

**Draft Work Plan for NW Natural's
WASHINGTON
UG-230801 - 2025 Integrated Resource Plan
May 1, 2024**

Introduction

NW Natural filed a petition for extension of the IRP in Docket UG-230783. The Washington Utilities and Transportation Commission (WUTC) granted NW Natural's petition for exemption from WAC 480-90-238(4), subject to the conditions that:

1. The company meet with its equity advisory group in late February to discuss its work plan related to equity and engagement.
2. The company also work with staff on the technical recommendations on the 2022 IRP between now and the time it files its work plan on May 01, 2024.¹

NW Natural met with its Community Equity Advisory Group (CEAG) on February 22, 2024, to discuss procedural justice in relation to NW Natural's Integrated Resource Plan (IRP) process and to review and receive feedback on proposed engagement activities for the 2025 IRP public process. Details on this meeting and feedback are included in Attachment A.

At the direction of WUTC Staff, NW Natural held two informal workshops with WUTC Staff and stakeholders that were involved in the 2022 IRP process to review Staff's recommendations from the 2022 IRP. These meetings lasted two hours and were held on April 18, 2024, and April 25, 2024. Both were recorded and posted on NW Natural's website.

The rest of this document serves as the work plan for NW Natural's 2025 IRP filed in UG 230801 on May 1, 2024, to be in compliance with WAC 480-90-238(4) and WAC 480-90-238(5). All dates are tentative and may be subject to change as needed throughout the process. Natural will keep stakeholders apprised of any changes to the work plan.

Methodology

The IRP is a regulatory requirement communicating long-term planning and forecasting of system needs. The IRP is the result of a rigorous analytical process inclusive of input from the public and stakeholders that follows three broad steps:

- 1) forecasting customers' future energy requirements and compliance requirements;
- 2) determining the options (both existing and potential) available to meet those requirements, inclusive of resource options that help reduce natural gas usage, shift

¹ *In the Matter of the Petition of Northwest Natural Gas Company, d/b/a NW Natural Seeking Extension for 2024 Integrated Resource Plan, docket UG-230783, Order 01, (Dec. 22, 2023).*

natural gas usage away from high demand periods, and options that help deliver natural gas to customers to meet their energy needs; and

- 3) identifying the portfolio of resources with the best combination of cost and risk for customers.

The culmination of the IRP process is a strategic roadmap for managing energy resources to meet current and future energy needs while maintaining reliability, safety, and affordability.

The purpose of the Integrated Resource Plan (IRP) is to develop strategies for purchasing gas, improve gas usage efficiency, and address carbon compliance requirements to meet current and future needs, typically 20 years or more, consistent with a lowest reasonable cost approach. Then based on these strategies develop a near-term action plan for commission staff, stakeholder, and ultimately commissioner review and recommendations. Future resources planning decisions (i.e., beyond roughly 4 years) maybe identified during the IRP process, but not included in the action plan if that decision can be re-evaluated with more recent information during the next IRP process.

To construct the IRP, NW Natural will develop demand forecasts, weather patterns (inclusive of impacts from climate change), natural gas price forecasts, carbon allowance forecasts, and cost and technical potential forecasts for all potential demand side and supply side resources. These forecasts, cost estimates, and technical potential estimates are inputs to the NW Natural’s resources planning optimization model, a software algorithm that identifies the combination of resources needed to meet all given requirements at the least cost. Risks are identified and analyzed through scenarios and looking at the potential ranges of the critical inputs (known as stochastic analysis). Scenario and stochastic analysis aim to identify various risks for different types of potential investments.

Improvements to the 2025 IRP Process

The Company sought and was approved for an extension request in part to better integrate equity considerations into its IRP planning process, including improving accessibility, exploring equity metrics, and incorporating equity analyses into the IRP. To wit, the intention of these improvements is to give greater consideration of equity throughout the IRP process. The 2025 IRP is the first step in this process—which we recognize (and celebrate!) will be thoughtful, ongoing, and iterative. In February 2024, the Company convened its CEAG as a starting point to fulfill this goal and gather feedback on amplifying the public participation and equity considerations in future IRPs. This work plan reflects the incremental enhancements to the 2025 IRP process recommended by the CEAG.

Equity Considerations

While specific guidelines regarding the integration of equity considerations in natural gas IRPs are still evolving, the Company recognizes that equity in the utility sector refers to the goal of ensuring that all stakeholders—whether they are customers, shareholders, or communities—have equal access to the advantages provided by natural gas infrastructure, while also remediating social, economic, and health burdens on those historically harmed by the energy system. The Company also recognizes that the ability to define guiding principles and adopt a range of quantitative metrics and qualitative best practices is essential for reversing existing inequities, ensuring accountability, measuring progress, and ultimately advancing equity in the energy sector.

