



# ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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June 23, 2022

**SENT VIA WEB PORTAL**

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P. O. Box 47250  
Olympia, WA 98504-7250

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COMMISSION

Re: *Northwest Natural Gas Proposed Revision to Tariff No. WN U-6 to revise Schedule K-COVID-19 Assistance Program (CAP),*  
Docket UG-220358

Dear Director Maxwell:

The Public Counsel Unit of the Washington State Attorney General’s Office (Public Counsel) respectfully submits these comments in advance of the June 30, 2022, Open Meeting. These comments are in response to the Northwest Natural Gas (NW Natural or the Company) filing of proposed changes to the Company’s tariff WN U-6, to add language to Schedule K COVID-19 Assistance Program (CAP) to enable NW Natural to expand current auto-enrollment practices for income-qualifying customers. Public Counsel appreciates the in-depth discussion and work that was put in through the Gas Residential Energy Assistance Tariff (GREAT) Advisory Group, and NW Natural’s efforts to elicit feedback from stakeholders. We discussed the proposal with Washington Utilities and Transportation Commission Staff, The Energy Project, and the Company prior to the filing.

***Public Counsel’s Recommendation***

Public Counsel recommends the Washington Utilities and Transportation Commission approve the revisions to Tariff U-6 Schedule K- COVID-19 Assistance Program Plan.

Arrearages have continued to increase since the COVID-19 pandemic started, but COVID-19 assistance programs have been effective in decreasing known low-income arrears. While the 90+ day total residential arrearages have continued to grow for Washington utilities, that amount was cut in half for known low-income arrearages in part due to the introduction of auto-enrollment

To: Amanda Maxwell, Executive Director and Secretary  
Re: Northwest Natural Gas, Tariff Revision, Docket UG-220358  
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COVID-19 assistance programs across utilities.<sup>1</sup> NW Natural committed \$652,000 in CAP funds last year, and since the introduction of Schedule K, the Company has distributed CAP Grants to 275 households and expended \$92,640.91.<sup>2</sup> The Company automatically applied CAP funds to 138 customer accounts with past-due balances who received energy assistance since January 1, 2019 and brought them current. The Company's auto-enrolled grants make up 59 percent of CAP dollars awarded while auto-enrolled customers make up about half of the total number of CAP grants awarded. Thus, the automatic enrollment has helped reduce barriers to receiving energy assistance particularly for customers with high arrearage amounts. Yet NW Natural has not used 85.4 percent of its CAP funds and has a need to reach more eligible customers. The added language to Schedule K would enable NW Natural to auto-enroll low-income customers who earn up to 200 percent of the Federal Poverty Level (FPL) income using third-party data and, in-kind, provide relief to additional customers in arrears. Public Counsel believes this program will help NW Natural's most vulnerable customers reduce their arrearages.

Public Counsel appreciates NW Natural's efforts to develop and implement this program, and we encourage the Company to develop a permanent arrearage management program in order to address the long lasting impacts from COVID-19. Public Counsel would also encourage the Company to evaluate their accuracy and ability in reaching low-income homeowners and renters through the CAP auto-enrollment process in consultation with the GREAT Advisory Group. This would inform the Company of data limitations or biases toward certain types of households from third-party data, and it would allow the Company to adapt their approach to ensure equitable outcomes.

Public Counsel appreciates the opportunity to submit these comments. If you have any questions about this filing, please contact Aaron Tam at (206) 471-8296 or via e-mail at [Aaron.Tam@ATG.WA.GOV](mailto:Aaron.Tam@ATG.WA.GOV).

Sincerely,

/s/ 

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NS/AT

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<sup>1</sup> Comments filed by The Energy Project at 8, *In re Response to the COVID-19 Pandemic*, Docket UE-200281.

<sup>2</sup> Tariff WN U-6 Revisions at 2 (filed May 20, 2022).