The goal is to enhance the program's effectiveness and extend its reach to underserved customers. These initiatives, combined with the insights from the EBA, will equip NW Natural to target and serve customers in the SW Washington area.

Table 6. WA-LIEE 2025 Program Budget

WA-LIEE		Budget
	WA-LIEE Measures (Including H/S/R)	\$ 54,000
WA-LIEE	Furnace Only	20,000
	WA-LIEE Agency Administration (25%)	18,500
	WA-LIEE application processing admin (5% cap)	3,700
	2025 WA-LIEE Total	\$ 96,200

3.3 Gas Market Transformation

The Company will continue its participation with NEEA in 2025. 2025 will mark the first year in the new 5-year business plan cycle. Due to HB 1589 NEEA has shifted its focus to commercial and fuel neutral programs. This is not anticipated to impact the near-term savings forecast for the upcoming program year. NEEA will continue to monitor the development of residential high efficiency gas heating systems and may quantify savings in future years associated with previous intervention activities.

Table 7. NEEA Market Transformation Budget & Savings Goal

NEEA	2025 BEEP Goal	Updated 2025 Annual Plan Goal	Percent Change
Budget	\$ 241,204	\$ 241,204	0%
Savings (therms) *	40,000	40,000	0%

^{*}NEEA provides saving ranges for the funding cycles. The annual goal is an NW Natural estimate.

3.4 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.

3.4.1 Industrial Audits

The Industrial Audit Pilot wrapped up in 2024. The program provided high level energy audits to industrial facilities that are not currently eligible for energy efficiency programs and incentives through Energy Trust.

While only 6 sites took advantage of the pilot, there was an interest in having technical assistance and incentives to help industrial facilities implement energy efficiency projects. Looking forward into 2025, NW Natural plans to work with the EEAG to right size a program offering for industrial customers.

NW Natural has listed a budget associated with program start-up costs. Adjustments to Schedule 215 or a new schedule will need to be created before expenses are incurred. Estimated costs are dependent on receiving schedule approvals and do not include incentive estimates. Due to the lead time associated with establishing a new program, no savings are anticipated for this offering in 2025.

Table 8. Industrial Program 2025 Budget & Savings Goal

Industrial Program	2025 BEEP Goal	Updated 2025 Annual Plan Goal	Percent Change
Budget	\$ 150,000	\$ 150,000	0%
Savings (therms)	0	0	N/A

3.4.2 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. After a RFI and a competitive bidding process, NW Natural selected Bidgely to be the pilot implementer. The program launched ahead of schedule in October of 2023.

The program's reported savings during 2024 were well above what was originally estimated. There are no incentives associated with the program, so an increase in savings does not impact expenditures. While these initial reports are promising, these are not evaluated savings. 2025 estimated savings are updated to reflect the level of savings that was seen in the first program year but are likely over estimations for what we can claim in the Biennial Energy Efficiency Report.

Costs for the delivery of the program have increased from what was initially included in the 2024-2025 BEEP. The increase is due to an anticipated increase in the price of postage in 2025. Current postage rates are \$0.42 and expected to increase to \$0.60.

Behavioral Energy Efficiency Pilot	2025 BEEP Goal	Updated 2025 Annual Plan Goal	Percent Change
Budget	\$ 281,175	\$315,541	11%
Savings (therms)	112,684	266,327	58%

Table 9. BEE Pilot 2025 Budget & Savings Goal

3.4.3 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 outlined plan to promote this technology. While commercial units have been on the market the residential units are still not readily available for consumers. There is currently one residential product from Stone Mountain Technologies that has been tested and is shipping in North America. Additional products from Robur and Vicot are still in development and looking for funding NW Natural plans to monitor the market and may propose a pilot project to the EEAG in 2025 if there is sufficient product availability.

3.5 Regional Technical Forum

The Company has agreed to support the work of the Regional Technical Forum's 2025-2029 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. There was a minor adjustment in the budget as contracts were not finalized at the time of the 2024-2025 BEEP filing.

Regional Technical Forum	2025 BEEP Goal	Updated 2025 Annual Plan Goal
Budget	\$15,000	\$14,400

Table 10. RTF 2025 Budget

4 Reporting

4.1 Evaluation Activities

The Company or program implementor may contract and conduct both impact and process evaluations of program offerings. In addition to program evaluations, NW Natural conducts a third-party verification of reported savings for the Biennial Energy Efficiency Report.

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.

Planned impact evaluations scheduled to complete in 2025 include:

- Evaluation of BEE Program's First Year Savings
- 2023 Existing Buildings Impact Evaluation
- Residential Billing Analysis Smart Thermostats
- Residential Billing Analysis Gas Furnaces (Oregon only)
- Honeywell Smart Thermostat Pilot Evaluation
- Low-Income Program Impact Evaluation

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.

Planned process evaluations for 2025 include:

- Low-Income Program Process Evaluation

- 2023-2024 Existing Buildings Process Evaluation
- SEM Process Evaluation (C&I)
- 2024 Fast Feedback (Customer Satisfaction)
- 2023-2024 Residential Process Evaluation

4.2 Conservation Potential Assessment

In 2019, HB1257 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 2025 CPA, NW Natural is undergoing a competitive bid process to select a vendor. For the 2021 and 2023 CPAs, NW Natural utilized Applied Energy Group ("AEG") for those assessments. A suggestion from the EEAG recommended assessing other vendors to get a new perspective. NW Natural plans to select a vendor in December of 2024 and begin work in January 2025.

The CPA must be filed on or before June 1, 2025. A draft version of the results will be shared with the EEAG 30 days in advance of the filing. The Company notes that the timeline for the work is very condensed, and the full draft report may not be available on May 1st.

4.3 2024 Annual Report

NW Natural will file the 2024 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 2026-2027 Biennial Energy Efficiency Plan

NW Natural will file the 2026-2027 BEEP on or before November 15, 2025. 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.