As an early step to advancing energy equity at NW Natural—and a step overwhelmingly endorsed by members of our CEAG—we are establishing a shared understanding of equity language, concepts, and its various dimensions. This approach positions audiences to engage more meaningfully in the IRP process, as well as ensures transparency and consistent application by decision-makers. It also lays the foundation for developing equity targets and best practices. We are mindful that language should remain flexible and contextual and that multiple definitions can exist without invalidating each other. NW Natural also recognizes the ongoing, iterative process this important work entails. NW Natural refers to the Department of Energy and other resources to define its energy justice terms and concepts.¹ The Company emphasizes that this is not an exhaustive list of definitions, nor does it reflect the only definition for a particular term. These terms and definitions include:

- **Energy Burden:** Refers to the expense of energy expenditures relative to overall household income.
- **Energy Equity:** Refers to the goal of achieving equity in both the social and economic participation in the energy system, while also remediating social, economic, and health burdens on those historically harmed by the energy system.
- **Energy Justice:** While energy equity and energy justice are closely related concepts, they have distinct focuses and implications. Energy justice explicitly centers the concerns of marginalized communities and aims to make energy more accessible, affordable, clean, reliable, resilient, and democratically managed by and for all communities. Energy justice is often approached through the four tenets of procedural, distributive, restorative and recognition justice. Table 1 offers definitions and key considerations for each of these tenets.

Table 1 – Definition and Key Considerations

Pillars of Energy Equity and Justice		
Procedural	Creates inclusive, accessible, authentic engagement and representation in the development of energy planning and decision-making	Asks: Who is at the decision-making table? Is there diverse representation of impacted communities?
Recognition	Emphasizes the need to understand different types of vulnerability and specific needs associated with energy services among social groups (especially marginalized groups); as well as necessitates an understanding of historic and ongoing inequalities	Asks: Who is vulnerable, who is privileged, and how?
Distributional	Ensures equitable distribution of benefits and burdens	Asks: What benefits and burdens are distributed and among whom are they distributed?
Restorative	Aims to repair past harms and create positive change; prevents future harms from occurring and holistically considers whether each of the other three dimensions have been sufficiently addressed.	Asks: How can we rectify past injustices caused by the energy system and prevent future harm?

Enhancements to public participation in the IRP process play an important role in advancing equity principles. With these concepts and definitions in mind, updates to the 2025 IRP center on strengthening inclusive and meaningful engagement in the development of the IRP—core elements of procedural justice and equity. NW Natural emphasizes that the equity chapter in the IRP should not be considered the Company’s primary effort to further energy equity work. We reiterate that the intention of these enhancements is to give greater consideration of equity throughout the IRP process.

Steps to strengthen public participation and equity considerations in the IRP were heavily informed by direct feedback from the Company’s CEAG.² A high-level snapshot of priority actions include:

- Drafting a catalogue of equity-centered definitions and concepts
- Defining short- and long-term equity goals; establishing milestones and benchmarks to demonstrate accountability and progress
- Enhancing outreach, accessibility, and public participation opportunities

² Direct feedback was provided over the course of several meetings on various topics related to Company operations and processes including the meeting held on February 22, 2024, specific to the topic of Energy Justice and the IRP.

- Creating an IRP toolkit to improve awareness and engagement among non-technical audiences.
- Modifying content on NW Natural web pages to be more accessible
- Optimizing existing data and sourcing new data
 - Mapping Exercises³
 - Conducting a second Energy Burden Analysis (EBA)
- Partnering with trusted community organizations to host events that present IRP content in more accessible, less technical language

Table 2 below is a snapshot of other equity-centered initiatives already underway at the Company.

Table 2: Snapshot of NW Natural Equity Centered Operations & Programs

Current Program/ Activity <i>*income-qualified program</i>	Energy equity intervention
Conservation Programs*	Improve energy efficiency / reduce energy bills
Energy Education	Improve engagement, and understanding of role of utilities and programs, customer bills and charges, and safety
Weatherization Kits	Improve energy efficiency / reduce energy bills
Oregon Gas Low-Income Assistance * [OLGA]	Improve energy affordability through bill assistance
Gas Assistance Program [GAP]	Improve energy affordability through bill assistance
Oregon Bill Discount Program*	Reduce energy burden; improve energy affordability through discounted rates
Washington Bill Discount Program*	Reduce energy burden; improve energy affordability through discounted rates
2024 Washington Arrearage Management Program	Reduce energy burden; improve energy affordability through discounted rates
Washington Community Action Plan* (CAP)	Temporary emergency arrearage assistance during COVID
Oregon Arrearage Program (AMP)	Temporary emergency arrearage assistance during COVID
Community Equity Advisory Group (CEAG)	Strengthen Procedural Equity practices; Broaden engagement and participation in energy planning
Community Partnerships and Outreach	This includes community event support and programmatic outreach
Community Grants and Funds	Support over 250 nonprofit organizations through NW Natural territory

