



250 SW Taylor Street  
Portland, OR 97204

503-226-4211  
nwnatural.com

September 30, 2020

NWN WUTC Advice No. 20-11

**VIA ELECTRONIC FILING**

Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503

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Records Management  
09/30/20 16:14  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**Re: Schedule J—Gas Residential Energy Assistance Tariff (GREAT)**

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following revisions to its Tariff WN U-6, stated to become effective with service on and after November 1, 2020.

Second Revision of Sheet J.1	Schedule J	Gas Residential Energy Assistance Tariff (GREAT)
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**Purpose**

The purpose of this filing is to update language in the tariff sheet listed above that would allow for expanded access to NW Natural’s energy assistance program.

**Background**

Schedule J defines the framework for NW Natural’s energy assistance program known as the Gas Residential Energy Assistance Tariff (GREAT) Program. The GREAT Program provides bill payment assistance to qualifying residential customers. The program is administered through designated agencies that screen applicants for eligibility and approve bill payment assistance grants. The designated agencies currently administering the GREAT Program are Clark Public Utilities and Washington Gorge Action Programs. In compliance with Schedule J, these agencies follow the established protocols for the qualification of and disbursement to eligible participants in accordance with the guidelines established by the Washington Department of Commerce for disbursement of federal Low-Income Home Energy Assistance Program (LIHEAP) funds. Schedule J also notes that one exception to the agencies following the LIHEAP guidelines is that income-eligibility will be allowed up to 150% of federal poverty guidelines.

**Proposed Changes**

NW Natural proposes to modify Schedule J to allow income eligibility up to 200% of federal poverty guidelines. Increasing the federal poverty guideline threshold will serve to cast a wider net for GREAT energy assistance such that more residential customers would qualify to receive energy assistance grants. NW Natural has discussed this change with the GREAT Advisory Group during the 2020 Advisory Group meetings.<sup>1</sup> The Advisory Group members support this change.

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<sup>1</sup> NW Natural’s GREAT Advisory Group was established in its last general rate case in docket UG-181053. The Advisory Group has met regularly since its formation in August 2019 and includes members from Commission Staff, The Energy Project, Public Counsel, the agency representatives and Washington Department of Commerce.

**Conclusion**

NW Natural respectfully requests that the Commission approve this tariff change with an effective date of November 1, 2020.

In accordance with WAC 480-90-193 and WAC 480-90-195(3), copies of this letter and the attached filing are available in the Company's main office in Portland, Oregon, and on its website at [www.nwnatural.com](http://www.nwnatural.com).

As requested by WAC 480-80-103(4)(a), I certify that I have authority to issue tariff revisions on behalf of NW Natural.

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

eFiling  
NW Natural Rates & Regulatory Affairs  
250 SW Taylor Street  
Portland, Oregon 97204  
Fax: (503) 220-2579  
Telephone: (503) 610-7330  
[eFiling@nwnatural.com](mailto:eFiling@nwnatural.com)

Respectfully submitted,

*/s/ Natasha Siores*

Natasha Siores  
Manager, Regulatory Compliance  
NW Natural  
250 SW Taylor Street  
Portland, Oregon 97204  
503-610-7074  
[natasha.siores@nwnatural.com](mailto:natasha.siores@nwnatural.com)

Attachment:  
NEW-NWN-WUTC-Advice-20-11-Trf-Sheet-J-1-09-30-2020