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Feb 2, 2024

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NWN WUTC Advice No. 24-01

VIA ELECTRONIC FILING

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

Re: Schedule I – Washington Low-Income Energy Efficiency (WA-LIEE) Programs

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 March 15, 2024.

Sixth Revision of Sheet I.1	Schedule I	Washington Low-Income Energy Efficiency (WA-LIEE) Programs
Fifth Revision of Sheet I.2	Schedule I	Washington Low-Income Energy Efficiency (WA-LIEE) Programs

Purpose

The purpose of this filing is to request revisions to the Company’s Washington Low-Income Energy Efficiency (WA-LIEE) program described in Schedule I to: 1) increase the amount of benefit to low-income households taking service from Schedule I by increasing available WA-LIEE funding per dwelling; 2) add a provision to allow for program impact evaluations; and 3) make a housekeeping correction for a typographical error.

Background

Schedule I describes the Company’s WA-LIEE Program that provides energy efficiency benefits to income-qualifying residential dwellings. The tariff currently in effect allows \$5,000 for energy efficiency (EE) measures and an average of \$1,000 per household per community action agency for Health, Safety, and Repairs (HSR) reimbursement. NW Natural is proposing to increase the funding for EE measures by \$10,000 and the funding for HSR reimbursement by \$3,000, for a total increase per household of \$13,000 to provide more EE and HSR measures to income-eligible households.

NW Natural presented these proposed tariff changes to its Energy Efficiency Advisory Group (EEAG) on March 22, 2023, and August 16, 2023. In compliance with docket UG-210831 Order 01, Attachment A Condition 6c, NW Natural also shared a copy of this filing on October 3, 2023.

Proposed Changes

Schedule I, Sheet I.2:

1. NW Natural is proposing to increase the amount of the maximum rebate per household from \$5,000 to \$15,000. The average rebate per home has increased to over \$5,000 in recent years and the Company is aware of outlier situations where the current cap would not be enough to complete weatherization for the home. The Company is proposing these changes in the interest of providing more funds to more income-eligible households.

In addition, NW Natural proposes to remove existing language regarding HSR disbursement limits and to add the following language to Schedule I on Sheet I.2: "Additional flexible spending of \$4,000 will be available per project to supplement EE measures and HSR reimbursements." Currently Schedule I allows for a maximum annual HSR disbursement available to each community action agency of \$1,000 times the actual number of households treated in the Program Year. The Company is seeking to increase the amount of funding due to feedback from NW Natural's partner local community action agency, Clark County Community Action Agency, that expressed the funding was not enough to cover multiple HSR or EE measures and therefore customers would have to choose some measures over others. This additional funding will allow Washington customers to complete multiple energy efficiency measures at one dwelling.

Schedule I, Sheet I.1:

2. NW Natural proposes to add language to Schedule I, Sheet I.1 that would allow for a third-party process and/or impact evaluation for a WA-LIEE program evaluation to learn about opportunities to improve the program through outreach, education, or other methods. The Company will work in consultation with the EEAG on any process/impact evaluation, and the cost of the evaluation will be funded with WA-LIEE funds.
3. The Company is correcting a typographical error on Sheet I.1 in the Purpose section changing "low-come" to "low-income."

This filing has no immediate rate impact. Costs for the WA-LIEE program are deferred and recovered through customer rates in Schedule 230, which is updated annually with the Company's annual Purchased Gas Adjustment filing.

As mentioned above, these proposed tariff changes have been collaboratively discussed and reviewed with NW Natural's EEAG.

Conclusion

NW Natural respectfully requests that the Commission approve the proposed revisions of the enclosed tariff sheets to become effective with service on and after March 15, 2024.

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

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.

For purposes of establishing a service list and for any questions, please address correspondence on this matter to Rebecca Trujillo at rebecca.trujillo@nwnatural.com with copies to the following:

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Sincerely,

NW NATURAL

/s/ Rebecca Trujillo

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Attachment:
NEW-NWN-WUTC-Advice-24-01-WALIEE-Trf-Sheets-02-02-24