³ <https://www.energy.gov/scep/slsc/lead-tool?lShareCode=661eb816b46fe> and the PHMSA maps: [PHMSA Social Equity Mapping Tools](#)

2025 IRP Public Engagement

The Company's 2025 IRP public engagement format will include the following opportunities and tools for outreach and/or engagement; a summary of each is provided below. Work is underway to improve engagement and communication tools and we will continue to work with our CEAG and other stakeholders to refine the process as needed. Importantly, the public participation tools and engagement opportunities will follow accessibility guidance, such as a Plain Language review where appropriate. This addition to the IRP process is an important step to improving procedural equity principles in the IRP.

- **General Accessibility Tools and Features**

The Company strives to include accessibility features and offerings throughout its programming, and customer and stakeholder outreach. As a tool becomes known or available in one area, we attempt to apply it throughout the Company as appropriate. For example, many NW Natural services and programs are translated into languages other than English. The IRP team will be offering translation services for stakeholder meetings by request and will utilize closed caption and live caption features offered through virtual platforms. In addition to translation services, the Company will also look to incorporate plain language reviews, meeting summaries, reporting on how feedback was utilized, and importantly providing the right level of educational content and safe spaces for new participants to be able (and feel comfortable) to effectively participate.

- **Dedicated Resource Planning Webpage and Contact Information**

The NW Natural website features a [resource planning page](#) with information on past and present IRPs, upcoming workshops, archived materials, and the IRP team's contact details. Feedback and questions can be sent to the dedicated email, IRP@nwnatural.com, which is also used for IRP-related announcements.

- **Feedback Form and Summary Report**

The IRP team regularly requests and responds to feedback provided on its IRP. For the 2025 IRP, the team will be implementing a more standardized approach to collecting and responding to feedback. This form will be available to all stakeholders.

- **Open House Workshop**

This workshop will kick off NW Natural's IRP engagement for the 2025 IRP. The content will be structured as an IRP 101 with an intent to introduce the team to stakeholders and cultivate relationships for the work ahead as well as to inform stakeholders of the IRP process and provide a high-level review of the IRP process and outcomes. This will be open to all stakeholders.

- **Two-Track Approach for Workshops**

Track 1- Community Sessions: Exploring Energy Planning

NW Natural will be adding a set of webinars which are intended to explore IRP topics at a more general level and be more accessible to those without technical expertise in resource planning. These will be interspersed into the traditionally held Technical Working Groups

(TWGs) series schedule. These webinars will be open to all stakeholders and designed as 60–90-minute informative sessions with the ability for participants to ask questions and provide comment. NW Natural is seeking to hire a third-party facilitator to aid in making these spaces accessible, safe, and open for all stakeholders to learn and participate equitably. These webinars will be recorded and posted on NW Natural’s website.

Track 2 – Technical Working Groups (TWGs)

In the past, Technical Working Groups (TWGs) were day-long workshops, lasting 6-7 hours. They aimed to present crucial technical information to stakeholders, covering topics like risk analysis, scenario development, and modeling methods. However, for the 2025 IRP, NW Natural is adapting these workshops based on stakeholder input to have more, but shorter meetings.

The TWGs will remain a technical forum for consultation and IRP development, but their structure will change. Specifically, they will consist of 12, 3-hour sessions. To facilitate the necessary technical discussions, NW Natural will introduce an application process for TWG participation. The TWG structure will allow room for observers and the Company will additionally offer a feedback form for stakeholders to provide written input. Similar to track 1, NW Natural is actively seeking a third-party facilitator for this process. These TWGs will be recorded and posted on NW Natural’s website.

Technical Working Group Application for Participation:

In addition to previous experience, the Company looked to similar technical forums as well as referred to stakeholder participation/ facilitation experts to determine the most effective approach to holding robust, collaborative, and technically complex discussions. Taking a cue from other industry leaders, we have concluded that best practices include tailoring approach to fit the intended audience, limiting group size, and balancing diverse expertise. The Company will work with an independent third-party to determine the appropriate mix of expertise, group size, and application process. Regional examples of ‘closed’ and/or application driven technical forums include Oregon DEQ’s CPP Rulemaking Advisory Committee⁴, Washington SBCC’s Technical Advisory Groups⁵, Portland Clean Energy Fund Advisory Groups⁶, and Puget Sound Energy’s Resource Planning Advisory Group⁷. NW Natural supports this approach to provide a safe space for all participating applicants to feel comfortable asking questions and engaging the rest of the group. The selected applicants collectively will be known as the technical working group advisors.

