

December 20, 2024

NWN WUTC Advice No. 24-18

VIA ELECTRONIC FILING

Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Re: NEW Schedules – Residential Arrearage Management Program

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), herewith files the following revisions to its Tariff WN U-6, stated to become effective April 1, 2025.

Twenty-First Revision of Sheet vii	Index	Tariff Index (continued)
Fifteenth Revision of Sheet viii	Index	Tariff Index (continued)
Original Sheet N.1	Schedule N	Residential Arrearage Management Program
Original Sheet N.2	Schedule N	Residential Arrearage Management Program (continued)
Original Sheet 234.1	Schedule 234	Temporary Adjustments to Rates for Residential Arrearage Management Program
Original Sheet 234.2	Schedule 234	Temporary Adjustments to Rates for Residential Arrearage Management Program (continued)

Purpose

The purpose of this filing is to request Washington Utilities and Transportation Commission (Commission) approval of a new tariff Schedule N for an arrearage management program (AMP) for income-qualified residential customers and a related new tariff adjustment Schedule 234 for the recovery of costs for the program.

This proposed program is in compliance with Order 01 in docket UG-230739 and in alignment with RCW 80.28.068 and is a new incremental program that will complement NW Natural's existing low-income programs, which include the bill discount program, the Gas Residential Energy Assistance Tariff (GREAT), the Gas Assistance Program (GAP), the Washington Low-Income Energy Efficiency (WALIEE) program, and federal Low-Income Home Energy Assistance Program (LIHEAP) funding.

Background

The Commission directed NW Natural to work with its GREAT Advisory Group (Advisory Group) to develop an AMP and file tariff revisions before the end of 2024 as part of the Commission's

approval of the Company’s bill discount program in Order 01 in docket UG-230739.¹ NW Natural has worked collaboratively with the Advisory Group throughout 2024 to develop and discuss the AMP that is included in this filing. NW Natural appreciates the time and input from the Advisory Group throughout the 20 meetings convened in 2024 to discuss and finalize the AMP. NW Natural shared drafts of the AMP tariff before discussions at the November 15 and December 13 Advisory Group meetings.

Proposed Program

NW Natural proposes an AMP that provides arrearage assistance to income-eligible customers based on customers’ household incomes, with the potential for higher arrearage forgiveness for lower income households. Customers can enroll in the AMP by calling NW Natural’s Customer Contact Center. Enrollment assistance from local community action agencies may become available, pending technology capabilities.

Program Design and Enrollment

The AMP is a grant-based program, with arrearage forgiveness through Instant Grants and arrearage assistance through Matching Grants with Time-Payment Arrangements (TPAs). Crisis Instant Grants will also be made available as a grant option for customers expressing no means to make payment and suffering financial hardship, with no income eligibility required; these grants are only provided with Customer Contact Center Supervisor approval. The table below summarizes the principal AMP design.

Income Threshold	AMP Assistance
0-60% FPL	100% Instant Grant
61-120% FPL	100% Instant Grant
121-150% FPL	75% Instant Grant or Matching Grant with TPA
greater of 151-200%FPL or 80% AMI	Matching Grant with TPA

The grant and program limits were developed in consultation with the Advisory Group and specify:

- Program maximum assistance of \$1,500 every 24 months
- Grant limits:
 - \$1,500 Instant Grant Limit
 - \$1,000 Matching Grant with TPA Limit
 - \$500 Crisis Grant Limit

For customers enrolling in the AMP at the 121-150% FPL income threshold, customer service representatives will discuss the options available and work with customers to choose the option the customer is most comfortable with. From NW Natural’s previous experience with AMPs, we understand that providing a choice in AMP grants is important for the customer experience and have included that optionality in the design of this proposed AMP.

