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October 7, 2025

NWN WUTC Advice No. 25-08A / UG-250717

#### VIA ELECTRONIC FILING

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

Re: UG-250717 - Annual Purchased Gas Cost, Deferred Gas Cost Amortization
Adjustments and Combined Effects – Replacement Pages – DO NOT REDOCKET

Dear Mr. Killip:

On September 15, 2025, Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), filed a tariff revision in the above-mentioned docket with an effective date of November 1, 2025, seeking to revise several tariff sheets, including the annual purchased gas cost and deferred gas cost amortization adjustments.

The purpose of this filing is to update the usage-per-customer in the Company's original filing so that it aligns with NW Natural's most recently completed General Rate Case, UG-200994, Exhibit A, and Exhibit B. Exhibit C and the hedging plan remain unchanged from the Company's original September 15<sup>th</sup> filing. In addition, tariff sheets 201.1, 201.2, 203.1, 142.12, and 143.6 also remain unchanged from the September 15<sup>th</sup> filing.

# **Proposed Changes**

1. Effect of Rate Changes Proposed

If there were no other adjustments to rates effective November 1, 2025, the effect of the rate changes proposed in this PGA filing is a decrease to the average monthly bills in the primary rate schedules as follows: Schedule 2 Residential bills will decrease by 5.9%¹ and Schedule 3 commercial bills will decrease 6.4%. If the effects of the temporary rate adjustments were permanent, the combined result of the rate changes would be a decrease in the Company's revenues from its Washington operations of \$6,759,745 or 6.15%.

### 2. Combined Effects

<sup>&</sup>lt;sup>1</sup> All bill impacts assume Climate Commitment Act charges and credits for non-low income customers who joined NW Natural's system before July 25, 2021, as set out in Schedule 308 - Washington Climate Commitment Act Recovery Mechanism.

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The combined effect of the rate changes proposed to become effective November 1, 2025, is a decrease to the average monthly bills in the primary rate schedules as follows: Residential Schedule 2 bills will decrease by 5.7% and commercial Schedule 3 bills will decrease 6.3%. The combined result of all components of the rate changes would be a decrease in the Company's revenues from its Washington operations of \$6,723,454, or 6.12%.

## **NW Natural's Pending General Rate Case**

On August 29, 2025, Northwest Natural Gas Company filed a general rate case with revised tariff sheets in Docket UG-250610 proposing new rates. In Order 01 of that docket, the Commission suspended those tariff sheets pending the general rate case process. However, the suspended tariff sheets include not only the base rates, but all components of a customer's total billing rate, including rates that are updated in this Purchase Gas Adjustment (PGA) docket and coincident filings. NW Natural must update these tariff sheets in order to accurately collect the cost-of-service from its customers. As stated above, the combined effects of the rate changes proposed to become effective November 1, 2025 is a decrease to average monthly bills.

Therefore, NW Natural respectfully requests that the Commission permit NW Natural to revise its tariff sheets during the suspension period as described in the Company's filings in this docket. This request is consistent with Order 01 of Docket UG-250610, which states that the Commission may authorize such changes during the suspension period.<sup>2</sup>

Please address correspondence on this matter Michael Lewis at michael.lewis@nwnatural.com with copies to the following:

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Sincerely,

**NW NATURAL** 

/s/ Kyle Walker, CPA

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<sup>&</sup>lt;sup>2</sup> Specifically, Order 01 states: "Northwest Natural Gas Company must not change or alter the tariffs filed in this docket during the suspension period unless authorized by the Commission."

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### Attachments:

250717-NWN-WUTC-Advice-25-08A-PGA-Exh-A-R-Pg-3-10-07-25 250717-NWN-WUTC-Advice-25-08A-PGA-Exh-A-R-10-07-25.xlsx 250717-NWN-WUTC-Advice-25-08A-PGA-Exh-B-R-Pg-1-10-07-25 250717-NWN-WUTC-Advice-25-08A-PGA-Exh-B-R-10-07-25.xlsx