- **IRP Fair Events**

The concept of the IRP Fair received very positive feedback from the CEAG to replace the previously hosted meeting for the public. This will be held in person and the Company aims

⁴ <https://www.oregon.gov/deq/rulemaking/Pages/CPP2024.aspx>

⁵ <https://sbcc.wa.gov/meeting-schedules-agendas/technical-advisory-groups>

⁶ <https://www.portland.gov/bps/cleanenergy/advisory-groups>

⁷ <https://www.pse.com/en/IRP/Get-involved>

to host one before the first Technical Working Group meeting and again after filing the Draft IRP. These events will last 1.5 to 2 hours and will focus on resource planning information and education. Subject matter experts will be stationed at topic-specific tables for stakeholders to explore at their own pace. These events will be open to all stakeholders, inclusive of those with children.

- **Workpapers Workshop / IRP Office Hours**

This workshop will be held once the IRP and workpapers are filed with the Commission. This workshop will be open to all stakeholders. Additionally, NW Natural is willing to host open office hours as needed during the IRP process.

- **Outreach for Commission-led Process**

NW Natural has little control over the commission-led ‘formal’ public process, but NW Natural can improve outreach to provide information on how and/or when to get involved. For this improved outreach, the dedicated IRP email and associated distribution list as well as the IRP webpage will be utilized.

Schedule of Public Participation

The below Table 3 outlines the NW Natural-led public participation process for the Company’s 2025 IRP. Unless noted as in-person only, public engagement opportunities will be either virtual or hybrid with a virtual option. Six TWG topics are split into two-part sessions intended to be scheduled for 3 hours each. This 12-part series is replacing the previous 6 full day meetings from previous IRP processes. Each topic may not warrant two sessions and if this becomes the case, NW Natural will alert stakeholders to any changes or cancelations. All dates are tentative and subject to change.

Table 3 - Public Participation Process for NW Natural’s 2025 IRP

Public Engagement Opportunity & Topic	Date	Type & Purpose of Engagement
IRP Open House: About NW Natural & Overview of the IRP	September 3, 2024	Kickoff for the IRP. Meet and greet with opportunity to learn and connect with IRP team.
IRP Fair #1: About IRPs and Energy Services & Programs	September 22, 2024	In-Person Only. Opportunity to learn and engage. Event to be held in collaboration with community partners.
Technical Working Group #1: Part 1 Planning Environment, Environmental Policy, and Equity Considerations	October 15, 2024	Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.

<p>Technical Working Group #1: Part 2 Planning Environment, Environmental Policy, and Equity Considerations</p>	<p>October 22, 2024</p>	<p>Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.</p>
<p>Community Session #1: Topic TBD</p>	<p>October 30, 2024</p>	<p>Opportunity to learn and engage on single topic related to resource planning and utility energy services.</p>
<p>Technical Working Group #2: Part 1 Load Forecasting</p>	<p>November 5, 2024</p>	<p>Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.</p>
<p>Technical Working Group #2: Part 2 Load Forecasting</p>	<p>November 12, 2024</p>	<p>Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.</p>
<p>Technical Working Group #3: Part 1 Avoided Costs & Demand-Side Resource</p>	<p>December 10, 2024</p>	<p>Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.</p>
<p>Technical Working Group #3: Part 2 Avoided Costs & Demand-Side Resource</p>	<p>December 17, 2024</p>	<p>Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.</p>
<p>Community Session #2: Topic TBD</p>	<p>January 8, 2025</p>	<p>Opportunity to learn and engage on single topic related to resource planning and utility energy services.</p>
<p>Technical Working Group #4: Part 1 Supply-Side & Compliance Resources</p>	<p>January 21, 2025</p>	<p>Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.</p>
<p>Technical Working Group #4: Part 2 Supply-Side & Compliance Resources</p>	<p>January 28, 2025</p>	<p>Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be</p>

		involved in and/or collaborate on a solution.
Technical Working Group #5: Part 1 Resource Optimization Planning Model and Portfolio Results	February 25, 2025	Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.
Technical Working Group #5: Part 2 Resource Optimization Planning Model and Portfolio Results	March 4, 2025	Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.
Technical Working Group #6: Part 1 Distribution System Planning and Action Plan	April 1, 2025	Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.
Technical Working Group #6: Part 2 Distribution System Planning and Action Plan	April 8, 2025	Technical forum. Observers have opportunity to be informed and provide written feedback. Technical expert participants have opportunity to become informed, be consulted and have opportunity to be involved in and/or collaborate on a solution.
Community Session #3: Topic TBD	April 16, 2025	Opportunity to learn and engage on single topic related to resource planning and utility energy services.
Technical Working Group #7: Part 1 Extra Reservation	April 22, 2025	Reserved for additional meeting times with the technical advisory panel if needed.
Technical Working Group #7: Part 2 Extra Reservation	April 29, 2025	Reserved for additional meeting times with the technical advisory panel if needed.
IRP Fair #2: About IRPs and Energy Services & Programs & Proposed Action Plan	May 10, 2025	In-Person Only. Opportunity to learn and engage. Event to be held in collaboration with community partners.
File 2025 IRP	August 2, 2025	Opportunity to be informed and provide feedback.

