

May 20, 2022

NWN WUTC Advice No. 22-03

**VIA ELECTRONIC FILING**

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

**Re: Schedule K – COVID-19 Assistance Program (CAP)**

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 July 1, 2022.

First Revision of Sheet K.1	Schedule K	COVID-19 Assistance Program (CAP)
-----------------------------	------------	-----------------------------------

**Purpose**

The purpose of this tariff revision is to add language to the existing Schedule K COVID-19 Assistance Program (CAP) to enable NW Natural to expand its current auto-enrollment of income-qualifying customers.

**Background**

On March 22, 2021, NW Natural made a tariff filing to introduce the CAP, reflecting the term sheet agreement in U-200281, to establish a temporary COVID-19 assistance program to income-eligible customers. On April 6, 2021, the Company filed revised tariff sheets to reflect changes and input from Commission Staff regarding the program. The tariff proposal was presented at the Commission's April 22, 2021 open meeting and was allowed to become effective April 23, 2021, by operation of law.

Currently the CAP allows for auto-enrollment of past-due customers who have received energy assistance since January 1, 2019. NW Natural proposes to expand auto-enrollment to include customers who earn up to 200% of Federal Poverty Level (FPL) income.

As required by Order 03 in docket U-200281, NW Natural provides monthly reports of CAP activity in docket U-200281.

**Proposed Changes**

NW Natural proposes tariff language that will allow for additional auto-enrollment of past-due customers. Currently past-due customers who have received energy assistance instance since January 1, 2019 are eligible for auto-enrollment. By adding language stating that the Company may identify additional auto-enrollments for past-due customers earning up to 200% FPL based on availability of customer data, customer need and availability of funds, we hope to reach additional customers needing assistance that may not have availed themselves of energy assistance. Using data from a third-party, NW Natural proposes to identify past-due customers who earn up to 200% FPL for auto-enrollment for CAP grants. NW Natural has acquired Total Source Plus data from a

Received  
Records Management  
05/20/22 15:55  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

third-party, Epsilon, which derives the data from multiple sources including census data. The Total Source Plus data set includes household size and income data. Analyzing this data and cross-referencing it with our customer data, we have identified approximately 400 customers in arrears who earn up to 200% FPL that qualify for grants totaling about \$100,000. NW Natural's proposal to add an auto-enrollment using this data will enable these grants to be applied.

NW Natural will also review each grant application individually to confirm the accuracy of the account holder and premise referenced against the income data before the grants are applied to the accounts. In addition, these customers will receive a letter informing them of the CAP funds being applied to their account, providing references for available energy assistance and asking customers to contact NW Natural with any questions.

The CAP was established with funding up to one percent of the Company's revenues, or \$652,000. Through May 9, 2022, NW Natural has provided or committed \$95,379 in CAP grants, resulting in \$556,621 or 85% of remaining available CAP funds.

**CAP Grant Activity as of May 9, 2022**

<b>Program to Date</b>	<b>Automatic Grants</b>	<b>New Applications</b>	<b>Total</b>
CAP Grants	138	137	275
Average CAP Grant	\$395.69	\$277.64	\$336.88
CAP Funds Expended through April 2022	\$54,604.66	\$38,036.25	\$92,640.91
CAP Funds Committed as of May 9, 2022			\$2,738.28
Subtotal CAP Funds Expended and Committed			\$95,379.19
CAP Funds Authorized			\$652,000.00
CAP Funds Remaining			\$556,620.81
Percent Remaining			85.4%

NW Natural proposes the expansion of CAP auto-enrollment to extend the reach of assistance to customers in need. The idea for this expansion was raised in a GREAT Advisory Group meeting in 2021 and the Company was recently able to acquire the necessary data and perform the needed analysis to bring about this proposal. We shared the enclosed tariff program proposal with our GREAT Advisory Group before this filing and met with Commission Staff, Public Counsel and The Energy Project, who expressed their support of NW Natural making this filing.

NW Natural will continue the current practice of periodically auto-enrolling customers for CAP grants for those past-due customers who have received energy assistance since January 1, 2019, consistent with the existing tariff language.

**Conclusion**

NW Natural respectfully requests that the Commission allow this tariff change to become effective on July 1, 2022.

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-22-03-Trf-Sheet-K-1-05-20-2022