

September 13, 2021

NWN WUTC Advice No. 21-05 / UG-

VIA ELECTRONIC FILING

 Mark L. Johnson, Executive Director & Secretary
 Washington Utilities and Transportation Commission
 621 Woodland Square Loop SE
 Lacey, WA 98503

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 09/13/21 14:46
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 UTIL. AND TRANSP.
 COMMISSION

Re: Schedule 215: Adjustment to Rates for Energy Efficiency Service and 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 November 1, 2021, as follows:

Twenty-second Revision of Sheet 215-1	Schedule 215	Adjustment to Rates for Energy Efficiency Service and Programs
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Purpose

The purpose of this filing is to revise Schedule 215 to reflect adjustments to rates for the effects of applying temporary rate adjustments to forecast and amortize balances for the collection of 2021-22 and 2020-21 program year costs, respectively, under Schedule G “Energy Efficiency Services and Programs – Residential and Commercial.”

Consistent with the settlement in NW Natural’s last rate case, approved by the Washington Utilities and Transportation Commission (Commission) Order 06 in docket UG-181053, adjustments in Schedule 215 reflect a component for the forecasted expenses for the November 1, 2021 – October 31, 2022 time period plus the prior period deferral balance that captured variations between previous year forecast amounts and actuals; this component is included in the “Schedule G Current Year Costs” column in Schedule 215. In addition, the Company is amortizing a historical deferral balance consistent with Order 06; this amortization is included in the “Schedule G Historical Balance” column in Schedule 215.

The proposed adjustments are requested to become effective November 1, 2021, coincident with the requested effective date of the Company’s Purchased Gas Adjustment (PGA) filing, separately submitted as NW Natural’s WUTC Advice No. 21-08.

The Company’s pending 2020 general rate case in docket UG-200994 includes a proposal related to this Schedule 215. That proposal is not reflected in this filing; NW Natural will provide any updates or changes resulting from the Commission decision in UG-200994 in this docket and/or in the rate case compliance filing.

Background

NW Natural began offering energy efficiency programs to Washington customers on October 1, 2009, in compliance with Commission Order 04 in the Company's 2008 general rate case, docket UG-080546. NW Natural's energy efficiency programs were developed and continue to evolve under the direction and oversight of the Energy Efficiency Advisory Group (EEAG) which is comprised of representatives from NW Natural, Energy Trust of Oregon (Energy Trust), Commission Staff, Public Counsel, Alliance of Western Energy Consumers (AWEC), The Energy Project, and NW Energy Coalition.

The Company's energy efficiency programs were initially offered on a one-year pilot basis through the Energy Trust. In 2011, agreement was reached through the EEAG to continue using the Energy Trust as the program administrator for the Company's energy efficiency programs. Since 2009, the Company has been steadily providing energy efficiency resources to its Washington customers.

During 2020, the Company acquired 320,170 therm savings for a total program year cost of \$2,363,539. Total 2020 savings were approximately 94 percent of Energy Trust's 2020 goal of 339,331 therms. The quarterly and annual reports for the 2020 program year were filed with the Commission in compliance with the Company's Energy Efficiency Plan. The 2020 Annual Energy Efficiency Report, which was filed with the Commission in docket UG-190987 on June 1, 2021, is also included in the materials provided in support of this filing.

Proposed Changes

The proposed Schedule 215 adjustments are calculated on an equal-percentage-of margin basis, and are shown for each rate schedule on page one of the supporting materials to this filing. It should be noted that the proposed Schedule 215 adjustments represent just one of the deferred accounts that are proposed to be applied to customer rates effective November 1, 2021, (see NW Natural's WUTC Advice Nos. 21-04, 21-06, 21-07, and 21-08). As such, the bill effects stated herein are provided for illustrative purposes only and reflect the effect of removing the current Schedule 215 adjustments and applying the proposed Schedule 215 adjustments to current billing rates.

If there were no other adjustments to rates effective November 1, 2021, the effect of Schedule 215 would be minimal to the average monthly bills in the primary rate schedules. The average residential Schedule 2 customer using 57 therms would see an increase of \$0.51 per month, and the average Schedule 3 commercial customer using 235 therms would see a bill increase of \$1.93 per month. The bill impact for customers on the other residential and commercial rate schedules is shown on page two of the supporting materials to this filing.

In support of this filing, the Company provides worksheets showing the derivation of the proposed Schedule 215 adjustments to rates, a worksheet showing balances for deferral accounts 186316, 186317, and 186318, and the 2020 Annual Report to the Commission on NW Natural's energy efficiency program.

In accordance with WAC 480-90-198 and WAC 480-90-194(5), the Company will provide notice to customers as stated in WAC 480-90-194(4). A copy of this notice is included with the Company's PGA combined effects informational filing, made separately but concurrently with this filing.

The proposed rate change will affect all of NW Natural's Washington residential and commercial class sales service customers. NW Natural currently serves approximately 84,744 residential customers and 7,363 commercial customers in the Company's Washington service territory.

Conclusion

The Company respectfully requests that the tariff sheets filed herewith be approved to become effective with service on and after November 1, 2021.

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.

Please address correspondence on this matter to Susan Chao at susan.chao@nwnatural.com with copies to the following:

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Sincerely,

NW NATURAL

/s/ Kyle Walker, CPA

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Attachments:

NEW-NWN-Advice-21-05-WA-EE-Programs-Trf-Sheet-215-1-09-13-2021
NEW-NWN-Advice-21-05-WA-EE-Programs-Exh-A-09-13-2021
NEW-NWN-Advice-21-05-WA-EE-Programs-Exh-A-09-13-2021-xlsx