While this schedule outlines the official IRP meeting series, NW Natural is not limiting public engagement to the opportunities listed in this table and will continue to explore other avenues for public engagement for the IRP process and beyond. Engagement may extend to in-person activities in communities located throughout NW Natural’s service territory as well

as hosting meetings at various times of the day. Once scheduled, details will be communicated to stakeholders.

Details on Topics for Technical Working Groups

Topic	Details
Planning Environment	Review relevant factors impacting long-term resource planning, scenarios being considered for analysis in the IRP, and the distinction between system planning and distribution system planning.
Environmental Policy	Review current and potential federal, state, and local regulations and policies.
Equity Considerations	Review topics related to energy justice and how it relates to resource planning.
Load Forecasting	Review load forecasting methodology and preview draft results.
Avoided Costs	Review avoided cost methodology and avoided cost applications.
Demand-Side Resource	Review conservation potential assessments and energy efficiency forecasts, and other potential demand-side resources.
Supply-Side Resources	Review supply-side capacity resources required to serve system peak day energy requirements and annual energy requirements.
Compliance Resources	Review emissions reduction resources or other compliance resources that meet current or potential federal, state, and local emissions reduction policies.
Resource Optimization Planning Model and Portfolio Results	Review the resource optimization planning model (PLEXOS®), scenario portfolio results, and stochastic analysis results.
Distribution System Planning	Review distributions system planning, non-pipeline alternatives, and traditional supply-side solutions
Action Plan	Review NW Natural’s preferred action items based on the totality of the analysis conducted in the IRP.

Expected Contents of the 2025 Integrated Resource Plan

- Glossary of Terms
- Executive Summary
 - Overview of Company and Resource Plan
 - Principal Conclusions from this Plan
 - IRP Multi-Year Action Plan
- Planning Environment
 - Economic/Demographic Factors
 - Gas Price Forecast
 - RNG Markets
 - New Technologies

- Environmental Policy
 - Environmental Policy– Federal
 - Environmental Policy and Codes – State
 - Environmental Policy and Codes– Local
 - Emissions Compliance Price Forecast

- Equity Considerations and Public Participation
 - Equity Considerations
 - Energy affordability and assistance programs
 - Community and Equity Advisory Group
 - Enhanced Public Participation Process
 - Data Collection and Analysis

- Load Forecast
 - Customer Forecast
 - Climate Impacts
 - Residential & Commercial Forecasts
 - Industrial Forecast
 - Emerging Markets
 - Annual Load
 - Daily System Load Model
 - Planning Standard
 - Peak Day Forecast
 - Scenario Comparison

- Avoided Costs
 - Components
 - Demand Side and Supply Side Applications
 - Results

- Demand-Side Resources
 - Energy Efficiency Overview
 - Energy Efficiency Methodology
 - Demand-Side Management Forecasts
 - Demand Response
 - (ETO) Energy Efficiency and Conservation Programs
 - Income-based Energy Efficiency and Conservation Programs
 - Demand-Side Scenario Comparisons

- Emissions Compliance Resources and Electrification
 - Offsets, Allowances, Community Climate Investments
 - Renewable Thermal Credits, Low/Zero carbon fuels

- Electrification
- Supply Side Resources
 - Investments in Current Resources
 - Future Resource Alternatives (On-system)
 - Supply-Side Scenario Comparison
- Portfolio Results
 - Resource Planning Model
 - Integration Resource Planning Model Results
 - Emissions Forecast
 - Monte Carlo Simulation
 - Scenario Analysis
- Distribution System
 - Peak Hour Prediction and Forecasting
 - Distribution System Planning Criteria
 - Non-pipeline Solutions
 - Supply Side Resources
 - Projects
 - Alternatives Analysis
 - Equity Considerations
 - Preferred Options
- Public Engagement
 - Recap of the Technical Working Groups
 - Recap of Community Sessions
 - Recap of any other IRP public engagement and meetings

Attachment A

CEAG Summary and Polling Questions

Background and Objective:

Recognizing the need to hear from additional voices, NW Natural established the Community and Equity Advisory Group (CEAG) in late 2021.

