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August 20, 2024

NWN WUTC Advice No. 24-06

VIA ELECTRONIC FILING

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

Re: Schedule J – Gas Residential Energy Assistance Tariff (GREAT) and Schedule L – Residential Bill Discount Program – Optional for Qualifying Customers

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 October 1, 2024.

Fourth Revision of Sheet J.1	Schedule J	Gas Residential Energy Assistance Tariff (GREAT)
First Revision of Sheet L.1	Schedule L	Residential Bill Discount Program
First Revision of Sheet L.2	Schedule L	Residential Bill Discount Program

Purpose

The purpose of this tariff filing is three-fold:

- (1) Revise the customer income eligibility criteria for the Gas Residential Energy Assistance Tariff (GREAT) program in Schedule J.
- (2) Clarify the order in which assistance is applied between the Residential Bill Discount Program and the federal Low Income Home Energy Assistance Program (LIHEAP).
- (3) Revise the bill discount program re-enrollment period for fixed income customers. These customers will have their program eligibility extended from two years to four.

Background

On November 22, 2023 NW Natural filed its Advice No. 23-05C to finalize the details of its proposed Schedule L – Residential Bill Discount Program, which included discussion about additional proposed changes to the GREAT and Residential Bill Discount Programs to be made in 2024.¹ NW Natural has worked collaboratively with the GREAT Advisory Group to address these changes over the past several months, which is the subject of this filing.

Proposed Changes

GREAT – Schedule J

- (1) NW Natural proposes changing the qualifying income criteria for the GREAT program to the greater of 80% of AMI or 200% of the FPL, adjusted for household size. Currently, a customer is eligible for the GREAT program if their gross household income is at or below 200% of the Federal Poverty Level (FPL). This change reflects the low-income definition set for Washington electric utilities in RCW 19.405, providing consistency for customers and is expected to help relieve the energy burden for more NW Natural customers. This change will also align the GREAT program's eligibility level with the Company's Bill Discount Program's threshold income eligibility criteria.

¹ NW Natural's Bill Discount Program was approved in docket UG-230739, see Order 01.

Residential Bill Discount Program – Schedule L

- (2) NW Natural is proposing that LIHEAP funds be applied to a customer's account before assistance is offered through the Residential Bill Discount Program. This change is responsive to feedback from our GREAT Advisory Group to implement LIHEAP prioritization such that LIHEAP funds are considered before bill discounts are applied. To implement this, NW Natural's process will be that when LIHEAP is applied to an account and creates a credit balance of more than \$10, the customer's discount from the Residential Bill Discount Program will be paused. After LIHEAP is exhausted, a customer's bill discount will resume.
- (3) Lastly, the Company is proposing that fixed income customers (such as, but not limited to seniors and disabled customers) have their program eligibility extended from two years to four. This will add to the convenience of participating in the Residential Bill Discount Program for many of NW Natural's customers.

These changes have been developed with the input of NW Natural's GREAT Advisory Group and this tariff filing has been shared and reviewed with the group before filing.

Conclusion

NW Natural respectfully requests that the Commission allow these tariff changes to become effective on October 1, 2024.

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.

Please address correspondence on this matter to Amy Schulties at (503) 610-7546 or amy.schulties@nwnatural.com, with a copy to the following:

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Respectfully submitted,

/s/ Natasha Siores

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Attachments:

NEW-NWN-WUTC-Advice-24-06-Trf-Sheet-J-1-08-20-2024

NEW-NWN-WUTC-Advice-24-06-Trf-Sheet-L-1-08-20-2024

NEW-NWN-WUTC-Advice-24-06-Trf-Sheet-L-2-08-20-2024