In addition, based on input from the Advisory Group, an Instant Grant after TPA renegotiation is available for those customers with income greater than 150%. This would provide up to a 75% Instant Grant for customers unable to complete a Matching Grant with TPA after the TPA has been renegotiated once. Participants in the Matching Grant with TPA will not be removed from the AMP

¹ In addition, NW Natural has filed monthly updates on progress in developing the AMP as required by the Commission in Order 01 in docket UG-230739.

if payments are missed; NW Natural customer service representatives will work with these customers to adjust the TPA or provide the 75% Instant Grant option. NW Natural's customer service representatives will also continue the existing practice of discussing the availability of other programs and energy assistance that are available for customers, as well as referring to community action agencies.

Participation in the AMP is intended to be complimentary of NW Natural's energy assistance programs such as the bill discount program, GREAT, GAP and WALIEE and federal programs such as LIHEAP; thus, participation in the AMP will not prohibit customers from qualifying for, or participating in, additional assistance programs.

NW Natural expects the AMP to be available for customers by April 1, 2025.

Advisory Group discussion

NW Natural and the Advisory Group are continuing to discuss some issues related to the AMP, including goals for the AMP and the potential for Agencies to assist with enrollment. Goals are anticipated to be determined based on current levels of arrears and the number of customers in arrears, the data for which is still being gathered by the Company. NW Natural anticipates finalizing goals for the AMP by the launch of the AMP on April 1, 2025. The potential for Agencies to assist with enrollment is dependent on developing short and long-term solutions for data sharing that would enable Agencies to gauge a client's past due balance and previous participation in the AMP. These solutions are evolving and NW Natural will continue to work with Agencies and the Advisory Group to find a solution that will work efficiently and effectively for all. Finally, data on the AMP's performance will be discussed by NW Natural and the Advisory Group as the AMP is in flight. NW Natural will include AMP metrics in the GREAT Annual Report and collaborate with the Advisory Group regarding the expected metrics by September 30, 2025 – this timing will allow for several months of data on the AMP to be available and also allow for incorporation into the GREAT Annual Report draft that is shared on/around every December 1.

Outreach and engagement

Since 2021 NW Natural has emphasized a focus on collaborating extensively with a diverse array of community partners across its service territory, including community action agencies, community-based organizations (CBOs), housing networks, places of worship, food banks, culturally specific organizations, and healthcare networks. These strategic partnerships have been invaluable, enabling us to connect with customers we might not otherwise reach and to disseminate information about our bill discount program through trusted and respected channels. We continue to engage with partners throughout the Company's three counties in Washington. NW Natural will leverage this outreach and engagement for the AMP.

This community outreach will augment NW Natural's traditional customer communications through its bill inserts, website, social media and other platforms to broadcast the availability of the AMP. We will also coordinate with our Agencies to ensure there are materials and resources about the new program for our community action agency partners and their clients.

Cost Recovery

NW Natural proposes new tariff Schedule 234 to recover the costs of the AMP, which includes the cost of the AMP grants and incremental costs NW Natural may experience for program costs such as, but not limited to administrative, outreach, and communication costs. The Company proposes to use deferred accounting to track program costs. NW Natural anticipates seeking cost recovery of the deferred program costs each year as part of the Company's Purchased Gas Adjustment filings, or at other times as approved by the Commission. NW Natural has filed a separate Accounting

Petition for the use of deferred account for the AMP, which has been docketed as UG-240920.² As such, there is no rate impact of this filing.

Conclusion

NW Natural respectfully requests an effective date of April 1, 2025. There is no rate impact of this filing.

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.

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

For the purposes of establishing a service list for this docket, and for any questions, please address correspondence on this matter to me with copies to the following:

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Respectfully submitted,

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Attachment:
NEW-NWN-WUTC-Advice-24-18-Trf-Sheets-12-20-24

² *In the Matter of Northwest Natural Gas Company dba NW Natural for an Accounting Order Authorizing Deferred Accounting Treatment of the Residential Arrearage Management Program*, Docket No. UG-240920 (Nov. 22, 2024).