NW Natural holds quarterly CEAG discussions on specific topics related to equity, energy justice, or other topics of interest related to NW Natural’s operations and energy services. The second meeting of the CEAG Year 2 took place on February 22, 2024. The aim of the meeting was to discuss procedural justice in relation to NW Natural’s Integrated Resource Plan (IRP) process and to review and receive feedback on proposed engagement activities for the 2025 IRP public process.

CEAG members were provided an IRP public engagement proposal document one week in advance of the meeting for review prior to the meeting. This document provided an overview of the IRP purpose, historical practices for public engagement opportunities during the IRP process, a proposal for changes in the process, and a request that members come prepared to provide feedback. The team utilized a mix of polls, break out rooms, and large group discussions to facilitate the conversation.

Subsequently, after the meeting, an online survey with the poll questions was provided to CEAG members to share with their communities to collect more feedback. Between the CEAG member’s answers at the February 22nd CEAG meeting and additional survey respondents, we collected **31** responses.

Procedural Equity & Justice Discussion Summary:

CEAG participants discussed the terms ‘procedural equity’ and ‘procedural justice’. Through the use a word cloud and breakout room discussions, NW Natural explored what some of the words and phrases mean to participants and members discussed examples of processes where procedural equity was demonstrated and/or an opportunity for equity was missed. Examples include:

- providing a clear closed circle on how feedback is being utilized when it is collected from communities,
- acknowledging multiple ways of learning and grasping information - includes information and physical accessibility,
- making sure that those who are going to be impacted are really part of those earlier planning decisions and conversations, and
- creating a safe and welcoming space for those who may not be as familiar with a process or jargon – supporting learning without shaming.

The Integrated Resource Plan:

CEAG participants learned about IRPs and NW Natural’s IRP public engagement process. Discussion and requests for feedback were focused on the proposed public engagement strategies for the upcoming 2025 IRP process.

Poll results showed varying levels of interest across different formats. The IRP Fair emerged as the most favored due to its public appeal and accessibility. The discussion on the IRP engagement strategy endorsed utilization of community feedback, the use of simple language, and the prioritization of customer bill impacts. Emphasis was placed on ensuring clarity in meeting agendas and employing a targeted invitation approach.

The importance of leveraging existing relationships with community organizations and implementing targeted strategies was noted. Participants underscored the importance of elevating the knowledge and experiences that diverse communities can bring to these discussions.

The meeting culminated with the question, “do changes in the proposed public engagement strategy document moves the IRP toward procedural equity and justice?” Participants agreed that the proposal moves the Company in right direction but cautioned that it will naturally be an iterative process that will continue to evolve.

Survey Results Summary

The in-meeting poll questions (“P”) and the survey questions (“S”) differed slightly to provide context in written form. Poll and survey questions are summarized below. Where questions were similar, we combined those results into one summary. Numbering refers to the poll or survey question number.

Word Cloud: What words or phrases comes to mind when thinking about procedural justice?



IRP Fair⁸ : In previous IRP processes, NW Natural hosted a meeting for the public after filing the IRP to answer questions. In replacement of this meeting for public we are proposing having an IRP Fair at the start of the process and after filing the IRP. On a scale from 1 – 5 (1 = bad idea and 5 = good idea), how do you feel about the IRP Fair as proposed?

⁸ Responses from polling question one and survey question two

Responses:

Answer	Percentage
1	0%
2	0%
3	14%
4	64%
5	21%
Average Score	4.07

Action: NW Natural will work with CBOs to host an IRP Fair at the start of the process and after filing the IRP.

Clear and Specific Name for Public Participation Webinars⁹: Different utilities are calling these webinars by different names. We want the name to encourage all customers to feel comfortable in both attending and participating. Do you have a preference on what we are calling our Public Webinars (Track 1)?

Responses:

Name	Percentage
IRP Public Input Meetings	20%
IRP Public Information Sessions	20%
IRP Public Engagement	17%
IRP Learning Labs	17%
Other - Write In	17%
IRP Roundtables	7%
IRP Public Webinars	3%

Write In Answers
IRP Community Learning Labs
Community Engagement Sessions
Exploring Energy Services Together
Community Webinars on Energy Services
Resource Plan Information Session
Community Power Sessions
Power to the People: Energy Insights for Everyone
Your voice matters
Energy Planning Explained

Action: The NW Natural team appreciates the great write-in answers provided in the polling and survey. A common word used in the write-in answers is “Community”. Feedback from the CEAG

⁹ Responses from polling question two and survey question five

members in the in-meeting discussion led to recommendations for a name that reflects both learning and engagement opportunities for the public. IRP in the name is not preferable as it could be exclusionary if someone doesn't already know the acronym. Based on this feedback, these public webinars will be called *Community Sessions: Exploring Energy Planning*.

Topics of Interest¹⁰: Choose the 3 IRP topics you would prioritize for the IRP Fair or Public Webinars?

