

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, d/b/a NW NATURAL,

2022 Conservation Potential Assessment
and Conservation Plan

DOCKET UG-190711

NW NATURAL GAS COMPANY

PETITION TO AMEND ORDER
NO. 02

I. INTRODUCTION

I Pursuant to WAC 480-07-875, Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), respectfully petitions the Washington Utilities and Transportation Commission (Commission) to amend Order 02 in the above-captioned docket. Order 02 granted the Company’s petition for a temporary exemption from WAC 480-90-238(4), thereby extending the filing deadline of its Integrated Resource Plan (IRP) to July 29, 2022. As part of this order, the Commission also established a filing schedule that required NW Natural to file its Conservation Planning Assessment (CPA) by June 1, 2021. Based on changed conditions since the Commission entered Order 02,¹ NW Natural respectfully requests that the Commission issue an amended order that: 1) changes the CPA filing date to July 30, 2021; and 2) since the CPA informs the Conservation Plan, changes the Conservation Plan filing date to November 1, 2021.

¹ See WAC 480-07-875 (“Any such petition must comply with the requirements in WAC 480-07-870 for a petition for rehearing.”); and WAC 480-07-870 (“A petition for rehearing must set forth sufficient grounds . . . Sufficient grounds for rehearing consist of . . . [c]hanged conditions since the commission entered the order.”).

II. BACKGROUND

2 NW Natural is a natural gas utility and public service company doing business in the State of Washington and is subject to the jurisdiction of the Commission regarding rates and terms of natural gas service in Washington. The Company's principal place of business is 250 SW Taylor Street, Portland, Oregon 97204. Communications regarding this petition should be addressed to:

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III. DISCUSSION

A. Procedural History

3 On September 22, 2020, NW Natural filed a petition with the Commission requesting temporary exemption from WAC 480-90-238(4), Integrated Resource Planning Timing. After discussing more specific due dates with Commission Staff, NW Natural amended its petition on October 13, 2020, which, among other things, proposed that NW Natural would file its CPA on June 1, 2021. On November 13, 2020, the Commission issued Order 02,

granting an exemption from WAC 480-90-238(4) subject to certain conditions, including filing a final CPA no later than June 1, 2021.

B. Changed Conditions Since the Commission Issued Order 02

- 4 NW Natural is filing its CPA pursuant to section 11 of HB 1257 from the 2019 Legislative Session. Section 11 requires “a conservation potential assessment prepared by an independent third party and approved by the commission.”² Shortly after Order 02 was issued, NW Natural issued a request for proposal seeking an independent third party to perform its CPA. NW Natural received four responses. NW Natural decided to select a company that has previous experience in Washington, and is already working with other gas utilities in Washington on their CPAs. Commission Staff is familiar with the modeling used by this company, and informed NW Natural that this will make Staff’s review process more efficient.
- 5 While the company is familiar to Staff, it cannot provide NW Natural’s final CPA until July 30, 2021 due to its pre-existing workload and the estimated start-up time required to begin a new CPA for NW Natural. Nonetheless, NW Natural believes it is best to work with a company that is familiar to Staff, even if that means a delay in filing its CPA. If NW Natural chose a company with no Washington experience, Staff would have to review models that they are unfamiliar with and they may lack access to some proprietary material.
- 6 In addition, since the CPA informs the Conservation Plan, the Company is also requesting to change the filing date of the Conservation Plan from the date established in Order 02 (October 1, 2021) to November 1, 2021. Given that the CPA is necessary to develop the

² No administrative rules have yet been adopted to implement this provision, including timing of these filings.

Conservation Plan and the CPA will be delayed by two months, the Company needs additional time to develop its Conservation Plan in coordination with the Energy Trust of Oregon, which administers NW Natural's energy efficiency program in Washington.

7 NW Natural has shared and discussed these dates for the CPA and Conservation Plan with Commission Staff. In addition, the Company previewed these dates at its IRP Technical Working Group held on February 2, 2021. The Company did not receive any objections to these dates.

8 Because of these reasons, NW Natural believes that there is good and sufficient cause to work with a company that is familiar to Staff and file its CPA no later than July 30, 2021 and the Conservation Plan no later than November 1, 2021.

C. All Other Dates Remain Unchanged

9 In compliance with Order 02, NW Natural will file an updated IRP work plan no later than February 11, 2021, a draft IRP no later than June 30, 2022, and a final IRP no later than July 29, 2022.

IV. CONCLUSION

10 NW Natural respectfully requests that the Commission issue an amended order allowing it to file its CPA by July 30, 2021 and its Conservation Plan by November 1, 2021. For the reasons provided above, an amendment is necessary due to changed conditions since the order was issued.

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Respectfully submitted this 11th day of February, 2021.

NW NATURAL

/s/ Ryan Sigurdson

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