- Demand Forecasting
- Customer Trends
- Resource Options
- Compliance Resources
- Energy Efficiency
- New Technology
- Local, State, and Federal Policies
- Preferred Portfolio
- Average Customer Bill Impacts
- IRP Engagement

Response:

Topic	Percentage
Average Customer Bill Impacts	21%
Energy Efficiency	18%
Resource Options	15%
New Technology	15%
Customer Trends	9%
Local, State, and Federal Policies	8%
Demand Forecasting	5%
Compliance Resources	5%
IRP Engagement	4%
Preferred Portfolio	0%

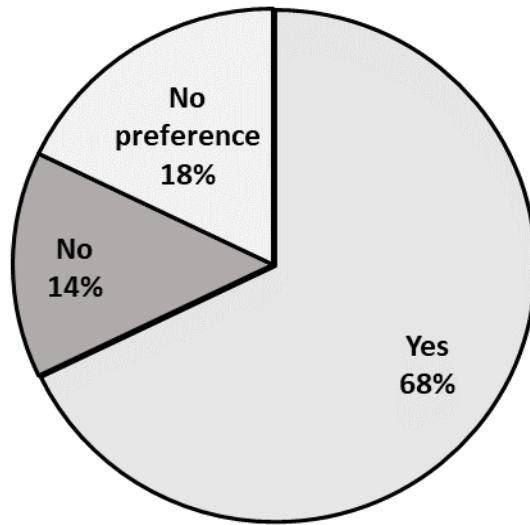
Action: NW Natural will prioritize the higher ranked topics for the IRP Fair and the Public Webinars.

Facilitator¹¹ (P2 & S6): Should we have a third-party facilitator run the IRP public webinars? Yes/No/No preference.

¹⁰ Responses from polling question three and survey question seven

¹¹ Responses from polling question two and survey question six

Response:



Action: NW Natural will work to get a third-party facilitator run the IRP public webinars.

Outreach Channels¹²: What marketing/outreach channels should be prioritized? Rank in order (1 = highest priority)

- Email distribution list
- Customer bill notice
- Social Media Channel Post (LinkedIn, Facebook, X(twitter))
- Partner Org communications (ex. community org. newsletter)
- Other (please type into chat)

Response:

Outreach Channel	Average Ranking (1 through 4)
Partner Org communications (ex. community org. newsletter)	2.03
Customer bill notice	2.35
Social Media Channel Post (LinkedIn, Facebook, X(twitter))	2.68
Email distribution list	2.94

Write-in Answers
Flyers
Radio announcements
Utilize an ambassador program

¹² Responses from polling question five and survey question eight

Action: Of the four given options, no single option stood out as far superior or inferior to the other options, but partnering with community organizations and customer bill notices were on average preferred (i.e., rank higher in priority). NW Natural will prioritize outreach based on the average rankings but will continue to use all available options for outreach and consider write-in answers when feasible.

IRP Process Participation¹³: On a scale of 1 – 5 (1 = not likely, 5 = very likely) How likely are you or your community to participate in the following:

- IRP Fair?
- Public Webinars?
- Formal Commission-led Public Process?

Response:

Process	Average Ranking
The IRP Fair	3.36
The Public Webinars	3.41
Formal Commission-led public process	2.70

Action: Based on feedback NW Natural will work through outreach channels to encourage public participation during the IRP process.

IRP Fair and Webinar Participation Written Feedback¹⁴: What would make it more likely for you to participate in either the webinars or the fair?

Written Feedback
I would more likely participate in the events if the results or resolutions from the event were made clear to everyone, and it was easy to see the impact from the event.
I would need more information about how the information or lack thereof would impact my day-to-day life.
Understanding the why I might join...impacts or gains from my participation.
Break them up into smaller units and make available on social media and your website.
Knowing the agenda for webinars ahead of time to see if it is something I am interested in. Opportunity for public to vote or request a webinar on a specific topic.
A small NW Natural bill rebate for participation.
Marketing - Exciting, Relatable and Educational experience.
Advance notice so I can make myself available.
Accessibility, and incentives like gift cards or a discounted NW Natural bill, free food.
More understanding of how my participation can help my community.

¹³ Responses from polling questions six, seven and eight and survey questions nine and eleven

¹⁴ Responses from polling question one and nine and survey question ten

Food and a chance to connect with other members of my community.
Have a date one to two weeks in advance.
Some form of incentive That is paid directly to the participant not to an organization.
An incentivized social action campaign from a trusted community-based organization with a social equity-based mission.
If I knew how I was impacted by natural gas- I personally currently don't have natural gas appliances or use natural gas for anything, and most of our buildings also don't use natural gas, so none of this seems relevant to me or my residents—i.e., why should I care if I'm not a customer/user?
I think webinars can be challenging to attend because they are a bit more 'passive' and it's hard to stay focused during a webinar. If it is short; has tech support to help people get on; and uses polls or other methods to engage the audience ... then I'd be more open to attending a webinar.
Dependent on time-availability.
Highlighting the ways this input will be impactful for communities being served.
Possibly an incentive, nothing extravagant, but I know for myself and especially the average member of the public, it's hard to fit another commitment into my schedule so having something to look forward to beyond a sense of civic engagement would be helpful, especially for something that is in-person where there is more time needed to commit.
This would depend on the day and time for me, as I have a second job.
Time of day and compensation or some sort of stipend; accessibility and language – being able to access information in preferred language.
Understanding why it is important and how the process works; having the information provided in an accessible (to all) format.
Hosting it in communities of color and that they are included/ inclusive; having representatives that look like them would be better too; Language on their terms / terminology they can understand and include kids.
I think that is very important when you look in the room that you are figuring out which communities you are going into- once you get to those communities, what how are you presenting the information but also making sure you have a translator in the room for people that do not and the translator needs to be able to understand the technical information to be able to translate properly. Important to be respectful of people's time and understanding the trust it requires for them to step into a space.
Fair seems the most public framed and interesting - also at the level of interest in the topics [for our community] is likely lower than even an hour of content.

IRP Commission-led Participation Written Feedback¹⁵: What would make it more likely for you to participate in the Commission-led process?

Written Feedback
More accessible locations and more reasons to participate.
Understanding the why I might join...impacts or gains from my participation.
Not sure.
Better understanding of what utility-led process and commission -led process are.
Summary of public comments and follow up on what happened/changed after public comments.

¹⁵ Responses from polling question nine and survey question twelve

User friendly Information.
Advance notice so I can make myself available.
Some form of compensation--pay people for their time and input.
More understanding of how my participation might help create greater equity.
Have a date up to a month in advance and with a reminder of 1 week and one day in advance.
I will be honored to participate in this. But again, it also needs to be compensation for people's time paid to people who are putting in the time.
If I knew how I was impacted by natural gas- I personally currently don't have natural gas appliances or use natural gas for anything, and most of our buildings also don't use natural gas, so none of this seems relevant to me or my residents-- i.e., why should I care if I'm not a customer/user?
To me it feels like there is a barrier around getting involved with Commission-led processes as a civic bystander because many terms or processes may be unfamiliar and I don't know how much of a voice I actually have in the process. Whether this is real or perceived, it feels like a barrier to entry and engagement.
Dependent on time-availability.
More flexibility with date/time ranges to engage.
Personally, having examples of past comments or a standard template would be helpful, along with brief bullet points of the process/useful info, so that forming comments would be a little easier.
Fair seems the most public framed and interesting - also at the level of interest in the topics [for our community] is likely lower than even an hour of content.
[need to understand] pieces that might/ might not pertain to them or interest in the topics
Formal process sounds intimidating!
People often feel like there is less impact/ input that will make a difference during the formal process. It feels more final.

ⁱ Following Commission Recommendations, the following resources were considered in the development of the terms, definitions and best practices referenced in this Work Plan:

- *In the Matter of the Petition of Northwest Natural Gas Company, d/b/a NW Natural Seeking Extension for 2024 Integrated Resource Plan*, docket UG-230783, Order 01, (Dec. 22, 2023).
<https://www.oregon.gov/deq/rulemaking/Pages/PPP2024.aspx>
- <https://sbcc.wa.gov/meeting-schedules-agendas/technical-advisory-groups>
- <https://www.portland.gov/bps/cleanenergy/advisory-groups>
- <https://www.pse.com/en/IRP/Get-involved>
- [DOE Clean Cities Coalition Network](#) and [National Association of Regulatory Utility Commissioners \(NARUC\)](#)
- Final Order 9 from Cascade’s GRC in Docket UG-210755
- [Revisiting the energy justice framework: Doing justice to normative uncertainties \(tudelft.nl\)](#)
- [Section 1 - Defining Energy Justice: Connections to Environmental Justice, Climate Justice, and the Just Transition - Initiative for Energy Justice \(iejusa.org\)](#)
- Direct feedback was provided over the course of several meetings on various topics related to Company operations and processes including the meeting held on February 22, 2024, specific to the topic of Energy Justice and the IRP.
- Informed by best practices defined in the [Distribution Systems Planning \(DSP\) Community Engagement Best Practices and Recommendations](#) report authored by United Oregon, the Community Energy Project, and Coalition of Communities of Color
- <https://www.energy.gov/scep/slsc/lead-tool?ItShareCode=661eb816b46fe>
- PHMSA maps: [PHMSA Social Equity Mapping Tools](#)